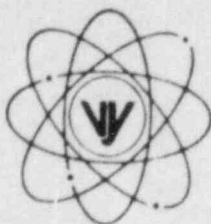


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 85-40

REPLY TO:

ENGINEERING OFFICE

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

May 3, 1985

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation  
Mr. Domenic B. Vassallo, Chief  
Operating Reactors Branch No. 2  
Division of Licensing

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, VYNPC to USNRC, FVY 85-11, dated 1/31/85

Dear Sir:

Subject: Operability Requirements for Electrical Equipment  
Requiring Environmental Qualification

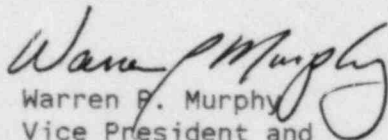
By letter dated January 31, 1985 [Reference b)], Vermont Yankee certified to you that the Vermont Yankee Nuclear Power Plant was in compliance with the requirements of 10CFR50.49, Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants. This letter stated that Vermont Yankee has administrative controls in place to ensure environmental qualification status of Vermont Yankee.

Attachment A, Vermont Yankee Operability Requirements for Environmentally Qualified Equipment and Components, is provided for your information, and describes the administrative controls instituted by Vermont Yankee and specific actions Vermont Yankee will follow in the event the environmental qualification status of a component becomes uncertain.

Should you desire additional information, or have any questions, do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren E. Murphy  
Vice President and  
Manager of Operations

WPM/dm

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## ATTACHMENT A

### VERMONT YANKEE OPERABILITY REQUIREMENTS FOR ENVIRONMENTALLY QUALIFIED EQUIPMENT AND COMPONENTS

It is the policy of Vermont Yankee's corporate management that all equipment and components which are addressed by Vermont Yankee's Environmental Qualification Program shall be maintained operable and fully environmentally qualified at all times, commensurate with the status of the plant.

However, it is anticipated that situations will arise where, although the as-installed equipment at the Vermont Yankee plant is operable, the environmental qualification status of the equipment cannot be confirmed. This may be the result of changes or ambiguities in the qualification documentation for the equipment or components, the result of as-installed deficiencies discovered during the course of maintenance and surveillance activities, or the result of qualified equipment failure. Vermont Yankee recognizes that these situations are significant and should be addressed in a timely and responsive manner, but does not believe that they warrant immediately declaring the component inoperable.

There are three general classifications of equipment and components which are important in terms of assuring the environmental qualification of the Vermont Yankee plant, in accordance with this Plan and the bases inherent in the Environmental Qualification Program documentation. These are:

- o Environmentally qualified equipment and components which are also covered by the Vermont Yankee Technical Specifications;
- o Environmentally qualified equipment and components which are not covered by the Vermont Yankee Technical Specifications; and
- o Equipment not requiring environmental qualification or structural features which are relied upon to maintain defined environments for qualified equipment or components during and following postulated design basis accidents.

Each of these classifications of equipment and components are addressed separately.

1. Operability of Environmentally Qualified Equipment or Components Covered by Vermont Yankee Technical Specifications

1.1 Failure of Equipment

Whenever equipment or components which are both environmentally qualified and covered by Vermont Yankee Technical Specifications fail (are not operable), the operability requirements of the Technical Specifications shall apply.

1.2 Lack of Assurance of Environmental Qualification

Whenever equipment or components which are both environmentally qualified and covered by Vermont Yankee Technical Specifications remain operable, but assurance cannot be provided that the equipment or component is fully environmentally qualified (due to questions of either the qualification documentation or the as-installed status of the equipment or component), disposition of the discrepancy shall be provided within seven (7) days in accordance with approved procedures for generation and approval of Non-Conformance Reports. The Non-Conformance Report shall include a Justification for Continued Operation (JCO). At the end of seven (7) days where continued operation is not justified, the equipment or components shall be declared inoperable and the operability requirements of the Vermont Yankee Technical Specifications shall apply.

2. Operability of Environmentally Qualified Equipment or Components Not Covered by Vermont Yankee Technical Specifications

2.1 Whenever safety class equipment or components which are environmentally qualified but are not covered by Vermont Yankee Technical Specifications fail (are not operable), or assurance cannot be provided that the equipment or component is fully environmentally qualified (due to questions of either the qualification documentation or the as-installed status of the equipment or component), disposition of the discrepancy shall be provided within thirty (30) days in accordance with approved procedures for generation and approval of Non-Conformance Reports. The Non-Conformance Report shall include a Justification for Continued Operation.

2.2 Non-Safety Class Equipment or Components

Whenever non-safety class equipment or components which are environmentally qualified, but are not covered by Vermont Yankee Technical Specifications fail (are not operable) or assurance cannot be provided that the equipment or component is fully environmentally qualified (due to questions of either qualification documentation or the as-installed

status of the equipment or component), the component shall be returned to operable status or assurance of full environmental compliance shall be provided within the following thirty (30) days. If the component cannot be made operable or assurance of full environmental compliance cannot be provided within thirty (30) days, a memorandum shall be prepared and directed to the Vermont Yankee Manager of Operations within the next seven (7) days justifying continued operation in the existing condition, proposing a corrective action plan to correct the existing condition and proposing a corrective action schedule.

The Vermont Yankee Manager of Operations shall review the memorandum for the appropriateness of continued operation, corrective action completed and schedule for additional corrective action. The Manager of Operations shall concur in the continued operation of the plant, the corrective action, and the schedule; or shall direct alternative actions based upon his review of the specifics of the condition.

3. Operability Requirements for Equipment or Structural Features  
Relied Upon for Maintenance of Environmental Conditions Assumed  
During and Following Postulated Design Basis Events

Equipment and structural features, as specifically identified, shall be in the required status to assure maintenance of required environmental conditions assumed during and following postulated design basis accidents. Deviations from the required status shall be corrected within thirty (30) days. If the deviation cannot be corrected and returned to the required status within thirty (30) days, a memorandum shall be prepared and directed to the Vermont Yankee Manager of Operations within the next seven (7) days justifying the continued deviation, proposing a corrective action plan to correct the deviation and proposing a corrective action schedule.

The Vermont Yankee Manager of Operations shall review the memorandum for the appropriateness of continued operation, corrective action completed and schedule for additional corrective action. The Manager of Operations shall concur in the continued operation of the plant, the corrective action, and the schedule; or shall direct alternative actions based upon his review of the specifics of the condition.