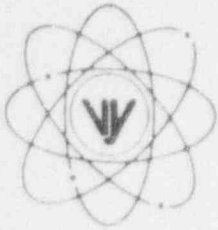


VERMONT YANKEE NUCLEAR POWER CORPORATION



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October 16, 1996
BVY 96-121

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
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- References:
- (a) License No. DPR-28 (Docket No. 50-271)
 - (b) Letter, USNRC to VYNPC, Inspection Report No. 50-271/96-05, NVEY 96-108, dated 6/19/96
 - (c) Letter, VYNPC to USNRC, BVY 95-137, dated 12/20/95
 - (d) Letter, USNRC to VYNPC, NVEY 96-139, dated 8/16/96

SUBJECT: Emergency Operating Procedure Issues

The purpose of this letter is to respond to your concerns expressed in Reference (b), regarding the Vermont Yankee Emergency Operating Procedure (EOP) Program. As was discussed during our meeting at King of Prussia on September 16, 1996, we share similar concerns and have taken steps to address them.

We believe the cause for the continuation of problem identification and timeliness of their resolution is attributed to unnecessarily complex and cumbersome administrative controls, and insufficient management oversight of our EOP maintenance and revision process.

Nevertheless, based on verification and validation of our EOPs and their use in our licensed operator simulator training programs, we remain confident that our EOPs adequately control and mitigate the entire spectrum of postulated events.

To address the shortcomings and upgrade our EOP program to be consistent with the highest industry standards, we have implemented the following action plan:

- (1) The technical justifications for the deviations discussed in section 5.12 of Reference (b), have been developed and incorporated into the Procedure Generation Package (PGP).
- (2) An independent review of EOP support calculations has been performed and all program or procedural changes identified as a result of this effort have been implemented.

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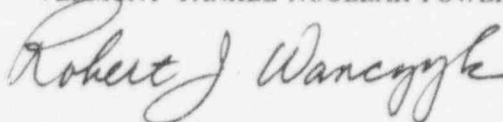
- (3) A comprehensive assessment of our entire EOP program to identify additional improvement opportunities has been initiated. This assessment will include:
 - a. Comparison of BWR Owners Group Emergency Procedure Guidelines (EPG) Rev.4 with the Plant Specific Technical Guidelines (PSTG) to ensure all differences are properly identified and justified in the PGP,
 - b. Review of the EPG to PSTG, and PSTG to OE differences appendices,
 - c. The Verification and Validation (V&V) program, including more specific qualifications and experience criteria for those individuals that provide oversight of V&V implementation,
 - d. Review of the EOP Program administrative controls, including an assessment of the maintenance and revision process.
- (4) An individual, who is knowledgeable in this subject area has been assigned full time responsibility for the completion of this action plan. This individual reports directly to the Operations Manager, the line manager responsible for the EOP functional area.

Our objective is to complete this action plan and have our program ready for followup inspection in April 1997.

We trust that the information provided is responsive to your concerns; however, should you require any additional information, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Robert J. Wanczyk
Plant Manager

CC: USNRC Region 1 Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS