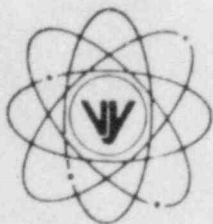


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 85-51

REPLY TO

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

May 31, 1985

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

Attention: Office of Nuclear Reactor Regulation
Mr. Harold R. Denton, Director

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, VYNPC to USNRC, FVY 83-30, dated 4/19/83
c) Letter, USNRC to VYNPC, dated 6/12/84
d) Letter, VYNPC to USNRC, FVY 84-105, dated 8/22/84
e) Letter, USNRC to VYNPC, dated 9/28/84

Dear Sir:

Subject: NUREG 0737, Supplement I - Implementation of
Upgraded Emergency Operating Procedures (EOP's)

By letter dated April 19, 1983 [Reference b)], we provided you with our schedule for implementation of Upgraded Emergency Operating Procedures (EOP's). This schedule was confirmed by order [Reference c)]. Due to simulator unavailability, an extension in our implementation date for EOP's was requested until June 1, 1985 [Reference d)], which resulted in a modification to the original order [Reference e)].

In the interim, all licensed operators at Vermont Yankee received classroom and simulator training on the new EOP's, consistent with a June 1, 1985 implementation date. During this period, due to concerns of operator acceptance and familiarity with these new procedures, Vermont Yankee's licensed operators were queried as to their readiness to implement these procedures on June 1. The operators had expressed confidence in their ability to implement that portion of the new EOP's which responded to design basis events addressed by our existing procedures. A certain uneasiness was expressed by operators regarding that portion of the new EOP's which addressed postulated scenarios exceeding design basis events for which no procedural guidance currently exists.

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Vermont Yankee's management evaluated these concerns expressed by our operators and concluded that the new EOP's should be implemented on schedule based upon the following:

- o operators had been trained on the new EOP's;
- o operator acceptance and familiarity with those portions of the new EOP's duplicating existing procedural guidance was high;
- o the new EOP's guidance for scenarios in excess of design basis events enhanced the safe operation of the Vermont Yankee plant; and
- o while operator acceptance and familiarity with those portions of the new EOP's dealing with scenarios in excess of design basis events was lower than that for procedures which had been used since plant commercial operation, existing classroom and simulator training plus operator statements that they could adequately perform the procedures gave assurance that implementation would enhance the safe operation of the Vermont Yankee plant.

Within the past week, as the implementation date for the new EOP's draws closer, concerns have been expressed by licensed operators on-shift that additional training (particularly simulator training) is desired for full operator acceptance and new EOP familiarity prior to implementation.

Vermont Yankee believes these concerns should be investigated and resolved prior to implementation of the new EOP's. Accordingly, we request that the June 1, 1985 implementation date contained in your order of September 28, 1984 [Reference e]] be modified to permit Vermont Yankee to continue to use our existing procedures for a period no later than our return to power from the upcoming 1985-86 outage (shutdown is scheduled for September 14, 1985 and return to power is scheduled for late April 1986). In this period, Vermont Yankee will take the following affirmative actions:

- 1) Interview and query each licensed operator to determine if training provided to date is adequate to permit that operator to undertake his licensed duties utilizing the new EOP's.
- 2) If deficiencies are identified in step 1), above, formulate a training plan to remedy such identified deficiencies either on an individual or en mass basis. Such training may be additional classroom familiarization with procedure format and/or content, additional familiarization and dry run time at a simulator; or a combination of both.

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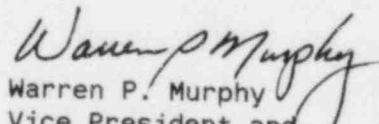
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The requested schedule extension represents a pessimistic scenario, wherein a substantial number of licensed personnel are determined to require additional familiarization and dry runs of the new EOP's at a simulator facility, and is intended to preclude any further deferral of EOP implementation. Vermont Yankee intends to implement the new EOP's at the earliest date possible, consistent with adequate operator acceptance and familiarity, to enhance safe operation of the Vermont Yankee plant.

We trust that this revised schedule is acceptable, and request your rapid review to modify the existing Confirmatory Order date. If you should have any questions in the matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm