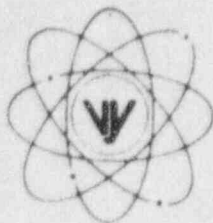


VERMONT YANKEE NUCLEAR POWER CORPORATION



P.O. Box 157, Governor Hunt Road
Vernon, Vermont 05354-0157
(802) 257-7711

November 20, 1995
BVY 95-127

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

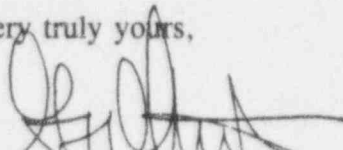
Attn: Document Control Desk

References: Operating License DPR-28
Docket No. 50-271
Reportable Occurrence No. LER 95-014 Supp. 2

Dear Sir:

As defined by 10 CFR 50.73, we are reporting the attached Reportable Occurrence as LER 95-014, Supplement 2.

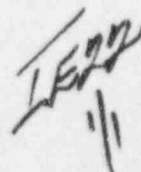
Very truly yours,


for Robert J. Wanczyk
Plant Manager

RJW/dm

cc: Regional Administrator
USNRC
Region I
475 Allendale Road
King of Prussia, PA 19406

9511270161 951120
PDR ADOCK 05000271
S PDR



NRC Form 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER)				APPROVED BY OMB NO. 3150-0104 EXPIRES 04/30/98 ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.							
FACILITY NAME (1) VERMONT YANKEE NUCLEAR POWER STATION						DOCKET NUMBER (2) 05000271		PAGE (3) 01 OF 07			
TITLE (4) INCOMPLETE IMPLEMENTATION OF 10CFR50 APPENDIX "R" BASED ON IDENTIFIED DEFICIENCIES IN THE SAFE SHUTDOWN CAPABILITY ANALYSIS											
EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NO.(S)	
07	25	95	95	-- 014 --	02	11	20	95	N/A	05000	
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: CHECK ONE OR MORE (11)									
N		20.2201(b)		20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)			
POWER LEVEL (10) 94%		20.2203(a)(1)		20.2203(a)(3)(i)		X 50.73(a)(2)(ii)		50.73(a)(2)(x)			
		20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71			
		20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(?) (iv)		OTHER			
		20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		(Specify in Abstract below or in NRC Form 366A)			
		20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)					
LICENSEE CONTACT FOR THIS LER (12)											
NAME ROBERT J. WANCZYK, PLANT MANAGER							TELEPHONE NO. (Include Area Code) 802-257-7711				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	
NA					NA					
NA					NA					
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED SUBMISSION DATE (15)		MO	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE)				X	NO						

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On 07/25/95, at 1410 hours, an ongoing review of documents and correspondence associated with 10CFR50 Appendix "R" determined that the "hot short" concern described in NRC Information Notice 92-18 was applicable to Vermont Yankee such that the operation of various Motor Operated Valves, from Alternate Shutdown Panels, could be impacted in the event of a fire in one of four plant areas. Subsequent to this discovery, additional Appendix "R" vulnerabilities were identified such that certain fire scenarios could result in loss of the Reactor Core Isolation Cooling (RCIC) system in the Alternate Shutdown mode, or inadvertent primary system depressurization. Also in question is the ability to initiate RCIC from the Alternate Shutdown Panel in the time necessary to meet Appendix "R" requirements. The root cause(s) of these events have been thoroughly investigated by an independent, multi-disciplined task team and are described in this supplement to LER 95-14. Full compliance with Appendix "R" requirements, without the need for crediting the compensatory measures detailed in this report, will be achieved by no later than the end of the 1996 Refueling Outage.

This supplement to LER 95-14 provides the findings of the Root Cause Analysis task team, provides an update on other Appendix R compliance issues, updates commitments from LER 94-11 and 95-03, updates corrective action status and describes additional corrective actions identified by task team investigations.

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DESCRIPTION OF EVENT

On 07/25/95, at 1410 hours, with the reactor at 94% of rated power, an ongoing review of documents and correspondence associated with 10CFR50 Appendix "R" determined that the "hot short" concern described in NRC Information Notice 92-18 was applicable to Vermont Yankee such that the operation of various Motor Operated Valves (MOV) from Alternate Shutdown Panels could be impacted in the event of a fire in certain plant areas. Specifically, the issue involves the potential impact of a fire in the Control Room, Cable Vault, or Reactor Building Fire Zones RB-1 or RB-3, on plant equipment relied upon in the Vermont Yankee Safe Shutdown Capability Analysis (SSCA) for placing and maintaining the reactor in "cold shutdown." This condition potentially renders the plant outside design basis in that it is not enveloped by the present Appendix "R" analysis. Based on this discovery, the Resident NRC Inspectors were briefed, and compensatory measures (fire watches) were promptly put into place such that the intent of 10CFR50 Appendix "R" was satisfied. In addition, copies of the associated Event Report and NRC Information Notice 92-18 were placed in the Operations Night Order Log Book for heightened operator awareness of the issue.

