

VERMONT YANKEE NUCLEAR POWER CORPORATION



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BVY 89-105

REPLY TO
ENGINEERING OFFICE
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November 10, 1989

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

- References:
- a) License No. DPR-28 (Docket No. 50-271)
 - b) Letter, USNRC to All Holders of Operating Licenses or Construction Permits for Nuclear Power Reactors, NRY 88-248, Bulletin 88-10, dated 11/22/88
 - c) Letter, VYNPC to USNRC, BVY 89-32, Response to Bulletin 88-10, dated 3/31/89
 - d) Letter, VYNPC to USNRC, BVY 89-62, Supplemental Response to Bulletin 88-10, dated 6/30/89
 - e) USNRC Bulletin 88-10, Supplement 1, dated 8/3/89

Dear Sir:

Subject: Response to NRC Bulletin 88-10, Supplement 1,
Molded Case Circuit Breakers

USNRC Bulletin 88-10 [Reference b)] requested that addressees take action to provide reasonable assurance that molded case circuit breakers (CB's), including CB's used with motor controllers, purchased for use in safety related applications without verifiable traceability to the circuit breaker manufacturer (CBM) perform their safety functions. By letters dated March 31, 1989 [Reference c)] and June 30, 1989 [Reference d)], Vermont Yankee outlined the results, actions taken, and future actions planned as a result of our investigation.

Subsequent to the submittal of these two responses, USNRC Bulletin 88-10, Supplement 1, was issued. This Supplement provided additional actions as a result of clarification of the NRC's position with regard to the original Bulletin.

As part of these actions, the NRC requested that Licensees review written reports submitted to the NRC in accordance with Bulletin 88-10 and verify that the responses meet the Bulletin provisions as clarified by Supplement 1 of the subject Bulletin.

Pursuant to this request, Vermont Yankee hereby submits the conclusions of our review of the previously submitted responses to Bulletin 88-10.

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All previous responses to NRC Bulletin 88-10 have been reviewed against the additional clarification as presented in Bulletin 88-10, Supplement 1. All responses are considered valid with the exception of the following clarifications:

1. NRC Position 1 of Bulletin 88-10, Supplement 1, allows traceability to an original plant construction order as being sufficient traceability, provided they were received prior to August 1, 1983.

Vermont Yankee has thirteen such breakers that were purchased in the 1970/71 timeframe under our original Construction Purchase Order. Therefore, Vermont Yankee will consider these breakers as acceptable for safety related applications.

2. NRC Position 4 requests licensees to assess the acceptability of all installed safety related MCCB's that were procured under the same purchase orders as the non-traceable MCCB's identified in the original response to Bulletin 88-10.

Vermont Yankee has completed its review of MCCB's installed between December 1975 and August 1983. This review has identified six installations which were purchased under previously identified non-traceable Purchase Orders. These breakers will be handled in accordance with the requirements of action items 2, 5, and 6 of Bulletin 88-10 [Reference b)].

3. NRC Position 5 indicates that non-traceable MCCB's being retained as spares may not be used in safety related applications even if they have passed all testing requirements as specified by Attachment 1 of Bulletin 88-10.

This position is contrary to the direction in which Vermont Yankee was proceeding as described in our earlier submittal [Reference d)]. Therefore, in order to comply with the requirements of NRC Position 5 of Bulletin 88-10, Supplement 1, Vermont Yankee will not test the spare MCCB's in stock but rather remove them from stock as safety related spares.

CONCLUSIONS

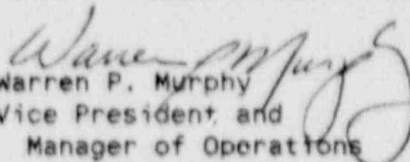
In accordance with the requirements of NRC Bulletin 88-10 and 88-10, Supplement 1, Vermont Yankee has initiated a program to provide reasonable assurance that MCCB's purchased for use in safety related applications without verifiable traceability to the CBM can perform their safety function.

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We trust that the information provided is responsive to the subject Bulletin; however, should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President, and
Manager of Operations

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cc: USNRC Regional Administrator, Region I
USNRC Resident Inspector, VYNPS