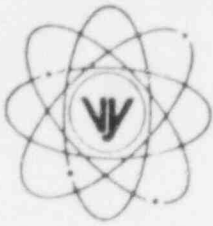


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

2.C.2.1
FVY 82-108

REPLY TO:

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

September 28, 1982

U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Richard W. Starostecki, SALP Board Chairman
Director, Division of Project and Resident Programs

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) USNRC Letter dated August 26, 1982 (SALP Report)

Dear Sir:

Subject: SALP Report Comments

We appreciated the opportunity to meet with you on September 8, 1982, to discuss the most recent SALP report on Vermont Yankee. We feel that the report is a fair appraisal of our activities for the report period, however, there are a few areas in the report that require clarification and/or correction.

Section I - Introduction

Item 1.3.1 - Licensee Activities

The reference to the conditions contributing to the October 26, 1981 scram is inaccurate. The scram occurred as a direct result of a specific management decision to attempt to gather dynamic data on the Mechanical Pressure Regulator just prior to a scheduled shutdown. The MPR was not being returned to service following repairs as this item indicates.

Section IV. - Performance Analysis

Item 1 - Plant Operations

We disagree with the statement that our interpretation of the Technical Specifications relative to the SLC boron concentration was "incorrect." Section 3.4.D of the Technical Specifications excludes the boron concentration requirements as a Limiting Condition for Operation. We do believe, however, that the requirements should be a part of the specification and on July 22, 1982, we submitted a proposed change to the NRC to have it included.

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VERMONT YANKEE NUCLEAR POWER CORPORATION

U.S. Nuclear Regulatory Commission
September 28, 1982
Page 2

We take exception to the statement that our interpretation of the Tech Specs relative to containment isolation was "incorrect and nonconservative." We believe that our action of isolating the line with a downstream manual valve was appropriate and adequate to maintain Primary Containment. We will supply the NRC with a letter describing the basis for this conclusion.

In reference to the statement our "failure to resolve turbine control system problems," it should be recognized that we have taken extensive measures over the last several years to identify and correct the problems in this area as they occur. In addition, we have greatly expanded the scope of preventative maintenance on these systems. Although these efforts have not completely eliminated the possibility of problems, we feel that we have made substantial progress in identifying and implementing the proper action to make the system more reliable.

Based on the above comments to Item 1 of Section IV, we feel that there are no adverse trends developing that may be indicative of weakness in our management controls.

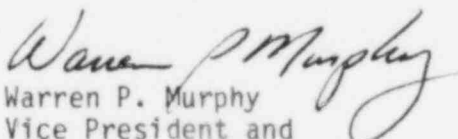
Item 5 - Fire Protection/Housekeeping

The manhours devoted to the function of Fire Protection Coordinator have remained substantially constant over the last several years. There is no intention to reduce the manhours or the scope of the coordination function. The internal changes that have been made or proposed relate only to a delegation of certain of the duties to other personnel under the cognizance of the Fire Protection Coordinator.

If you have any questions relative to the above comments, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm