

February 25, 2000

Mr. Samuel L. Newton  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
185 Old Ferry Road  
Brattleboro, VT 05301

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION, REQUEST FOR  
ADDITIONAL INFORMATION REGARDING LICENSE TRANSFER  
(TAC NO. MA7875)

Dear Mr. Newton:

On February 24, 2000, we held a telephone conference with members of your staff regarding the proposed license transfer for Vermont Yankee Nuclear Power Station. During the telephone conference we discussed the enclosed request for additional information. The information is needed to complete our review of the (1) management and technical support organization and (2) the operating organization related to the proposed transfer of the operating license.

Please provide the requested information by March 14, 2000, as agreed to by Mr. Wayne Limberger of your staff on February 24, 2000.

Sincerely,

*/RA/*

Richard P. Croteau, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: As stated

cc w/encl: See next page

February 25, 2000

Mr. Samuel L. Newton  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
185 Old Ferry Road  
Brattleboro, VT 05301

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION, REQUEST FOR  
ADDITIONAL INFORMATION REGARDING LICENSE TRANSFER  
(TAC NO. MA7875)

Dear Mr. Newton:

On February 24, 2000, we held a telephone conference with members of your staff regarding the proposed license transfer for Vermont Yankee Nuclear Power Station. During the telephone conference we discussed the enclosed request for additional information. The information is needed to complete our review of the (1) management and technical support organization and (2) the operating organization related to the proposed transfer of the operating license.

Please provide the requested information by March 14, 2000, as agreed to by Mr. Wayne Limberger of your staff on February 24, 2000.

Sincerely,

*/RA/*

Richard P. Croteau, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: As stated  
cc w/encl: See next page

DISTRIBUTION

File Center PUBLIC PDI-2 Reading J. Clifford M.A. Ashley R. Croteau  
S. Black LBerry E. Adensam (EGA1) OGC ACRS  
C. Anderson, R-I

DOCUMENT NAME: C:\railtra7875.wpd

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	PDI-2/PM	PDI-2/LA			PDI-2/SC
NAME	RPCroteau	TLClark			JClifford
DATE	2/21/00	2/24/00	/ /00	/ /00	2/25/00

OFFICIAL RECORD COPY

Vermont Yankee License Transfer to AmerGen Vermont  
Request for Additional Information

The following information is requested to complete the review of the (1) management and technical support organization and (2) the operating organization related to the proposed transfer of the operating license for the Vermont Yankee Nuclear Power Station to AmerGen Vermont:

1. With regard to the management and technical support organization, Section V, "Technical Qualifications of AmerGen Vermont," page 18, states that technical support for the Vermont Yankee Nuclear Power Station will be provided in one of three ways:
  - a. Existing staff, who are not located on site, will continue to perform on behalf of AmerGen Vermont
  - b. Transfer of the technical support function to AmerGen (the parent company)
  - c. Transfer of the technical support function to contractors.

However, there is no information provided in the January 6, 2000, submittal that demonstrates how the organizational structure for any of the three options would provide for the integrated management of activities to support the operation and maintenance of the facility.

Identify the option that will be exercised at the time of the transfer. Supporting information, as listed below for each of the options, must be provided. If no single option can be identified, supporting information for all three options is needed to ensure that sufficient technical resources will continue to be provided to adequately support safe operation of the nuclear plant.

If option (a), will the existing offsite staff become AmerGen Vermont employees? If so, provide supporting organizational charts showing the reporting relationship and lines of authority for the offsite organization providing technical support to the onsite Vermont Yankee Nuclear Station organization. If the existing offsite technical support staff will not become AmerGen Vermont employees but will still be used to provide technical support, describe how sufficient technical support to the Vermont Yankee facility will be assured.

If option (b), provide supporting organizational chart showing the lines of authority back to AmerGen (the parent company). In addition, provide information about how the wholly owned AmerGen Vermont subsidiary will be assured sufficient technical support resources when competing with other nuclear facilities owned by AmerGen (the parent company.)

ENCLOSURE

If option (c), identify if the contractor support will be directly to AmerGen Vermont or thru AmerGen (the parent company). If through AmerGen, provide an organizational chart showing the lines of authority from AmerGen Vermont through AmerGen to the contractor. In addition, provide information about how AmerGen Vermont will be assured sufficient technical support resources using that contracting arrangement.

2. Provide resumes for the Chief Nuclear Officer and for the AmerGen Vermont Vice President, Vermont Yankee.
3. With regard to the operating organization, Section V, "Technical Qualifications of AmerGen Vermont," page 16, states "the existing VYNPC nuclear organization at the Vermont Yankee site will be transferred to AmerGen Vermont, and substantially all of the VYNPC nuclear employees at the Vermont Yankee site involved in the operation and maintenance of the plant will assume similar roles and responsibilities for AmerGen Vermont." Further, page 17 states that "the plant staff, including senior managers, will be substantially unchanged." On the basis of the above information and the information contained in the remainder of the submittal, the definition of "substantially unchanged" is interpreted as:

"the current onsite organizational structure and the assignment of primary responsibility to the plant staff of those onsite organizations will be transferred without change."

Verify this is the correct interpretation or submit the intended meaning for "substantially unchanged."

Vermont Yankee Nuclear Power Station

cc:

Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. David R. Lewis  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, N.W.  
Washington, DC 20037-1128

Mr. Richard P. Sedano, Commissioner  
Vermont Department of Public Service  
112 State Street  
Montpelier, VT 05620-2601

Mr. Michael H. Dworkin, Chairman  
Public Service Board  
State of Vermont  
112 State Street  
Montpelier, VT 05620-2701

Chairman, Board of Selectmen  
Town of Vernon  
P.O. Box 116  
Vernon, VT 05354-0116

Mr. Richard E. McCullough  
Operating Experience Coordinator  
Vermont Yankee Nuclear Power Station  
P.O. Box 157  
Governor Hunt Road  
Vernon, VT 05354

G. Dana Bisbee, Esq.  
Deputy Attorney General  
33 Capitol Street  
Concord, NH 03301-6937

Chief, Safety Unit  
Office of the Attorney General  
One Ashburton Place, 19th Floor  
Boston, MA 02108

Ms. Deborah B. Katz  
Box 83  
Shelburne Falls, MA 01370

Mr. Raymond N. McCandless  
Vermont Department of Health  
Division of Occupational  
and Radiological Health  
108 Cherry Street  
Burlington, VT 05402

Mr. Gautam Sen  
Licensing Manager  
Vermont Yankee Nuclear Power  
Corporation  
185 Old Ferry Road  
Brattleboro, VT 05301

Resident Inspector  
Vermont Yankee Nuclear Power Station  
U. S. Nuclear Regulatory Commission  
P.O. Box 176  
Vernon, VT 05354

Director, Massachusetts Emergency  
Management Agency  
ATTN: James Muckerheide  
400 Worcester Rd.  
P.O. Box 1496  
Framingham, MA 01701-0317

Jonathan M. Block, Esq.  
Main Street  
P. O. Box 566  
Putney, VT 05346-0566