On 07/26/95, the subject "hot short" Event Report was reviewed at length by the Plant Operations Review Committee (PORC). Topics of discussion included: 1) the need to review actions contained within the related operating procedures, 2) the questioning of the potential for Safety Relief Valve (SRV)(EIS=SB) cable vulnerability, and 3) the recommendation to develop a task force to pursue resolution of this issue. Based on the PORC meeting, an Operations Standing Order was issued to establish formal guidance on the implementation of additional fire prevention controls in the susceptible areas, and convey management's intent to have operators initiate a reactor SCRAM and bring the plant to "cold shutdown" in the event of a confirmed fire that affects plant equipment in the Control Room, Cable Vault, or in Reactor Building Fire Zones RB-1 or RB-3. These compensatory measures were discussed at the 07/27/95 plant management morning meeting for increased awareness of the current Appendix "R" issues.

On 07/27/95, a followup to one of the questions raised by PORC during their review of the "hot short" concern identified a deficiency in the SSCA relative to the specific response to a fire in Reactor Building Zone RB-3. The analysis credits use of the Reactor Core Isolation Cooling (RCIC) system (EIS=BN) in the Alternate Shutdown mode, and repair of a cable for manual operation of a Safety Relief Valve. However, it was determined that additional wire and terminations for the SRV could be damaged for a fire in this area, making repair of the circuit unachievable. As a result, on 07/28/95, at 0000 hours, with the reactor at 100% of rated power, an event report for this issue was submitted, and compensatory measures were taken to satisfy the intent of Appendix "R" requirements.

On 07/28/95, Vermont Yankee management announced the formation of three task force teams to investigate the recently identified Appendix "R" issues. At the 07/31/95 plant management morning meeting, the function and scope of review of these (Evaluation, Design Change, and Self Assessment) teams were outlined. Subsequently, investigations by the task teams identified additional Appendix "R" vulnerabilities in the same plant fire zone areas. Specifically, under certain fire scenarios, loss of RCIC function in the Alternate Shutdown mode or inadvertent primary system depressurization could result from fire damage to RCIC or SRV cabling. Based on this, the existing compensatory (fire watch) measures were readjusted to account for the additional findings.

On 08/17/95, the formation of a fourth independent, multi-discipline Root Cause Analysis team was announced. This team completed a formal root cause analysis of the subject Appendix "R" events on September 22, 1995.

On 08/23/95, at 1030 hours, with the reactor at 100% of rated power, the ongoing review of Appendix "R" issues identified that the computer output documentation associated with the calculation which established the time available to get Alternate Shutdown Systems in-service could not be found, and the results of this calculation could not be validated utilizing present day analysis techniques. The original calculation, performed in 1981, determined that 43 minutes were available.

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Recent re-analysis, however, indicates that a period of 31 minutes can be justified at this time. Based on the current evaluation using conservative design basis assumptions, there may be insufficient time for operators to initiate RCIC in the Alternate Shutdown mode in the time necessary to meet Appendix "R" requirements. As a result, this concern was immediately brought to management's attention, an event report was submitted, and additional (firewatch and personnel awareness) measures remain in place to compensate for the discrepancy.

On 08/23/95, at 1705 hours, with the reactor at 100% of rated power, an Appendix "R" related issue associated with RCIC steam isolation logic was identified. It was determined that some of the high temperature sensors used to identify and isolate a RCIC high energy line break (HELB), may be susceptible to inadvertent actuation during certain fire scenarios. This could potentially result in an isolation of the RCIC turbine steam supply where the system is currently taken credit for in the Safe Shutdown Capability Analysis. The analysis relies on the use of RCIC for a fire in Reactor Building Fire Zone RB-2 and identifies the potential need for operator actions in manually operating various RCIC valves for system operations. However, the potential closure of the RCIC steam isolation valves was not identified. As a result, this issue was immediately brought to management's attention, an event report was submitted, and additional (firewatch and personnel awareness) measures were put in place to compensate for the discrepancy.

On 09/10/95, the formation of an Appendix "R" Project Team consisting of senior personnel from the Vermont Yankee and Yankee Atomic organizations was announced. The primary mission of this team will be to: 1) address all open issues identified by the analysis teams, 2) rewrite the Safe Shutdown Capability Analysis, 3) identify any necessary design changes, and 4) ensure the Vermont Yankee Appendix "R" Program becomes a well documented and comprehensive program.

