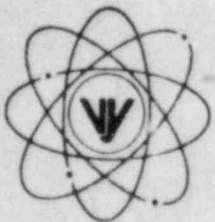


VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

FVY 84-142

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

December 4, 1984

U.S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Richard W. Starostecki, Director
Division of Project & Resident Programs

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, dated 5/2/84 and Inspection
Report 84-05, Appendix A (Notice of Violation)
c) Letter, VYNPC to USNRC, dated 6/1/84
d) Letter, USNRC to VYNPC, dated 11/5/84
e) Letter, VYNPC to USNRC, dated 11/9/84
f) Letter, VYNPC to USNRC, dated 11/21/84

Dear Sir:

Subject: Additional Response to Inspection Report 84-05

This letter is written in response to Reference d), which indicates that our response, Reference c), to the findings of your Inspection 84-05, Reference b), did not adequately address the issues.

The following information is submitted to describe some additional measures we have taken to further address the violation.

Based on your strong concerns/interpretation relative to conformance with Technical Specifications 6.5A and D, we will revise AP 0155 to require two senior licensed operators to concur with a long term change to normal equipment status of Technical Specification referenced equipment when changes (not covered by another procedure, e.g., tagging/surveillance) are made to plant equipment. AP 0155 will also be enhanced to require the Shift Supervisor to assure the following items are acceptable prior to performing equipment changes:

1. the intent of the safety design specifications and requirements provided in the FSAR are not violated;

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2. the potential for increasing the probability of loss of system function by needing additional equipment to function satisfactorily;
3. whether the new configuration is consistent with system operability requirements; and
4. whether current surveillance is commensurate with the off normal operational alignment.

These changes will be completed and the procedure issued by February 1985.

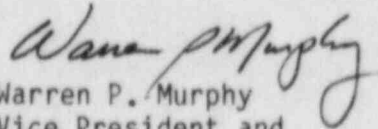
In addition, changes to Technical Specification referenced equipment line-ups made as a result of the above program improvements will be reviewed semi-annually by the Plant Operations Review Committee and then submitted to the Plant Manager for approval. The changes detailed in this response are being made in view of and in conjunction with our responses to violations previously identified in Inspection Reports 84-18 and 84-20. Additional corrective action (both scheduled and implemented) can be found in these responses.

In response to your statement that AP 0155 was not reviewed by October 10, as committed to in our original response to the violation, it should be noted that it was our intent to meet our commitment assuming our original response was acceptable to the NRC. In June of 1984, we received verbal notification from the Resident Inspector that our response would not be acceptable to the NRC. Formal review of the procedure was therefore deferred until we receive formal notification of the reasons for rejection.

We trust that this information will be satisfactory; however, should you have any questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm