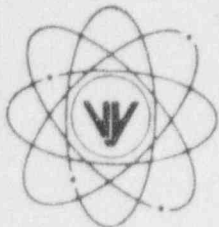


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE

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

February 19, 1997
BVY 97-25

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

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, VYNPC to USNRC, BVY 96-43, dated April 4, 1996
(c) Telecon, USNRC to VYNPC, dated February 12, 1997

Subject: Clarification Regarding Use of Vernon Tie for Appendix R Compliance

In Reference (b), Vermont Yankee requested an exemption from 10CFR50, Appendix R, section III.L to allow use of the Vernon Tie as a source of ac power in alternative shutdown scenarios. Vermont Yankee utilizes alternative shutdown capability in the event of a fire in the control room or cable spreading room. Currently, Vermont Yankee uses one of the two onsite emergency diesel generators in an alternate shutdown mode as a source of ac power when offsite power is not available in the event of a control room or cable spreading room fire.

This exemption was requested to facilitate the restoration of ac power to safe shutdown equipment and to reduce the operator timeline for initiating alternate shutdown systems. Use of the Vernon Tie has several significant advantages over use of an emergency diesel generator to meet alternate shutdown requirements. These advantages include: prompt restoration of power using simpler operator actions; continuous operation without dependence on support systems; and reliability of the Vernon Tie. As stated in Reference (b), the Vernon Tie is normally energized and the availability of Vernon Station has historically been well above 99%, exceeding the required alternate ac source availability of 95%. However, in the event the Vernon Tie is unavailable, a diesel generator will be available to provide backup power.

In Reference (b) Vermont Yankee stated that it would institute the following administrative limit in the event of an unplanned unavailability of the Vernon Tie:

Power operation may continue for no more than 15 days, unless the Vernon Tie is returned to service or a Basis for Maintaining Operability (BMO) evaluation is written and approved.

In Reference (c), the NRC staff expressed concern that the Vernon Tie, if approved for use as Vermont Yankee's preferred source of power for alternative shutdown, may be out of service

ADD 6/0

9702270077 970219
PDR ADOCK 05000271
PDR

United States Nuclear Regulatory Commission
February 19, 1997
Page 2 of 2

indefinitely without NRC notification. In consideration of the NRC staff's concern, Vermont Yankee will revise, upon approval of the exemption requested in Reference (b), the administrative limit stated above to require that a special report be submitted to the NRC in the event of an unplanned unavailability of the Vernon Tie. The revised administrative limit will read:

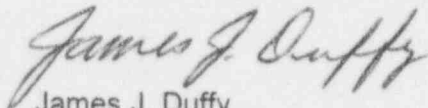
Power operation may continue for no more than 15 days, unless the Vernon Tie is returned to service or a Basis for Maintaining Operability (BMO) evaluation is written and approved by the Plant Operations Review Committee.

If the Vernon Tie cannot be returned to service within 15 days, submit a report to the Nuclear Regulatory Commission, in accordance with 10CFR50.4, within the next 24 hours outlining the reason for the unavailability, corrective actions being taken to restore the Vernon Tie, compensatory actions in place to provide ac power for Appendix R alternative shutdown fire scenarios and the time required to make the Vernon Tie available.

We trust that this submittal provides the requested information. However, should you have questions or require additional information, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



James J. Duffy
Licensing Engineer

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