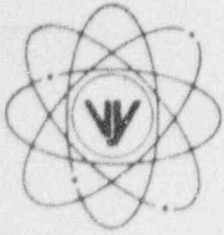


VERMONT YANKEE NUCLEAR POWER CORPORATION



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REPLY TO:
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April 18, 1996
BVY 96-51

United States Nuclear Regulatory Commission
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Washington, DC 20555

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to All Licensees, Generic Letter 96-01, dated January 10, 1996
(c) Letter, B.A. Boger (USNRC) to A. Marion (NEI), dated February 14, 1996
(d) Memorandum, VYI 211/87, "Summary of Vermont Yankee Technical Specification Logic System Functional Testing," dated September 21, 1987

Subject: Response to NRC Generic Letter 96-01, "Testing of Safety Related Logic Circuits"

This letter transmits the 60-day required response of Generic Letter 96-01 [Reference (b)] in accordance with the revised response date communicated by the NRC to NEI in Reference (c). Vermont Yankee plans to implement the requested actions of Reference (b) in accordance with the schedule provided.

In 1987, in response to Duane Arnold logic testing deficiencies identified by the NRC, Vermont Yankee evaluated its Technical Specification requirements for logic system functional testing (LSFT) [Reference (d)]. Specifically, Vermont Yankee performed a detailed review of station drawings and surveillance procedures to verify acceptable testing of systems identified in the Technical Specifications which required LSFT. The systems evaluated included the reactor protection system (RPS) and engineered safety features (ESF) systems. The design intent of each Technical Specification system was verified to the contact level, from sensor to end device (where possible), taking credit for overlapping surveillance test requirements. Following the evaluation, logic system test procedures were enhanced, where necessary, to ensure acceptable LSFT.

The methodology used to perform this evaluation was formally documented and is the basis for evaluating logic test requirements for new and modified logic circuits. Based upon this evaluation, Vermont Yankee considers the existing surveillance procedures sufficient to verify that the Technical Specification requirements for the systems evaluated are being satisfied. However, Vermont Yankee will review the 1987 evaluation and ensure that the RPS and ESF systems have been evaluated to the extent requested in Reference (b).

Proper operation of the emergency diesel generator (EDG) load shedding and sequencing circuits (Technical Specification 4.10.A.1.b) is verified each operating cycle under existing plant procedures. Although this test verifies proper EDG load shedding and sequencing, plant procedures have not been evaluated as requested in Reference (b). Therefore, Vermont Yankee will perform the requested actions of Reference (b) for the EDG load shedding and sequencing systems.

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