

# VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET  
RUTLAND, VERMONT 05701

PC 68  
B.3.2.1  
WVY 80-18

January 25, 1980

REPLY TO:  
ENGINEERING OFFICE  
TURNPIKE ROAD  
WESTBORO, MASSACHUSETTS 01581  
TELEPHONE 617-366-9011

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation

- References:
- (a) License No. DPR-28 (Docket No. 50-271)
  - (b) VYNPC Letter WVY 77-100 to USNRC dated November 7, 1977;  
Proposed Change No. 68
  - (c) VYNPC Letter WVY 77-116 to USNRC dated December 29, 1977;  
Proposed Change No. 68, Supplement No. 1
  - (d) USNRC Letter to YAEC dated August 14, 1979

Dear Sir:

Subject: Vermont Yankee and Yankee Atomic Electric Company Organizations

Pursuant to Section 50.59 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following modification to Appendix A of the Operating License.

PROPOSED CHANGE:

Replace existing pages 191, 192, and 194 with the attached revised pages 191, 192, and 194. The revised pages reflect the current organizational structures of the Vermont Yankee Nuclear Power Corporation and Yankee Atomic Electric Company. It is intended that the revised pages transmitted by this letter supercede in their entirety those pages previously forwarded by References (b) and (c).

REASON FOR CHANGE:

Reference (c) was submitted to the NRC requesting a license amendment to delete the offsite and facility organizational charts from the Vermont Yankee Technical Specifications. It was felt that the information necessary to assure the Commission of the quality of the Vermont Yankee and Yankee Atomic Electric Company organizational structures was adequately described elsewhere in the Technical Specification and in the Yankee Operational Quality Assurance Program. Unfortunately, the Commission staff did not share our feeling that the change was justified and mutually beneficial in terms of reduced licensing involvement and paperwork. It was the NRC's feeling that the proposal would not allow for adequate licensing control and hence our request was denied, Reference (d). As a result of the Commission's denial of our request, the attached pages, which reflect the current Vermont Yankee Plant and offsite organizational structures and the current titles associated with each position, are being submitted for your approval.

Other changes are to maintain consistency and are not substantive.

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SAFETY CONSIDERATIONS:

This proposed change identifies the current Vermont Yankee and Yankee Atomic Electric Company Organizations. The changes are administrative in nature and do not diminish the combined expertise of the respective staffs.

This proposed change has been reviewed by the Nuclear Safety Audit and Review Committee.

FEE DETERMINATION:

This proposed change is pro forma, administrative in nature, and has no safety or environmental significance. For these reasons, Vermont Yankee Nuclear Power Corporation proposes this change as a Class II Amendment and a payment of \$1,200.00 is enclosed.

Vermont Yankee Nuclear Power Corporation believes that the NRC revised fee schedule is illegal. Vermont Yankee Nuclear Power Corporation is aware that an appeal of the decision of the U.S. Court of Appeals for the Fifth Circuit is being considered and, therefore, submits the enclosed fee under protest without waiving our right to contest the validity of this fee or the entire NRC fee schedule, and without waiving any right to recover, in whole or in part, all fees paid or to be paid under the invalid fee schedule.

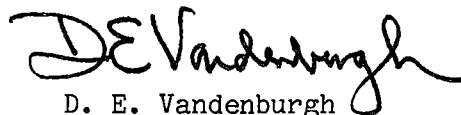
SCHEDULE OF CHANGE:

The changes described above will be incorporated into the Vermont Yankee Technical Specifications upon receipt of your approval.

We trust you will find this submittal satisfactory; however, should you desire additional information, feel free to contact us.

Very truly yours,

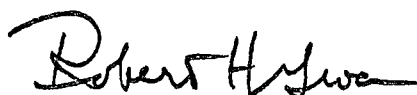
VERMONT YANKEE NUCLEAR POWER CORPORATION



D. E. Vandenburg  
Vice President

COMMONWEALTH OF MASSACHUSETTS)  
  )ss.  
COUNTY OF WORCESTER                      )

Then personally appeared before me, D. E. Vandenburg, who, being duly sworn, did state that he is Vice President of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing request 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.



Robert H. Groce                                   Notary Public  
My Commission Expires September 14, 1984