On 10/20/95 Vermont Yankee identified that 3 issues identified at WNP-2 in NRC Inspection Report 50-397/94-2 may be applicable to Vermont Yankee. The issues involve potential RHR pump damage, potential RHR system water hammer, and potential bypass of reactor vessel overfill protection. Vermont Yankee has concluded that these issues are not addressed in the current Appendix R analysis and potentially render Vermont Yankee outside of its design basis and that the existing compensatory actions adequately address these issues. These issues will be addressed by the Appendix R Project Team.

Vermont Yankee has also initiated the following evaluations to document findings and corrective actions on Appendix R issues. These items have been determined not to be reportable but are included in this LER for information. These items are being addressed by our current compensatory actions and by the Appendix R Project Team.

On 10/31/95 Vermont Yankee initiated an evaluation of issues identified by the Appendix R Assessment Team regarding the exact location of the Combustible Free Zone (CFZ) in the Northwest Torus Area and proper application of fire retardant material on cable trays within the CFZ. These items are being addressed by our current compensatory actions and by the Appendix R Project Team.

On 10/31/95 Vermont Yankee initiated an evaluation of issues identified by the Assessment team regarding: 1) identification of two uncoated cables within a CFZ, 2) identification of two cable trays which were not included in the procedure for fire barrier surveillance, 3) identification of conduits spanning a combustible free zone that may not be fire stopped as required and 4) several typographical errors in the Appendix R documentation. These items are being addressed by our current compensatory actions and by the Appendix R Project Team.

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CAUSE OF EVENT

The root and contributing causes of these events have been determined by an independent multi-discipline team. The Root Cause Team identified the following:

Root Causes:

1. Weaknesses in the safe shutdown capability analysis.
2. Content and control of Appendix R documentation was weak in describing overall compliance.
3. Lack of overall understanding of Appendix R requirements.

Contributing Causes:

1. Lack of ownership / oversight / coordination
2. Appendix R not considered a living document
3. Depth of understanding.

The corrective actions identified in this report shall address the root and contributing causes.

ANALYSIS OF EVENT

Plant fire protection systems and barriers are classified Non-Nuclear Safety. However, they protect and separate various areas containing safety related, safe shutdown equipment to ensure the reactor can be brought to and maintained in "cold shutdown" in the event of any analyzed in-plant fire. Although the events detailed in this report are significant in that they involved non-compliance with a regulatory licensing requirement, no equipment or systems have been rendered inoperable as a result of the identified conditions. The conditions involve deficiencies in some of the features credited for providing compliance with the specific requirements of 10CFR50 Appendix "R" for which compensatory measures have been taken. These measures supplement the normal fire detection and protection features, and include: continuous and roving firewatches, the limiting of combustible materials in the affected areas, and the application of additional controls to restrict hot work in these areas. In each case, as Vermont Yankee identified deficiencies in the implementation of Appendix "R" requirements, the NRC was promptly informed of the issues and corresponding compensatory measures that were put in place until the deficiencies are fully resolved.

Since the conditions represented non-compliance with a regulatory requirement, it was recognized that NRC involvement was required. Vermont Yankee has established periodic dialogue with the NRC and will continue to provide frequent updates of the status of Appendix "R" issues. On October 16, 1995 Vermont Yankee staff met with NRC Region I staff at the Vermont Yankee site to review the Vermont Yankee status. During the weeks of October 20 and November 6, 1995 an NRC Region I inspection / assessment of Appendix R was performed at Vermont Yankee. The interaction with the staff provided better understanding of the Appendix R issues at Vermont Yankee, Vermont Yankee's plan for corrective action and NRC expectations for full compliance.

The 08/23/95 issue associated with the time available to get Alternate Shutdown Systems in-service is significant in that margin is reduced, and for the limiting design basis Appendix "R" fire scenario, the RCIC System may not be initiated in the time necessary to meet Appendix "R" requirements and some minor core heatup may occur. However, the probability of experiencing this limiting design basis scenario (i.e. extreme fire damage affecting all core injection systems, spurious valve mispositioning, and multiple blown fuses) is considered low. Furthermore, even assuming conservative design basis fire events, no core damage is predicted.

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With regard to recent industry concerns associated with TSI Thermo-Lag material, Vermont Yankee no longer relies on this type of fire wrap for meeting Appendix "R" safe shutdown requirements. Therefore, this industry issue does not impact the recently identified Appendix "R" issues at the plant.

