

DEC. 23 1992

License: DPR-28

Docket: 50-271

Mr. Warren P. Murphy  
Senior Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
RD 5, Box 169  
Ferry Road  
Brattleboro, Vermont 05301

Dear Mr. Murphy:

Subject: **Emergency Preparedness Inspection 50-271/92-14 Response**

The purpose of this letter is to acknowledge your September 25, 1992 letter committing to the following improvement actions related to Emergency Preparedness (EP).

- Evaluation of the interface between EP and other site and corporate departments by February 1, 1993.
- Incorporation of a definition for "annual" in EP Training Procedure OP-3712.
- Modification of procedures AP-6000, "Plant Design Change Requests" and AP-6004, "Engineering Design Change Requests" in their next biennial revisions to require engineers to identify the impact of design changes on the Emergency Plan and the Emergency Plan Implementing Procedures.
- Modification of the EALs identified on NRC Inspection Report 50-271/92-14 to better conform to the guidance contained in NUREG-0654 by the annual exercise scheduled in April 1993.

We recognize that the actions you are taking to improve emergency preparedness represent your commitment to provide a stronger assurance of the ability to respond to emergencies. Thank you for your attention to these matters.

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No reply to this letter is required.

Sincerely,

Original Signed By:  
James H. Joyner

James H. Joyner, Chief  
Facilities Radiological Safety  
and Safeguards Branch  
Division of Radiological Safety  
and Safeguards

cc w/encl:

D. Reid, Plant Manager  
J. Thayer, Vice President, Yankee Atomic Electric Company  
L. Tremblay, Senior Licensing Engineer, Yankee Atomic Electric Company  
J. Gilroy, Director, Vermont Public Interest Research Group, Inc.  
D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire  
Chief, Safety Unit, Office of the Attorney General, Commonwealth of Massachusetts  
R. Gad, Esquire  
G. Bisbee, Esquire  
R. Sedano, Vermont Department of Public Service  
T. Rapone, Massachusetts Executive Office of Public Safety  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
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K. Abraham, PAO (2)  
NRC Resident Inspector  
State of New Hampshire, SLO Designee  
State of Vermont, SLO Designee  
Commonwealth of Massachusetts, SLO Designee

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bec w/encl:

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CONCURRENCES:

DRSS:RI

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DRSS:RI

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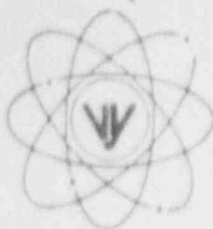
DRSS:RI

*JAY*

Joyner

12/23/92

# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO  
ENGINEERING OFFICE  
550 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

September 25, 1992  
BVY #92-116

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) Letter, USNRC to VYNPC, Inspection Report 92-14, dated 8/17/92

Subject: Response to Inspection Report 92-14

Dear Sir:

This letter is written in response to reference b), which identified two potential areas for improvement noted by your staff during an emergency preparedness inspection conducted at Vermont Yankee from June 29 - July 2, 1992. These areas were:

- (1) The interface between Emergency Preparedness and other departments (Report Detail 2.3)
- (2) Vermont Yankee Emergency Action Level criteria improvement items (Report Detail 2.9)

## Response to EP Interface:

Vermont Yankee will further evaluate the interface between Emergency Preparedness (EP) and other plant site and corporate departments. The purpose of the evaluation will be to verify that proper levels of interface are assured via procedures, policies, and other appropriate administrative controls. This evaluation will be completed by February 1, 1993. Schedules for any subsequent efforts will be determined at that time.

With respect to the Inspection report item related to training of security department personnel, we have (as was noted in the Inspection Report) revised the Emergency Plan Training Procedure (OP-3712) to define "annual" as twelve months, plus or minus three months, with respect to requalification of personnel on the Emergency Assistance Personnel List (EAPL). It is important to note that existing administrative controls were already in place within OP-3712 to ensure that the Emergency Preparedness Coordinator (EPC) would be made aware of any individual or group whose training was about to lapse. The EPC meets with the training instructor for emergency planning on a quarterly basis and reviews the Vermont Yankee EAPL to ensure that all personnel comprising the EAPL are qualified and will remain so through the subsequent calendar quarter. The situation regarding the security department was not brought to the attention of the EPC because the definition of "annual" in OP-3712 was presumed to be once every calendar year; thus security department personnel training would not have lapsed until the end of 1992.

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The second interface item in the Inspection Report related to ensuring that cognizant engineers for design change requests review the Emergency Plan and Emergency Plan Implementing Procedures (EPIP's) for potential impact. To address this item, procedures AP-6000, "Plant Design Change Requests" and AP-6004, "Engineering Design Change Requests" will be revised by the next scheduled biennial revision due date, to require the cognizant engineer to identify the impact, if any, of the design change on the Emergency Plan or EPIP's and to ensure, as appropriate, that the design change is reviewed by the Emergency Plan Coordinator. In the interim, Engineering Staff has been made aware of the concern to ensure that design changes are evaluated for impact on the Emergency Plan or EPIP's.

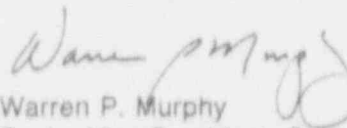
Response to Emergency Action Levels:

The Emergency Action Level (EAL) comments were discussed in detail with your staff on July 13, 1992 during a conference call. Vermont Yankee will make appropriate changes to our Emergency Plan Classification and Action Level Scheme Procedure, AP-3125, to address the concerns noted in the Inspection Report. This revision of the procedure will be completed by January 1993. Training on the changes to the procedure will then be accomplished prior to the Emergency Plan Exercise scheduled for April 1993.

We believe that the actions described above are responsive to your concerns; however, should you have any further questions, please do not hesitate to contact us.

Very truly yours,

Vermont Yankee Nuclear Power Corporation



Warren P. Murphy  
Senior Vice President, Operations

cc: USNRC Region I Administrator  
USNRC Resident Inspector - VYNPS  
USNRC Project Manager - VYNPS