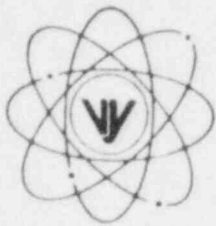


VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

2.C.2.1
FVY 82-104

REPLY TO:
ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

September 14, 1982

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

Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

References:

- (a) License No. DPR-28 (Docket No. 50-271)
- (b) Letter, D. G. Eisenhower to All Licensees of
Operating Plants, dated October 31, 1980
- (c) VYNPC Letter No. WVY 80-151, dated
October 23, 1980
- (d) VYNPC Letter No. WVY 80-170, dated
December 15, 1980
- (e) VYNPC Letter No. FVY 81-08, dated
February 1, 1982
- (f) VYNPC Letter No. FVY 81-77, dated May 12, 1981
- (g) USNRC Letter to VYNPC, dated July 21, 1981
- (h) VYNPC Letter No. FVY 82-78, dated June 28, 1982
- (i) USNRC Letter to VYNPC, dated July 13, 1982

Dear Sir:

Subject: Shift Staffing Requirements of NUREG-0737, Item I.A.1.3.2

In References (c), (d), and (e), we committed to meet the shift staffing requirements of NUREG-0737 outlined in Reference (b). As we stated in Reference (e), this commitment was based on the ability to license at least seven of the nine candidates in the Hot License Program at that time. The results of the licensing applications were received in mid-July. Since only four of the candidates received Reactor Operator Licenses, we were not able to implement our commitment.

Our need to obtain seven more licensed individuals was based on the requirements to adequately man the shifts without exceeding our overtime guidelines, to provide for the required retraining programs, and to conduct an SRO Upgrade Program.

We are actively pursuing an ambitious licensing program to meet these needs. We hope to have four reactor operator candidates complete their examinations by October 1982, two other senior reactor

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candidates complete their examinations by March 1983, and seven reactor operator candidates complete their examinations by May 1983. Based on our most recent licensing examinations, we would expect that the NRC will issue the results of the examinations three months after they are completed. Considering this lead time for the final determination of licenses, we anticipate full implementation of NUREG-0737, Item I.A.1.3.2 by August 1983.

In the interim period, we intend to make our best effort to meet the intent of the NUREG with our available licensed operations staff. We will have at least two licensed senior reactor operators and one licensed reactor operator on shift during all non-cold shutdown reactor operations. In addition, there will periodically be an additional licensed operator on shift depending on the shift schedules of our current licensed operators. For all preplanned reactor power maneuvers of greater than 20%, we will assure that four licensed operators are on shift. At least two of the four will be senior licensed.

In Reference (f), we requested that the NRC authorize the use of our Shift Technical Advisors as fire brigade leaders. This was intended as an interim measure until July 30, 1982, to allow us time to resolve the question of shift staffing for normal and emergency situations. Also, in Reference (f), we advised you that we felt that the Shift Technical Advisor was the best person to assume the position of fire brigade leader. We have recently completed our evaluation of our shift staffing requirements and conclude that the Shift Technical Advisor should remain as the brigade leader. This conclusion is based on our analysis that using the STA, as brigade leader, is in concert with his primary role of providing engineering support duties for the Shift Supervisor. Our position is further supported by our desire to maximize the number of licensed operators immediately available to the Shift Supervisor during an off normal condition and a continuing desire to more fully integrate the STA into the operating crew.

We will propose revised shift staffing Technical Specifications once we are capable of being fully staffed as explained above. Based on our review of the proposed rule to 10 CFR 50.54 published in the Federal Register on August 30, 1982, specifically the criteria that the NRC will use to review licensee requests for implementation schedule extensions, we believe that the information/interim actions described above justify our course of action.

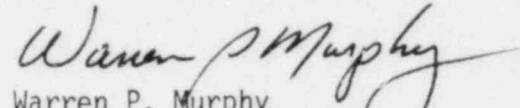
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We trust this information is acceptable; however, should you desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

A handwritten signature in dark ink, appearing to read "Warren P. Murphy". The signature is fluid and cursive, with a large, sweeping "M" and a long, horizontal flourish extending to the right.

Warren P. Murphy
Vice President-Manager of Operations

WPM/jh