

VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET
RUTLAND, VERMONT 05701

TELEPHONE 802-775-2964

November 16, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20014

- References:
- (1) T. D. Keenan letter to Harold R. Denton dated October 1, 1979, Recommendations concerning NRR reorganization.
 - (2) Harold R. Denton letter to All Operating Nuclear Power Plants dated October 30, 1979, Discussion of lessons learned short-term requirements.
 - (3) Darrell Eisenhut letter to T. D. Keenan, Draft Version, Undated, Staff Positions on Owners' Group Report.

Dear Mr. Denton:

As you will recall, early last month I submitted to you for your consideration, a letter (Reference 1) discussing proposed organizational changes within NRR which we of the General Electric Boiling Water Reactor Owners' Group believed would make our organization more capable of dealing effectively with you and your staff on Three Mile Island issues. That letter was written because of a fundamental concern on my part that it was necessary to streamline the organizational relationships between NRR and our Owners' Group in order to optimize the utilization of resources and enable us to deal with the Three Mile Island issues in a more effective, coordinated and timely manner. At that time I expressed a willingness to meet with you and members of your organization to discuss the issues raised by that letter. I have not received either a response or acknowledgement of receipt of that letter and I can only assume that you have received it. I recognize that there are many other issues with which you must deal in this post Three Mile Island environment; nevertheless, I would like again to request that you give immediate serious consideration to the issues raised in that letter and provide me at your earliest opportunity with your thoughts and opinions on the recommendations made in that document. The inefficiencies, confusion and contradictory actions spoken of in that document have already, in my judgement, caused substantive problems within the BWR industry in its attempts to comply with the requirements of NUREG-0578, as discussed below.

1398 327

7911270 425
GOOG 5/10
ADD: H DENTON 1140

Mr. Harold R. Denton
November 16, 1979
Page 2

I am sure we all share a common desire to implement all of the requisite changes within the shortest possible time and in the safest possible manner. However, our Owners' Group is finding it increasingly difficult to carry out its responsibilities to the member companies of providing guidance and design standards for their use in meeting the requirements of NUREG-0578, in light of the continuing proliferation of changes exemplified by References (2) and (3). Our Owners' Group provided positions and design standards to one or more divisions within NRR on an informal basis as early as September 20, with a formal submittal on October 17 to Mr. Darrell Elsenhut, Acting Director, Division of Operating Reactors. Both preceding and following those submittals there were a series of discussions between members of the various NRR divisions and our Owners' Group to discuss and clarify our positions and the extent to which they satisfied the requirements of NUREG-0578. Our positions were submitted promptly after the regional and topical meetings took place and we believe they reflect the intent of the clarification statements made by task force members at those regional and topical NRC meetings.

It is very unfortunate, from my perspective, that at this late date we have before us requests for substantive modifications of a number of our positions (Reference 3), as well as substantive changes and additions to previously issued NRC positions on NUREG-0578. I have studied your October 30 letter and Reference (3), and have concluded that it is not possible for our Owners' Group to review in depth and provide within the fifteen day period, detailed positions which meet these new and modified requirements. It has thus been left to each individual member company to assess the document and make its own conclusions within that fifteen day period. Our Owners' Group, which was formed at the request of yourself and other senior members of NRR, has effectively been undermined in its ability to carry out its responsibilities. As stated previously, I share your desire to implement all of the necessary changes in the shortest possible time. However, due to the succession of changes and at times conflicting requirements, there is now insufficient time, in my judgement, for an adequate evaluation of the feasibility of meeting the requirements and assessing the effect of those requirements on the continued safe operation of the plants. Despite this, all companies are required to issue a document to you within fifteen days stating their intent to comply with all of the requirements within the original schedule. I would be remiss in my responsibilities as Chairman if I were not to object to this process.

Each licensee has the ultimate and direct responsibility to operate its power plant safely and be fully responsible for any design changes, modifications or commitments made regarding that nuclear power plant, as I am sure you will agree. The situation which now exists is as follows: We have been required by Reference (3), which exists as of the date of this letter only in draft, undated form, to modify our Owners' Group positions within three working days and submit those changes and our comments on them in our individual company responses required this week by your letter of October 30, Reference (2). It is not possible for our Owners' Group to carry out its obligations in a responsible manner within that time.

1398 328

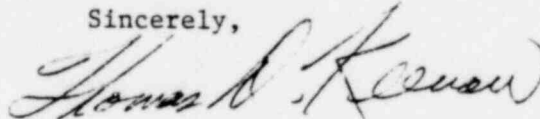
Mr. Harold R. Denton
November 16, 1979
Page 3

The fundamental requirement to which we all subscribe is that all of the necessary design changes and procedural modifications which have been necessitated as a result of the review of the lessons learned from the Three Mile Island accident, must be implemented within the shortest possible time. As previously indicated, subsequent to the initial issue of NUREG-0578, a long series of meetings, discussions, clarification letters, Owners' Group positions and follow-up discussions, meetings and exchanges of correspondence occurred. This process is still going on as of the date of this letter and yet the January 1, 1980 deadline date has not been modified to reflect the changes made by NRC which have gone on since the original issue of the NUREG document in July of this year. We have in effect, used up four months of a total of six in arriving at final design standards which will be required. Thus we have compressed the available time to make the changes from six months to six weeks.

While all operating nuclear power plant companies will do everything in their power to meet the deadline dates, I must strongly urge that you give serious consideration to the points raised in this letter when assessing the actual completion schedules submitted by each company in attempting to comply with NRR requirements regarding NUREG-0578.

Should you or other members of your organization desire an opportunity to meet with myself and other representatives of our Owners' Group to discuss these issues in more depth, I will be available to meet with you at any time, as previously offered.

Sincerely,



Thomas D. Keenan, Chairman
General Electric Boiling
Water Reactor Owners' Group

TDK/cmm

cc: Chairman Joseph M. Hendrie
Commissioner Victor Gilinsky
Commissioner Richard T. Kennedy
Commissioner Peter A. Bradford
Commissioner John F. Ahearne
Darrell G. Eisenhut

1398 329