APR 1 4 1992

Docket No. 50-271

Vermont Yankee Nuclear Power Corporation ATTN: Mr. Warren P. Murphy Senior Vice President, Operations RD 5, Box 169 Ferry Road Brattleboro, Vermont 05301

Dear Mr. Murphy:

SUBJECT: EMERGENCY OPERATING PROCEDURE INSPECTION (INSPECTION REPORT NO. 50-271/92-80)

This letter transmits the results of the special announced safety inspection conducted by an NRC Emergency Operating Procedure Inspection Team from February 24 to February 28, 1992, at the Vermont Yankee Nuclear Power Station, in Vermon, Vermont. The team's findings were discussed with you and other members of your staff at the conclusion of the inspection.

The enclosed report identifies areas examined during the inspection. The areas inspected included a comparison of the Vermont Yankee Emergency Operating Procedures (EOPs) with the BWR Owners Group (BWROG) Emergency Procedure Guidelines (EPGs) and the Plant Specific Technical Guidelines (PSTGs), a review of the VY EOPs and EOP support procedures, evaluations of the VY EOPs and support procedures by plant walkdowns and exercises on the plant specific simulator, a human factor analysis of the VY EOPs, and a review of the programmatic controls for maintaining the EOPs.

The inspection team informed me that the VY EOP program is much improved and is trending in a positive direction. In general, the VY PSTGs and EOPs were found to be technically adequate and previously identified deficiencies have been corrected. However, discrepancies were identified in the PSTGs and EOPs that detract from the technical adequacy of the VY accident mitigation strategies. The training provided to the operators was considered a compensatory strength of the program. The programmatic controls in place for the development and maintenance of the EOPs, though informal, appear to be effective in maintaining flowchart procedures of high quality. Weaknesses in the program have resulted in ECP appendices and support procedures that are not of the same high quality. Additionally, your programmatic controls are not effective for ensuring that tools and materials will be available to support implementation of the EOP support procedures.

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During the inspection, the team discerned a view among your staff that, because the EOPs address situations that go beyond the design basis of the plant and have a low probability of occurrence, they do not need to be controlled at the same level as other procedures. This view differed from the position stated by Vermont Yankee management.

Individually, the weaknesses and deficiencies identified during this inspection presented no immediate safety concern. However, the identified weaknesses are important and of concern in that they could lead to inadequate operator actions in response to more complex or severe accident events involving multiple equipment failures. Therefore, you are requested to provide a written response to the identified weaknesses in: (1) the technical adequacy of the VY PSTGs, VY EOPs, and Reactor Pressure Vessel Control guideline (sections 3.1, 3.2, 3.3, and 4.2 of the enclosed inspection report); and (2) your EOP programmatic controls (sections 6.1 and 6.2 of the enclosed inspection report) within sixty days of receipt of this letter. The root cause for these weaknesses is not clear. Please provide your perspective of the root cause of these items in your response. Further, your staff verbally agreed to correct deficiencies concerning OE 3100, "Scram Procedure," and the Torus Temperature Control guideline and to obtain a sufficient quantity of borax required by OE 3107, Appendix J. Please notify us immediately if our stated understanding is flawed.

The response requested by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511. In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed report will be placed in the NRC Public Document Room.

Should you have any questions, please contact Mr. Lee H. Bettenhausen, Chief, Operations Branch at (215) 337-5291.

Sincerely,

Marvin W. Hodges, Director Division of Reactor Safety

Enclosure: Inspection Report No. 50-271/92-80

## Vermont Yankee Nuclear Power Corporation 3

## cc w/encl:

- J. Weigand, President and Chief Executive Officer
- J. Pelletier, Vice President, Engineering
- D. Reid, Plant Manager
- J. DeVincentis, Vice President, Yankee Atomic Electric Company
- L. Tremblay, Senior Licensing Engineer, kee Atomic Electric Company
- J. Gilroy, Director, Vermont Public Interest kesearch Group, Inc.
- G. Iverson, New Hampshire Office of Emergency Management
- Claef, Safety Unit, Office of the Attorney General, Commonwealth of Massachusetts
- R. McCandless, Vermont Division of Occupational and Radiological Health
- R. Gad, Esquire
- C. Bisbee, Esquire
- Chairman, Board of Selectmen, Town of Vernon
- R. Sedano, Vermont Department of Public Service
- T. Rapone, Massachusetts Executive Office of Public Safety
- Public Document Room (PDR)
- Local Public Document Room (LPDR)
- Nuclear Safety Information Center (NSIC)
- K. Abraham, PAO (2)
- NRC Resident Inspector
- State of New Hampshire, SLO Designee
- State of Vermont, SLO Designee
- Commonwealth of Massachusetts, SLO Designee

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bec w/encl:

Region I Docket Room (with concurrences and IFS Forms)

Management Assistant, DRMA (w/o encl)

M. Hodges, DRS

C. Hehl, DRP

J. Linville, DRP

J. Rogge, DRP

H. Eichenholz, SRI - Vermont Yankee (w/concurrences and IFS Forms)

N. Perry, SRI - Yankee Rowe

R. Lobel, OEDO

P. Sears, NRR

W. Butler, NRR

P. Bonnett, DRS

T. Walker, DRS

J. Caruso, DRS

T. Mazour, SAIC

M. Sjoberg, DRSS

OL Facility File

DRS Files (3)

bcc w/Letter and Executive Summary Only (and rinclosure 1 - to be used with an NOV)

T. Martin, RA

W. Kane, DRA

C. Hehl, DRP

J. Wiggins, DRP

M. Knapp, DRSS

W. Hodges, DRS

W. Lanning, DRS

J. Durr, DRS

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