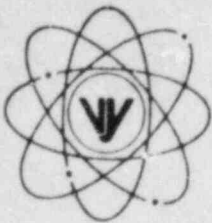


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-116

REPLY TO:
ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 817-872-8100

September 25, 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 All Operating Reactors, Generic Letter 83-28, dated 7/8/83
 - c) Letter, VYNPC to USNRC, FVY 83-117, dated 11/7/83
 - d) "BWR" Scram System Reliability Analysis", W.P. Sullivan, et al, dated 9/30/76 (transmitted in letter from GE to NRC, "General Electric Company ATWS Reliability Report," dated 4/30/76)
 - e) Letter, VYNPC to USNRC, Proposed Change No. 79 to Facility Operating License DPR-28, dated 3/17/80
 - f) Letter, USNRC to VYNPC, Amendment No. 58 to Facility Operating License DPR-28, dated 11/3/80
 - g) Letter, VYNPC to USNRC, dated 3/23/84

Dear Sir:

Subject: Generic Letter 83-28, Generic Implications of Salem ATWS Events

By Reference g), we stated that we would provide you with information regarding our overall program for Post Trip Review. The purpose of this letter is to submit that information.

Vermont Yankee Procedure AP 0154 has been developed and implemented (4/30/84) to ensure that all unscheduled reactor trips are analyzed with the resulting evaluation utilized for the restart decision.

A description of the basis for this procedure is presented below in terms of the seven positions stated in Reference b) [Generic Letter 83-28, Action 1.1 of the Enclosure].

1. AP 0154, Post Trip Review, contains the criteria to determine if the reactor can be restarted. The procedure forms a structured and systematic method by which station personnel can verify that:

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- a. the most probable cause of the trip has been determined and corrected;
 - b. all safety-related and other important equipment involved in the trip operated as anticipated or expected; and
 - c. no detrimental effects on plant equipment occurred as a result of the trip/transient.
2. The responsibilities and authorities of personnel within the scope of the Post Trip Review procedure are as follows:
- a. The Shift Engineer will collect the data.
 - b. The Shift Supervisor (or SRO designate) and the Shift Engineer will analyze and evaluate the event. The Post Trip Report is to be completed in conjunction with this review.
 - c. The Shift Supervisor is responsible for the completeness of the investigation.
 - d. The completed report is to be utilized by plant management in the decision to restart. If further review is necessary, a Post Trip Committee will be assembled by the Operations Superintendent.
 - e. PORC will review all trip reports at a subsequent meeting.
3. Specific training on the Post Trip Review process has already been conducted with those individuals involved.

The qualifications of the SS, SCRO, SE and PORC are not changed from existing technical specification and procedural requirements.

4. AP 0154, Post Trip Review, specifies the sources of information necessary to conduct the review. Hard copy traces of Control Room instruments and computer edits will be attached to the report.
5. A data base will evolve from the implementation of this review program which will allow an event to be compared with previous plant behavior. There is also a large amount of operational experience available at the plant which will aid in an objective determination of the plant's response. In addition, a significant or unusual transient can be compared with the response predicted by the Accident Analysis.

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A variety of procedures are currently in place which insure that all LCO's in the technical specifications are met prior to changing modes of operation. This will insure that all required equipment and systems are functional prior to startup.

6. The need for independent assessment of an event is required when the acceptance criteria of AP 0154, Post Trip Review, cannot be met. The Post Trip Committee, as delineated in the procedure, would be responsible for further assessment and recommended action prior to startup. Once a final resolution has been reached, the Plant Manager will specify any conditions, based upon the reviews, in his authorization to restart, pursuant to the requirements of technical specifications.

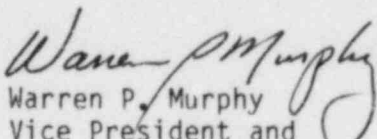
The preservation of physical evidence for use in an independent analysis of the event is assured in that the Post Trip Report, prepared in accordance with AP 0154, will contain copies of all data utilized in the review. All other strip charts, computer edits, station logs are maintained by the Document Control Center.

7. The Post Trip Review Procedure identifies the systematic process for evaluation and is enclosed.

We trust that this information satisfactorily addresses your concerns; however, should you have any questions, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm