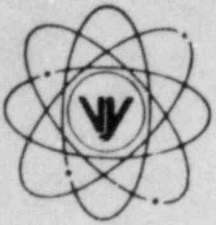


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-135

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

November 9, 1984

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

Attention: Office of Nuclear Reactor Regulation
Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, VYNPC to USNRC, FVY 84-75, dated 6/29/84
c) Letter, USNRC to VYNPC, NVE 84-202, dated 9/4/84
d) Letter, VYNPC to USNRC, FVY 84-64, dated 6/19/84
e) Supplement 1 to NUREG 0737, USNRC Generic
Letter 82-33, NVE 82-213, dated 2/17/82

Dear Sir:

Subject: Additional Information Concerning Procedures Generation Package

We are providing Attachment A in response to your request for additional information made by Reference c). In response to Item 1, we have provided a more detailed description of our process for translating the generic technical guidelines into plant specifics consistent with paragraph 7.2.b.i of Reference e). As described in our response, we have and will continue to evaluate any deviations and document their resolution. This documentation will be available for review at our Vernon facility.

This information will be incorporated in a revision to the Procedure Generation Package which is currently planned to be issued in January 1985.

Should you have any questions or desire additional information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Warren P. Murphy
Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm

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I. Process for Development of Plant Specific Technical Guidelines

1.0 Abstract

The BWR Owners Group Emergency Procedure Guidelines (EPGs), Revision 3A, with background information was utilized together with the plant-specific technical information as described in paragraph 2.2.1.1 of the Procedures Generation Package (PGP) to prepare Vermont Yankee's Operational Emergency Procedures (OEPs). Since the final form of the OEPs establishes the bases for the final content of Vermont Yankee's Plant-Specific Technical Guidelines (PSTGs) the development of the OEPs and the PSTGs is proceeding concurrently. In its final form the Plant-Specific Technical Guidelines will be comprised of the BWR Owners Group Emergency Procedure Guidelines and appendices, Revision 3, together with documentation of all deviations from and additions to the EPGs.

2.0 Organization

2.1 Operational Emergency Procedures Coordinator (OEPC)

The OEPC is a member of the plant operations staff who has overall responsibility for the development of the OEPs and supporting documentation. The OEPC insures that all deviations and additions to the EPGs are identified and documented and that sufficient technical justification for the deviations is provided. The OEPC also insures that the necessary levels of review and approval is performed for the OEPs and PSTGs.

2.2 Operational Emergency Procedures Writing Team (OEPWT)

The OEPWT is selected by the OEPC and is responsible for writing the OEPs consistent with the provision of section 2.2.1 of the Procedures Generations Package. Members of the writing team were selected based on their familiarity with the EPGs, understanding of BWR operation and experience in procedure preparation.

2.3 Operations Review Team (ORT)

The ORT is responsible for review of the OEPs to insure that instructions are consistent with existing plant operating practices. Additionally the ORT insures specific operating instructions are included where appropriate in the OEPs to facilitate use by the plant operators. The ORT consists of at least two SRG licensed individuals from the plant operating staff.

2.4 Independent Review Team (IRT)

An IRT has been contracted to insure that any deviation generated in the conversion of the BWROG Emergency Procedure Guidelines to Plant-Specific Technical Guidelines are identified and all calculations performed in the generation of the Plant-Specific Technical Guidelines are verified. Additionally the IRT is responsible to insure the OEPs are consistent with the provisions of the plant specific writers guide and the OEPs accurately reflect the information in the source documents. Members of the IRT were selected on the basis of their experience and expertise in the specified areas of review.

3.0 Process for Conversion from Generic to Plant-Specific Technical Guidelines

3.1 Initial Draft of the OEPs

- 3.1.1 The OEPWT will prepare the OEPs in accordance with para. 2.2.1.2 of the PGP. These will be submitted for review to the Operation Review Team and the OEP Coordinator. The OEPWT will then re-write the OEPs utilizing the results of this review and prepare a report consisting of a cross-reference between the BWROG EPG steps and the OEP steps, as well as a list of deviations from the BWROG EPG.
- 3.1.2 The OEPs and the report prepared by the OEPWT will be submitted for review by both the Independent Review Team and the OEPC. The IRT will prepare a report of their findings and submit it to the OEPC and will be utilized in the preparation of the Plant-Specific Technical Guidelines and subsequent revisions of the OEPs.
- 3.1.3 The OEPC will review the reports from both the OEPWT and the IRT. He will make recommendations for resolution of their findings and comments. These recommendations will be documented in a report which, together with those reports submitted by the OEPWT and IRT, will be forwarded to the Operations Engineer, a permanent member of the plant operations staff, for review and approval.
- 3.1.4 The Operations Engineer will initiate a tracking system indicating the status of those deviations for which it is determined that (1) inadequate justification has been provided or (2) would require a safety evaluation. It is his responsibility to ensure that the status of all deviations are resolved prior to implementation of the OEPs.
- 3.1.5 The OEPC will revise the OEPs with the approval of the Operations Engineer and Operations Supervisor. The OEPs will then be submitted to PORC for their review and recommendation for approval for Operator Training/OEP validation.
- 3.1.6 After obtaining PORC recommendation for approval, the OEPs will be submitted to the Plant Manager, and subsequently to the Manager of Operations for their review and approval for use in operator training/OEP validation.

3.2 Revisions to Initial Drafts of OEPs

- 3.2.1 Any deviations from or additions to the BWROG EPGs which are required to resolve recommendations resulting from the verification/validation of the OEPs will be documented by the OEPC. These deviations and additions, together with the justification for deviation, will be submitted to the Operations Engineer for his review and approval.

- 3.2.2 Revisions of the OEPs will be submitted to the ORT and the Operations Supervisor for review and recommendation.
- 3.2.3 Prior to implementation of the Operational Emergency Procedures, the revised OEPs and all additions and deviations to the BWRUC EPGs together with their justification, will be submitted to PORC for their review and recommendation for approval, and forwarded to the Plant Manager.
- 3.2.4 The Plant Manager will review the completed OEPs and related information as described above. With his approval these will be forwarded to MOO for final review and approval.

II. Process for Identifying Information and Control Requirements

1.0 Identification of Control Parameters

Identification, review, approval and documentation of the plant parameters to be utilized by the operators during emergency conditions is implicit to the procedure development process. The BWRUC Technical Guideline identifies those plant parameters which form the basis for the information and control requirements for the operators.

2.0 Availability and Adequacy of Instrumentation and Controls

The OEPs are utilized in the Detailed Control Room Design Review Program Plan to determine instrumentation and control availability, suitability, and location. The methodology employed is described in the Detailed Control Room Design Review Program Plan for the Vermont Yankee Nuclear Power Plant. A copy of the Plan has been submitted to the NRC as Attachment I a letter sent to the NRC from Vermont Yankee NPC, FVY 84-64, dated June 19, 1984.