

Vermont Yankee Nuclear Power Corporation

Ferry Road, Brattleboro, Vt. 05301-7002

October 22, 1996
BVY 96-130

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, NVCY 96-146, dated 10/20/96

Subject: Vermont Yankee Appendix R Compensatory Actions

During several discussions with NRR headquarters staff on October 21-22, 1996, members of Vermont Yankee presented information on Appendix R shutdown scenarios involving the Vermont Yankee Nuclear Power Station in Vernon Vermont.

The purpose of this letter is to formally document the enclosed Appendix R Fire Area Matrix which specifies station shutdown methods, capabilities and compensatory actions for both pre-outage and interim post-outage periods until such time as the previously submitted exemption requests have been resolved. Vermont Yankee fully intends to answer Reference (b) by October 25, 1996 and any subsequent technical questions by December 15, 1996.

The enclosed matrix defines the compensatory fire watch and other actions that will be in place throughout the interim period as part of our defense in depth Appendix R strategies. As a result of improvements completed during outage period, procedure enhancements and the compensatory actions listed in the enclosure, we believe that safety has been significantly improved.

We trust that the information provided is fully responsive; however should you have any additional questions or require any additional information, please contact this office.

Sincerely,

Vermont Yankee Nuclear Power Corporation



Robert E. Sojka
Operations Support Manager

cc: USNRC Region 1 Administrator
USNRC Resident Inspector - VYNPC
USNRC Project Manager - VYNPC

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Vermont Yankee Nuclear Power Station
Appendix R Fire Area Matrix

	Fire Areas						
	Control Room	Cable Vault	W. Swgr Room	RB-1	RB-2	RB-3	RB-4
Exemption Requests Pending NRC Approval	Vernon Tie App R Lights SRV Sw. Encl. ADS/LPCI	Vernon Tie App R Lights FireZone R Cable ADS/LPCI	App R Lights	ADS/CS	ADS/CS	ADS/CS	ADS/CS
Previous Shutdown Method	RCIC Alt S/D "A" EDG	RCIC Alt S/D "A" EDG	RCIC Locally	RCIC Locally	RCIC from Control Room	RCIC Locally	ADS/CS from Control Room
Reductions in Previous Shutdown Capability	None	None	None	None	None	None	None
Compensatory Measures Prior to 1996 Refueling Outage	Hot Work Control Two Hour Roving Fire Watch	Hot Work Control Continuous Fire Watch	Hot Work Control Continuous Fire Watch (1)	Hot Work Control Two Hour Roving Fire Watch ADS/CS Capability	Hot Work Control Continuous Fire Watch ADS/CS Capability	Hot Work Control Cont. Fire Watch Combustible and ignition source control	Hot Work Control Two Hour Roving Fire Watch
Compensatory Measures Until Exemption Requests Approved	Hot Work Control Two Hour Roving Fire Watch Portable Lights Additional Operations staff for "A" EDG	Hot Work Control Continuous Fire Watch Portable Lights Additional Operations staff for "A" EDG	Hot Work Control One Hour Roving Fire Watch (1) Portable Lights (for both East and West Swgr)	Hot Work Control Two Hour Roving Fire Watch ADS/CS Capability	Hot Work Control Continuous Fire Watch ADS/CS Capability	Hot Work Control Continuous Fire Watch ADS/CS Capability Combustible and ignition source control	Hot Work Control Two Hour Roving Fire Watch ADS/CS Capability
Completed Corrective Actions	MOV (IN 92-18) ADS Hot Short Alternate Fuses Vernon Tie Drywell Temp. MSIV Vent	MOV (IN 92-18) ADS Hot Short Alternate Fuses Vernon Tie Drywell Temp. MSIV Vent	Fire Wrap Repair CO ₂ System Mod (scheduled completion 11/30/96) (1)	CFZ location	CFZ location	SRV Reroute CFZ Location Fire Wrap Cable Coating Sprinkler Mods SRV Remote Sw.	CFZ Location
Interim Shutdown Method	RCIC Alt S/D plus ADS/LPCI "A" EDG	RCIC Alt S/D plus ADS/LPCI "A" EDG	RCIC from Control Room w/ local oper action	RCIC Locally or ADS/CS from Control Room	ADS/CS from Control Room	ADS/CS from Control Room	ADS/CS from Control Room
Shutdown Method with Exemption Approval	RCIC Alt S/D plus ADS/LPCI Vernon Tie	RCIC Alt S/D plus ADS/LPCI Vernon Tie	RCIC from Control Room w/ local oper action	RCIC Locally or ADS/CS from Control Room	ADS/CS from Control Room	ADS/CS from Control Room	ADS/CS from Control Room

Note: 1. Completed corrective actions eliminate requirement for continuous fire watch. Roving fire watch is required for fire protection Tech. Spec. CO₂ suppression system only.