## VERMONT YANKEE NUCLEAR POWER CORPORATION



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March 29, 1994 BVY 94-37

United States Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

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 Plants, NVY 89-156, Generic Letter 89-13, dated 7/18/89
  - (c) Letter, VYNPC to USNRC, BVY 90-007, Response to Generic Letter 89-13, dated January 22, 1990
  - (d) NRC Information Notice 94-03, Deficiencies Identified During Service Water Operational Performance Inspections, dated January 11, 1994

## Subject: Review of Generic Letter 89-13 Implementation, Vermont Yankee Service Water Self Assessment

By letter dated January 22, 1990 [Reference (c)], Vermont Yankee provided a description of plans and programs that addressed the issues described in Generic Letter 89-13. We have recently completed a Self Assessment of our Service Water System, including a review of our program to meet Generic Letter 89-13 which identified that several aspects of our program do not fully meet the intent of the Generic Letter.

Specific weaknesses include lack of formal procedures for testing of equipment, weak maintenance practices to ensure Service Water System components are properly maintained, lack of technical evaluations to establish inspection and maintenance frequencies, and weak design reviews to ensure the Service Water System would operate properly under all design basis configurations.

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Following the completion of this Self Assessment, Vermont Yankee assigned a dedicated project team to evaluate the issues identified in the Self Assessment which will include a detailed evaluation of the Vermont Yankee program to meet Generic Letter 89-13. This project team is currently in place and developing action plans and milestones to address these issues. Additionally, the team will be reviewing Information Notice 94-03, [Reference (d)] to ensure our program is complete. An updated response will be provided on Generic Letter 89-13 once a definitive plan has been established.

Vermont Yankee will submit a complete response to Generic Letter 89-13 no later than the end of 1994. We trust that the information contained in this letter is satisfactory; however, should you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

VT YANKEE NUCLEAR POWER CORP.

James Pellitre

James P. Pelletier Vice President, Engineering

cc: USNRC Region I Administrator USNRC Resident Inspector - VYMPS USNRC Project Manager - VYMPS