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February 4, 1980

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

Attention: Darrell G. Eisenhut, Director Division of Operating Reactors

- References: (a) License No. DPR-28 (Docket No. 50-271)
 - (b) VYNPC letter (WVY 79-38) to USNRC dated April 4, 1979
 - (c) VYNPC letter (WVY 77-25) to USNRC dated March 7, 1977
 - (d) USNRC letter to YAEC dated January 8, 1979

Subject: Recirculation Pump Trip

Dear Mr. Eisenhut:

This letter is intended to amplify our commitment to the installation of a recirculation pump trip (RPT) system at Vermont Yankee. The commitment to install this system was reiterated in Reference (b) and originally made in Reference (c). Yankee Atomic Electric Company on behalf of Vermont Yankee Nuclear Power Corporation currently is engaged in extensive engineering design and equipment procurement program to enable installation of a safety grade (i.e. conforming to IEEE 279, 308, and 344) RPT system during the fall 1980 refueling outage. Shutdown for this outage currently is scheduled for September 26. It is our fullest intent that the plant not start up from this outage without an RPT system installed and functioning. Currently, the startup from this outage is scheduled for November 10, 1980.

Vermont Yankee Nuclear Power Corporation committed to an analog RPT system in March of 1977 (Reference c) and had not received confirmation of the adequacy of that proposal until January 1979 (Reference d). Independently, a decision was reached in late 1978 to replace the existing mechanical level switch and pressure switch based sensors and ancillary equipment for the Reactor Protective System (RPS) the Primary Containment Isolation System (PCIS), and the Emergency Core Cooling System (ECCS) with state-of-the-art analog trip system sensors. The original mechanical devices had been the source of several plant trips over the life of the facility caused by set points drift and inadvertent switch operation. The new analog system is expected to provide increased system reliability and plant availability because of greater precision and accuracy as well as significantly reduced surveillance manipulation with the attendant inadvertent demands on the plant protective system.

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In January of 1979 the RPT system project was integrated with the RPS/PCIS/ECCS system upgrade. The combined program consists of several phases, the first of which includes the RPT system in its entirety as well as portions of the upgrade to RPS and ECCS. Management of this effort has involved the coordination of eight separate organizations to achieve a complete design ready for installation and testing during October of 1980.

We are aware of your current interest in accelerating the installation of RPT's for all operating BWR's despite your previous two-year time frame provided in Reference (d). Because of our decision to integrate this effort with the extensive instrumentation upgrade, it is unlikely that completion will be realized much before October 1 because of equipment availability. Principle items include the battery and battery charger equipment from Exide, Power Systems Division and cabinet fabrication by York Electro-Panel Control Co. which is, in turn, dependent upon equipment to be delivered by Rosemont Inc.

We would be pleased to meet with your technical staff to provide you with the details of this program should you find that desirable. We would strongly urge your consideration of our particular circumstances before mandating an installation deadline for Vermont which cannot be accommodated.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

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D. E. Vandenburgh () Vice President

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