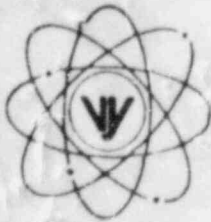


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-85

REPLY TO:

ENGINEERING OFFICE

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

July 10, 1984

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

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

References: a) License No. DFR-28 (Docket No. 50-271)
b) Letter, VYNPC to USNRC, FVY 81-117, dated 7/31/81
c) Letter, VYNPC to USNRC, FVY 82-72, dated 6/16/82
d) Letter, USNRC to VYNPC, FVY 82-119, dated 11/12/82
e) Letter, USNRC to VYNPC, Nvy 83-05, dated 1/13/83

Dear Sir:

Subject: Request for Exemption - 10CFR Part 50, Appendix R, "Fire
Protection Program for Nuclear Power Facilities Operating
Prior to January 1, 1979

In accordance with the provisions of 10CFR Part 50.12, Vermont Yankee Nuclear Power Corporation hereby requests an exemption from the provisions of 10CFR Part 50, Appendix R, Section III.G, "Fire Protection of Safe Shutdown Capability". Specifically, we are requesting exemption from the provision of Section III.G.1.a to Appendix R. Section III.G.1.a requires that, "One train of systems necessary to achieve and maintain hot shutdown conditions from either the control room or Emergency Control Station(s) is free of fire damage."

Our Appendix R, Alternate Safe Shutdown System, which was designed to address a fire in the Control Room, Switchgear Rooms and Cable Vault, and is described in detail in Reference b), includes instruments powered from the 24 Volt Battery System located in the Reactor Building, which are used to achieve hot shutdown. To address the requirements of 10CFR 50.49, "Environmental Qualification of Safety-Related Electrical Equipment," it has become necessary to relocate the battery chargers for the 24 Volt Battery System from the Reactor Building to the Switchgear Rooms.

In the event of a fire in the Cable Vault, the 24 volt battery chargers would be disabled. The associated batteries, which carry only post-fire loads, would be discharged in 24 hours, according to our calculations. To address the loss of these battery chargers, we will install a spare battery charger in the Reactor Building. Leads from the spare charger will be run to the distribution panel, be lugged, and taped back. This installation will be completed during

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VERMONT YANKEE NUCLEAR POWER CORPORATION

our 1984 refueling outage with the exception of one breaker which will not be delivered until September. Until the new breaker is installed, the existing breaker to one of the 24 volt battery chargers will be removed and used to supply the spare battery charger should it become necessary.

Because Section III.G.1.a does not allow for repairs to achieve and maintain hot shutdown, we are requesting an exemption from this provision. Appropriate procedures will be in place to provide for the shifting of the battery charger leads to the spare charger and installation of the breaker within 24 hours of a fire in the Cable Vault. Section III.G.1.b allows repairs to achieve cold shutdown within 72 hours. We believe that shifting battery charger leads is consistent with this philosophy.

Based on the time available to perform this action, and the availability of the spare battery charger, we believe that the public health and safety is protected in a fashion equivalent to that resulting from compliance with the technical requirements of Section III.G.1.a of Appendix R.

We trust that this request is deemed acceptable; however, should you have any questions in this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Warren P. Murphy
Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm
STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Warren P. Murphy, who, being duly sworn, did state that he is Vice President and Manager of Operations of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation and that the statements therein are true to the best of his knowledge.



Diane M. McCue
Diane M. McCue Notary Public
My Commission Expires February 10, 1987