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WW 78-93

October 13, 1978

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

Attention: Office of Nuclear Reactor Regulation  
T. A. Ippolito, Chief  
Operating Reactors Branch 3  
Division of Operating Reactors

- References:
- a) License No. DPR-28 (Docket No. 50-271)
  - b) VYNPC Letter (WVY 78-74) to T. A. Ippolito from D. E. Moody, dated August 14, 1978, Subject: Fire Brigade Manpower Requirements and Prefire Strategies
  - c) USNRC Letter to R. H. Groce from T. A. Ippolito, dated August 9, 1978, Subject: Staff Positions on Fire Protection Administrative Controls
  - d) VYNPC Letter (WVY 78-86) to T. A. Ippolito from D. E. Moody, dated September 7, 1978, Subject: Fire Protection Program Administrative Controls
  - e) USNRC Letter to R. H. Groce from R. W. Reid, dated August 4, 1977, Subject: Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls and Quality Assurance

Dear Sir:

Subject: Fire Brigade Drill Schedule

Reference c) above transmitted to us a staff position that fire drills should be performed at regular intervals but not to exceed three months for "each" fire brigade. At least one drill per year should be performed on a "back shift" for "each" fire brigade. A sufficient number of these drills, not less than one for "each" fire brigade per year, shall be unannounced, to determine the fire readiness of the plant fire brigade leader, brigade, fire protection systems and equipment.

The staff concern leading to the promulgation of that position was that the proposed frequency for fire brigade drills did not provide adequate training to assure brigade members can function effectively as a team in the use of fire fighting equipment and tactics to suppress fires manually.

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We have reviewed the concerns expressed by the staff and have slightly modified our proposal for drill scheduling and frequency.

We agree with the staff that drills are necessary to assure that fire brigade members can function effectively as a team on the use of fire fighting equipment and tactics to suppress fires manually. We disagree, however, with the staff contention that four drills per brigade per year are necessary and that they should be held quarterly. We feel that our modified proposal, will adequately drill brigade members and, answers the concerns of the staff. In making this proposal, we are assuming that Reference b) above, which addressed fire brigade size, composition, and training has been accepted, although we have received no notice of that acceptance.

Vermont Yankee proposes to provide two drills per year for each operating shift fire brigade. As we have five operating shifts, this would provide a total of ten drills per year. One drill will be provided on the back shift for each brigade and one drill will be unannounced for each brigade. One drill of the ten held each year will be held with the participation of the Town of Vernon Fire Department.

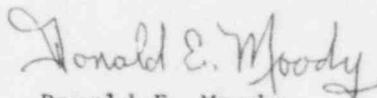
The drill program outlined by your staff in Reference e) which seems to be the basis for four drills has two basic goals. First, to assess the overall training and effectiveness of the Fire Brigade Training Program and, second, to assess the effectiveness and availability of fire fighting equipment. The insistence on any set number of drills per fire brigade each year does not insure the accomplishment of these goals. We are unaware of any National Fire Protection Association documents which even recommend a set number of drills to be held by an industrial fire brigade. These documents, in particular (NFPA 27-Private Fire Brigades, NFPA Fire Protection Handbook, 14th Edition, and Training Manual for Industrial Fire Brigades) emphasize the need for drills but do not prescribe any periodicity. Vermont Yankee feels that ten drills/year will provide ample review of the brigade performance to assure that brigade training goals are being met. All drill critiques will be reviewed by the entire brigade and thus all brigade members will learn from the drills. This is the same sound philosophy which is applied to site emergency drills which are only required once each year.

In summary, Vermont Yankee feels the insistence on four drills for each brigade each year is arbitrary and unnecessary. Vermont Yankee plans to institute a program of two drills per brigade each year which, combined with the existing training program, will provide a more than adequate fire brigade.

We trust that this proposal will, after your careful review of our bases, meet with your approval. We intend to implement it starting with our next training cycle.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Donald E. Moody  
Manager of Operations