

VERMONT YANKEE NUCLEAR POWER CORPORATION

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July 10, 2001
BVY 01-57

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Reference: (a) Letter, VYNPC to USNRC, "Proposed Vermont Yankee Operational Quality Assurance Manual (VOQAM) Revision," BVY 01-30, dated 4/23/01.

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Supplement to Submittal of Proposed VOQAM Revision

Enclosed for your review is a supplement to the referenced letter. During a telephone conversation with the Staff on July 5, 2001, Vermont Yankee (VY) learned that certain language remaining in the VY Operational Quality Assurance Manual (VOQAM) after submittal of Reference (a) conflicts with modified wording elsewhere in the updated document. The attached, corrected page will remove the conflict and bring all affected sections of the VOQAM into agreement. VY regrets any inconvenience that this oversight may have caused, and trusts that it will not significantly delay completion of your review.

Description of the Change

VY proposes to remove a portion of the language from Exception IX.B of VOQAM Appendix B regarding biennial audit of a representative sample of routine procedures "that are used more frequently than every two years." The usage stipulation in this paragraph is no longer applicable since a similar conditional statement was proposed for removal from the discussion of routine procedures earlier in the text, as described in Reference (a). With removal of the quoted wording from the procedure audit paragraph, the biennial audit will be performed on a sample of routine plant procedures regardless of their periodicity of use. No change is required to the "Justification" section of the exception since the relevant wording therein presently does not specify a usage threshold for procedures that are subject to audit.

Reason for the Change

This change will correct an oversight identified during NRC review of Reference (a).

Basis for Acceptability of the Change

This change will further align VY's practices for biennial audit of plant procedures with the changes proposed in Reference (a). VY has evaluated this change in accordance with 10CFR50.54(a)(3) and has determined that it does not constitute a reduction in commitment requiring NRC approval prior to implementation because it expands the scope of the current procedure audit program, making that program more inclusive. However, because it formed part of the NRC's previous approval bases for this exception and because it has a direct bearing on the acceptability of the changes proposed in Reference (a), VY is

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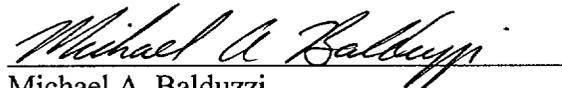
BVY 01-57 / Page 2 of 2

submitting this supplemental letter for your consideration. VY hereby requests NRC approval of this change by July 31, 2001, consistent with the schedule requested in Reference (a), on the basis that the requirement to observe a two-year usage restriction for inclusion of routine procedures in the biennial procedure audit program is no longer appropriate given the removal of similar wording from a related section of the text.

If you have any questions regarding this submittal, please contact Mr. Wayne M. Limberger at (802) 258-5830.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Michael A. Balduzzi

Sr. Vice President and Chief Nuclear Officer

Attachments

cc: USNRC Region 1 Administrator
USNRC Resident Inspector – VYNPS
USNRC Project Manager – VYNPS
Vermont Department of Public Service

Docket No. 50-271
BVY 01-57

ATTACHMENT 1

Vermont Yankee Nuclear Power Station

Supplement to Submittal of Proposed VOQAM Revision

Marked-up Pages

VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

Alternative:

Plant procedures will be assessed for adequacy either periodically or continuously in accordance with administrative controls. When periodic review is used as the assessment method, these controls will establish a schedule for review.

All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

Routine procedures are ^{managing,} those regularly exercised procedures ^{are assessed by users} that provide the fundamental written guidance for routinely operating and maintaining the plant. ^{and during} Routine plant procedures that have not been used for two years will be reviewed before use to determine if changes are necessary or desirable. Routine plant procedures that have been used at least biennially may be excused from further review on the basis that they receive an appropriate degree of scrutiny by individuals knowledgeable in the procedures, and are updated as necessary to ensure adequacy during suitably controlled activities such as normal procedure usage, development of plant modifications, industry experience reviews, licensing actions, training activities, corrective actions for nonconforming conditions, and quality assurance audits and surveillances.

Nonroutine procedures are those procedures whose use is event-driven, such as Emergency Operating Procedures, Emergency Plan Implementing Procedures, Off-Normal Procedures, and Operational Transient Procedures; these procedures will be reviewed every two years. However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures ~~that are used more frequently than every two years.~~ The audit is to ensure the acceptability of the procedures and verify that the procedure review/assessment and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

Docket No. 50-271
BVY 01-57

ATTACHMENT 2

Vermont Yankee Nuclear Power Station

Supplement to Submittal of Proposed VOQAM Revision

Retyped Pages

VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

Alternative:

Plant procedures will be assessed for adequacy either periodically or continuously in accordance with administrative controls. When periodic review is used as the assessment method, these controls will establish a schedule for review.

All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

Routine procedures provide the fundamental written guidance for routinely managing, operating and maintaining the plant. Routine plant procedures are assessed by users before and during use to determine if changes are necessary or desirable. Routine procedures receive an appropriate degree of scrutiny by individuals knowledgeable in the procedures, and are updated as necessary to ensure adequacy during suitably controlled activities such as normal procedure usage, development of plant modifications, industry experience reviews, licensing actions, training activities, corrective actions for nonconforming conditions, and quality assurance audits and surveillances.

Nonroutine procedures are those procedures whose use is event-driven, such as Emergency Operating Procedures, Emergency Plan Implementing Procedures, Off-Normal Procedures, and Operational Transient Procedures; these procedures will be reviewed every two years. However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures. The audit is to ensure the acceptability of the procedures and verify that the procedure review/assessment and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.