VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-42

ENGINEERING OFFICE

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

May 1, 1984

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

Attention:

Mr. Thomas T. Martin, Director

Division of Engineering and Technical Programs

References:

(a) License No. DPR-28 (Docket No. 50/271)

(b) Letter, USNRC to VYNPC, dated 9/30/83, and Inspection Report No. 83-22, Appendix A (Notice of Violation)

(c) Letter, VYNPC to USNRC, dated 10/26/83, Response to Inspection Report 83-22

(d) Letter, USNRG to All Operating Reactors, dated 7/8/83

(e) Letter, VYNPC to USNRC, Initial Response to Reference (d), dated 11/7/83

Dear Sir:

Subject:

Notification of Extension of Commitment Date

Per our original responses to Items A and C of Reference (b) and Item 3.1.1 of Reference (d), we committed to address the concerns of the Commission in a revision to our Maintenance Request Procedure, AP 0021, due to be issued by May 1, 1984. The purpose of this letter is to notify you of an extension of the completion of this action to November 1, 1984.

We have completed our evaluation of the need to change this procedure, and have determined that the nature of the required changes is such that it would not be prudent or practical to institute the procedure revision so close to the start of the 1984 Refueling Outage, scheduled to begin on June 16. The revised procedure contains significant modifications in process controls which will require retraining of all affected Engineering Support, Operations, Maintenance and I&C Department personnel. There is insufficient time, given the outage preparation work load, to complete this training in an orderly manner before mid-June, and to institute the revision without such retraining would cause excessive confusion which could detract from the quality of work performed under this procedure during the outage. Consequently, we believe a deferral of implementation is warranted.

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The deficiencies identified in Items A and C of Reference (b) were in many cases caused by failure of plant personnel to properly implement the requirements of the current revision of AP 0021. The retraining of all Operations, Engineering Support, Maintenance and I&C Department personnel in the proper implementation of AP 0021, Rev. 11, which was accomplished by December 15, 1983 in accordance with our response to Item A of Reference (b) will serve to reduce the likelihood of similar occurrences until the revised procedure can be implemented.

We trust that this information will be satisfactory; however, should you have any questions or desire further information, please contact us.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Warren F. Murphy Vice President and

Manager of Operations

WPM/dm

cc: U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attn:

Office of Nuclear Reactor Regulation Mr. Domenic B. Vassallo, Chief Operating Reactors Branch No. 2 Division of Licensing