VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-105

REPLY TO:

ENGINEERING OFFICE

FRAMINGHAM, MASSACHUSETTS 01701 TELEPHONE 617-872-8100

August 22, 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 DPR-28 (Docket No. 50-271)
- b) Letter, USNRC to VYNPC, FVY 83-30, dated 4/19/83
- c) Letter, USNRC to All Operating Licensees, Generic Letter 82-33, dated 12/17/82
- d) Letter, USNRC to VYNPC, dated 6/12/84
- e) NUREG/CR-3632, "Methods for Implementing Revisions to Emergency Operating Procedures"
- f) Letter, VYNPC to USNRC, FVY 84-61, dated 6/12/84

Dear Sir:

Subject:

NUREG 0737, Supplement I - Upgrade Emergency Operating Procedures (EOP's)

By letter dated April 19, 1983 [Reference b)], we provided you with our integrated program plan and schedule for addressing NUREG 0737, Supplement I, Requirements for Emergency Response Capability. The purpose of this letter is to request an extension to our schedule [as confirmed by Reference d)] for implementation of our upgraded Emergency Operating Procedures. The delay is principally due to the need to complete the operators training on the procedures, which is to include simulator instruction in accordance with the guidelines of Reference e). This training cannot be factored into the operators present schedule until the first part of 1985 due to unavailability of simulator time.

The other major tasks in progress that preclude earlier EOP implementation include:

- 1) Control Room Design Review Program/Task Analysis September
- 2) INPO Accreditation/Training Program October
- 3) Operator Regualification Program/1984 through December

9408310073 840822 PDR ADDCK 05000271 F PDR 0.S. Nuclear Regulatory Commission August 22, 1984 Page 2

VERMONT YANKEE NUCLEAR POWER CORPORATION

Based on the above, the revised schedule is to implement the upgraded EOP's by June 1, 1985. This extension would only effect the schedule date for Item 4b of the table attached to Reference d). The proposed schedule extension for implementation will permit more efficient and effective use of our operators' time by avoiding overlap of these activities. This extension will also require rescheduling the simulator instruction for the 1985 Operator Requalification Program until the latter part of that year. This in turn will require an extension of approximately two weeks (mid-January 1986) to complete the simulator taining for the 1985 Requalification Program.

Regarding Reference d), it should be noted that, separate from this request, we are planning to submit the report on compliance to Regulatory Guide 1.97 (Item 3 of the table) in October 1984 as indicated in Reference f) and as discussed with your staff.

We would like to emphasize that this delay in implementation of the EOP's in no way affects the overall integrated program as previously outlined. The EOP's have been drafted and are currently in final review.

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

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

auce Warren P./Murphy

Vice President and Manager of Operations

WPM/dm