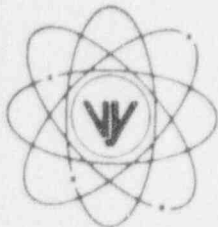


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE

580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

October 31, 1996
BVY 96-135

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
- (a) License No. DPR-28 (Docket No. 50-271)
 - (b) USNRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling Water Reactors," NYY 96-86, dated May 5, 1996
 - (c) Letter, VYNPC to USNRC, "Vermont Yankee Final Response to Bulletin 95-02," BVY 96-134, dated October 31, 1996
 - (d) Letter, VYNPC to USNRC, "Response to Bulletin 95-02 Requested Action 2," BVY 95-138, dated December 18, 1995
 - (e) Letter, VYNPC to USNRC, "30-Day Response to NRC Bulletin 95-02," BVY 95-123, dated November 16, 1995
 - (f) USNRC Bulletin 95-02, "Unexpected Clogging of a Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Pool Cooling Mode," NYY 95-147, dated October 17, 1995
 - (g) NRC Bulletin 93-02 and Supplement 1, "Debris Plugging of Emergency Core Cooling Suction Strainers"

Subject: Vermont Yankee 180-day Response to Bulletin 96-03

In Reference (b), the NRC requested licensees to implement appropriate measures to ensure the capability of the emergency core cooling systems (ECCS) to perform their safety function following a loss-of-coolant accident (LOCA). The NRC identified three potential resolution options; however, the NRC acknowledged that licensees may propose others which provide an equivalent level of assurance that the ECCS will be able to perform their safety function following a LOCA.

The NRC requested that licensees submit a report within 180 days of the date of this bulletin indicating whether they intend to comply with the requested actions, including a description of planned actions and mitigative strategies to be used, the schedule for implementation, and proposed Technical Specifications, if appropriate. The purpose of this letter is to provide the information requested.

Vermont Yankee has been closely following the industry activity regarding the potential for ECCS suction strainer clogging. As documented in References (c), (d) and (e), Vermont Yankee has ensured the continued operability of the ECCS at Vermont Yankee Nuclear Power Station. This conclusion is based on the following actions taken by Vermont Yankee to reduce the potential for ECCS strainer clogging:

- Thorough cleaning/desludging of the Torus during the 1995 and 1996 refueling outages.

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October 31, 1996

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- Inspections of the ECCS and Reactor Core Isolation Cooling (RCIC) strainers during the 1993, 1995 and 1996 refueling outages;
- RHR pump testing documented in Reference (d);
- Foreign material exclusion (FME) controls and drywell/torus closeout procedures for refueling outages, currently in place;
- Previous upgrade of our strainer designs which more than doubled the Residual Heat Removal (RHR) system strainer surface area, and more than tripled the core spray strainer surface area;
- Additional procedural guidance and operator training initiated in response to Reference (g).

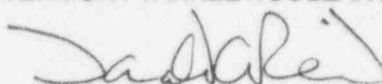
Vermont Yankee has been active with the BWROG ECCS Suction Strainer Committee. As identified in Reference (b), this committee is developing a recommended strainer design methodology which will be documented in the "Utility Resolution Guidance (URG) for Resolution of ECCS Suction Strainer Blockage." This document is expected to be submitted to the NRC in November 1996. This document will provide utilities with (1) guidance on evaluating ECCS suction strainer clogging for their plants, (2) a standard industry approach to resolution of the issue that is technically sound, and (3) guidance that is consistent with the requested actions of Reference (b). Vermont Yankee believes that this URG is an important part of the implementation of the final resolution of this issue.

Currently, Vermont Yankee plans to implement Option 1 of Reference (b), installation of larger capacity passive strainers, during our Spring 1998 refueling outage, the first refueling outage after January 1, 1997. However, this plan is preliminary. Vermont Yankee's final implementation plan will be based on the URG. Therefore, Vermont Yankee will supplement this letter following our review of an NRC-approved URG document. The supplement will include final implementation plan details.

We trust that the information provided is acceptable. However, should you have questions or require additional information, please contact this office.

Sincerely,

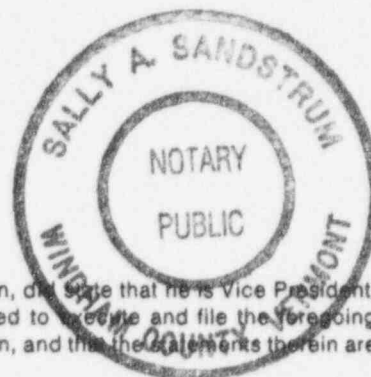
VERMONT YANKEE NUCLEAR POWER CORPORATION



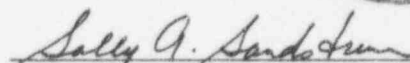
Donald A. Reid
Vice President, Operations

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

STATE OF VERMONT)
)ss
WINDHAM COUNTY)



Then personally appeared before me, Donald A. Reid, who, being duly sworn, did state that he is Vice President, Operations, of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.


Sally A. Sandstrum, Notary Public
My Commission expires February 10, 1999