



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION 1  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

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Docket No. 50-271

APR 28 1981



Vermont Yankee Nuclear Power Corporation  
ATTN: Mr. Robert L. Smith  
Licensing Engineer  
1671 Worcester Road  
Framingham, Massachusetts 01701

Gentlemen:

Subject: Inspection 50-271/80-22

This refers to your letter dated April 9, 1981, in response to our letter dated March 17, 1981.

Based on an April 17, 1981 telephone conversation between Mr. Richard Burke, of your staff, and Messrs. Robert Gallo and William Raymond, of this office, we understand that, with regard to the changes made to Step A.10 of Appendix B to OP 4029, Vermont Yankee acknowledges that the changes can neither be classified as typographical in nature nor as "valve positions required to be different as dictated by system status", and therefore, changes to this section should have been accomplished under the provisions of Technical Specification 6.5.D and your procedure AP 0002.

We also understand that the following actions will be undertaken and completed prior to further use of an exceptions list in a procedure governed by Technical Specification 6.5.A or 6.5.B requirements to avoid further violations.

1. Develop and implement a change to OP 4029 to define "exceptions" consistent with the following: "Temporary changes to the status of plant equipment as required by the conditions of the plant that do not change the intent of the activity in progress or effect safe operation of the facility."
2. Develop and implement a method such that changes made to OP 4029 that qualify as exceptions will be required to be listed on the applicable exceptions list with concurrence of the shift supervisor documented.

These actions will be examined during a future inspection of your licensed program. If our understanding is incorrect, please contact this office within seven days.

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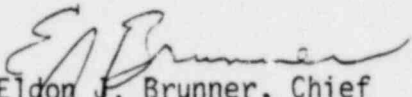
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Regarding changes made to Steps A.1 and A.3 of Appendix B to OP 4029, we note that these changes were for the correction of typographical errors and, as such, were not proper for incorporation in a citation against the requirements of Technical Specification 6.5.D. We, therefore, withdraw those changes from consideration in the Notice of Violation.

Your cooperation with us is appreciated.

Sincerely,

  
Eldon J. Brunner, Chief  
Projects Branch #1, Division of  
Resident and Project Inspection

cc:

Warren P. Murphy, Plant Superintendent  
W. F. Conway, Vice President and Manager of Operations  
J. E. Griffin, President  
L. H. Heider, Vice President