CORRECTIVE ACTIONS

Immediate:

1. Compensatory measures consisting of firewatches, equipment monitoring, administrative controls and enhanced awareness of potential Appendix "R" vulnerabilities have been implemented.
(Status: See Note 1)
2. An Operations Standing Order has been issued to provide details of the conditions and specify operator actions for response to particular fire scenarios in the areas determined to be vulnerable.
(Status: See Note 1)

[Note 1: Immediate Corrective Actions 1 and 2 were instituted to ensure the intent of 10CFR50 Appendix "R" is satisfied. These measures have been and will continue to be adjusted, as necessary, upon identification of any additional concerns.

3. Vermont Yankee has established periodic dialogue with the NRC and will continue to provide frequent updates of the status of the subject 10CFR50 Appendix "R" issues.

Short Term:

1. A Self Assessment team was assembled to ensure any additional vulnerabilities were promptly identified. The team reviewed the Vermont Yankee Safe Shutdown Capability Analysis to verify key assumptions and conclusions for each fire zone are acceptable. This included design, procedural, licensing, staffing, and training aspects. The Team was comprised of five senior personnel, with diverse backgrounds, from Vermont Yankee, Yankee Atomic and external organizations, none of whom had significant involvement in the original program development. The Self Assessment began on 08/07/95, and was completed on 09/08/95. (Status: Complete)
2. An Evaluation team was established for review of concerns, operability considerations, compensatory measures, procedures, and analytical solutions. The team was formed on 07/28/95 and completed its efforts on September 29, 1995. (Status: Complete)
3. A Design Change team was established on 07/28/95 to evaluate conceptual designs that may be required for resolution of some of the identified Appendix "R" deficiencies.
(Status: On hold; see Long Term Corrective Action #4.)
4. An independent, multi-discipline Root Cause Analysis team was formed to determine root and contributing causes of these events. This team was fully assembled on 08/28/95. Their final report was issued on September 22, 1995
(Status Complete)

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Long Term:

1. The Appendix R Project Team has assessed the need for more explicit operator procedures for certain Appendix R fire scenarios and has determined that more explicit guidance should be developed where necessary. Additional guidance will be developed by the Appendix R Project Team. (Expected Completion Date: Fall 1996 Refueling Outage)
2. Full compliance with Appendix "R" requirements, without the need for crediting the compensatory measures detailed in this report, will be achieved by no later than the end of the 1996 Refueling Outage. (Expected Completion Date: Fall 1996 Refueling Outage)
3. On 09/10/95, the formation of an Appendix "R" Project Team consisting of senior personnel from the Vermont Yankee and Yankee Atomic organizations was announced. The primary mission of this team will be to: 1) address all open issues identified by the analysis teams, emerging industry issues or NRC interaction; 2) rewrite the Safe Shutdown Capability Analysis; 3) identify any necessary design changes, and 4) ensure the Vermont Yankee Appendix "R" Program becomes a well documented and comprehensive program. (Expected Completion Date: Fall 1996 Refueling Outage)
4. As a result of the need to rewrite the Safe Shutdown Capability Analysis to address the issues described in this LER, the previous commitment due dates, described in LER 94-11 and LER 95-03, to revise the SSCA and perform training have been revised to be consistent with Item #3 above. This has been discussed with the NRC resident inspector. (Revised Completion Date for commitments described in LER 94-11 and 95-03: Fall 1996 Refueling Outage)
5. On 11/6/95, a Lead Project Engineer for the Fire Protection and Appendix R Improvement Programs was assigned by the Vice President of Engineering to directly manage these programs, addressing ownership, coordination and oversight.

ADDITIONAL INFORMATION

Similar events related to the implementation of 10CFR50, Appendix "R" were reported to the Commission under the following Licensee Event Reports:

- | | |
|-----------|---|
| LER 93-01 | "Degraded vital fire barriers due to inadequate documentation of assumptions and inadequate procedures" |
| LER 94-11 | "Failure to properly identify all areas requiring emergency lighting units in accordance with 10CFR50 Appendix R, Section III.J" |
| LER 95-03 | "Failure to provide required emergency lighting in an area in accordance with 10CFR50 Appendix R, Section III.J due to a failure in the management system." |
| LER 95-04 | "Incomplete repair of inoperable vital fire barrier penetration fire seal." |

It is recognized that the events of this report are of concern when considered in conjunction with previous weaknesses in the fire protection and Appendix "R" areas. As a result of the recently combined Triennial/Annual Fire Protection Program Audit, a Fire Protection Program Improvement Team has been formed to assess the overall program and review the Fire Protection program base documents against the current regulatory documents. In addition, considerable improvement efforts

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were already underway in the SSCA as a result of the corrective actions from previously identified fire barrier and lighting issues. The findings of the task teams will be considered together with the other ongoing efforts, in determining the actions required to ensure continual improvement in the fire protection program.