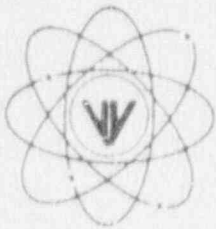


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
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United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

January 17, 1991
BVY 91-09

References: a. License No. DPR-28 (Docket No. 50-271)
b. Letter, USNRC to VYNPC, NVY 90-215, dated December 4, 1990.

Subject: Conformance To Regulatory Guide 1.97 For Vermont Yankee Nuclear Power
Station

Dear Sir:

Reference (b) transmitted the NRC Safety Evaluation Report (SER) pertaining to VY conformance to Regulatory Guide 1.97 along with a Technical Evaluation Report (TER) prepared by EG&G Idaho, Inc. dated, May, 1990. In this letter the NRC stated that they found the instrumentation provided by Vermont Yankee Nuclear Power Corporation for meeting the recommendations of R.G. 1.97, Revision 3, acceptable, except for two variables. These two variables were found to be needing additional attention. Specifically, you stated:

"We find that the instrumentation provided by Vermont Yankee Nuclear Power Corporation for meeting the recommendations of R.G. 1.97, Revision 3, acceptable, except for the following variables: neutron flux and cooling water temperature to ESF components. The staff's position on neutron flux has been appealed by the BWR Owners Group and is currently under consideration."

Neutron Monitoring

The necessity of installing a R.G. 1.97, Category 1, neutron flux monitoring system has been appealed by the BWR Owners Group. The staff is currently considering this appeal. Vermont Yankee supports the BWR Owners Group in this endeavor. The staff has concluded that, "... the existing neutron flux monitoring instrumentation is acceptable for interim operation until implementation of a fully qualified indication system is complete."

Notwithstanding the outcome of the appeal, Vermont Yankee considers its existing neutron flux indication system adequate. This position is based on the determination that the existing LPRM system at VY is environmentally qualified. This upgrade has been accomplished through the implementation of several design modifications. Vermont Yankee does not intend to perform any modifications to this system at this time.

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Cooling Water Temperature to ESF Components

Section 3.0 (b) of the SER states the following:

"The licensee has provided instrumentation which conforms to the Category 2 criteria of R.G. 1.97 except for the range. The licensee did not provide a justification for this deviation. Therefore, the licensee should provide the range recommended by R.G. 1.97."

For clarification, Vermont Yankee took exception to the range and to the Environmental Qualification (E.Q.) requirements recommended in R.G. 1.97. Both exceptions were identified in our September 1, 1989 submittal update. Furthermore, the Technical Evaluation Report (TER) provided to you by EG&G (Idaho), dated May 1990, noted the exception taken regarding E.Q. for this parameter. In section 3.3.9 of that report the reviewer determined that using the instrumentation associated with this parameter, as a backup variable, precluded the necessity of imposing 10CFR50.49 requirements on it. This issue is brought to your attention for clarification only. Vermont Yankee intends no further action regarding E.Q.

The range discrepancy can be readily justified. The temperature indication range identified in our September 1989 submittal update is 0 to 150 F. The 150 F limit was not based on the upper range of the temperature monitoring system. It was used as the upper limit because the design temperature of the piping being monitored is 150 F. In reality, the temperature loops associated with this parameter are calibrated to monitor a range of 0 to 600 F. The inputs are provided to an L&N multipoint recorder, TR 23-115 (previously identified as TRS 10-131). This range encompasses the R.G. 1.97 requirements of 0 to 200 F. Therefore, it is Vermont Yankee's position that the existing temperature loop is acceptable as is. Vermont Yankee intends no further action regarding the range of these variables.

We trust the information provided above adequately explains VY's position concerning the subject R. G. 1.97 variables; however, if you have any questions or desire additional information, please do not hesitate to contact us.

Very truly yours,

Vermont Yankee Nuclear Power Corporation

M. J. Mariani, Sr.

Leonard A. Tremblay, Jr.
Senior Licensing Engineer

cc: USNRC Regional Administrator, Region I
USNRC Resident Inspector, VYNPS
USNRC Project Manager, VYNPS