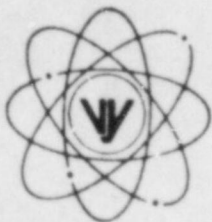


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

October 21, 1985
FVY 85-97

REPLY TO:
ENGINEERING OFFICE
1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Office of Nuclear Reactor Regulation
Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, VYNPC to USNRC, FVY 82-04, dated January 19, 1982
(c) Letter, VYNPC to USNRC, FVY 85-81, dated September 12, 1985

Subject: Vermont Yankee Scram System Design - Hydraulic Control
Unit (HCU) Support Modification Installation Schedule

Dear Sir:

By letter dated September 12, 1985 [Reference (c)], Vermont Yankee (VY) requested NRC concurrence to defer the schedule for completing the remaining modification to the insert and withdrawal line pipe supports. Although the design was completed and the modification scheduled for the 1985/1986 recirculation pipe replacement outage, an evaluation of the potential impacts on the outage concluded that the modification would directly interfere with the recirculation replacement effort.

During an October 15, 1985 Teleconference, the NRC staff requested additional information to support Vermont Yankee's request for deferral. Specifically, the staff wanted assurances that a commitment contained in earlier correspondence [Reference (b)] regarding the existence of procedures to control safety-related system work, was still being met. During the Teleconference, Vermont Yankee indicated that Procedure AP-0025, "Plant Equipment Control," directly addresses the administrative controls that must be satisfied for any work activity to be performed on safety-related or Technical Specification-referenced equipment, including work on the CRD System hydraulic control units. This procedure is referenced or incorporated within other applicable Vermont Yankee procedures and provides controls for: (1) removal of safety-related or Technical Specification-referenced plant equipment from operating service to allow the performance of maintenance, surveillance or modification; (2) return of that equipment to service upon completion of the work activity; and (3) inspection of safety-related or Technical Specification-referenced equipment during plant operation. The procedure specifically requires shift supervisor approval of the activity to be performed; this approval is only given following careful consideration of the plant status, system operability and other activities in progress. The

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United States Nuclear Regulatory Commission
Attention: Mr. Domenic B. Vassallo

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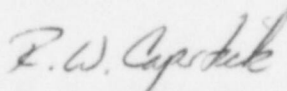
procedure also references other administrative controls that must be addressed, such as radiation work permits, tagging requests and lifted leads/jumpers. These controls provide for the appropriate independent verification of the final condition, valve lineups, breaker position, etc. of the effected equipment.

As stated previously in our September 12, 1985 letter [Reference (c)], we intend to commence work on the remaining modification to our insert and withdrawal line pipe supports upon completion of the recirculation pipe replacement effort and will complete the work within five (5) months following return to normal power operation.

We trust that the information provided above is sufficient to allow you to complete your review of our deferral request; however, should you require additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



R. W. Capstick
Licensing Engineer

RWC/glw