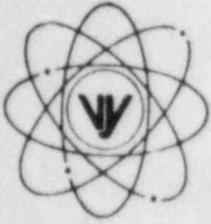


# VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 163, Ferry Road, Brattleboro, VT 05301

FVY 85-1

REPLY TO:

ENGINEERING OFFICE

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

January 9, 1985

U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, USNRC to VYNPC, I&E Inspection No.  
50-271/84-11, dated 9/17/84  
c) Letter, VYNPC to USNRC, FVY 84-114, dated 9/24/84  
d) Letter, USNRC to VYNPC, NVE 84-254, dated 12/11/84

Dear Sir:

Subject: I&E Inspection No. 50-271/84-11

By letter dated December 11, 1984 [Reference c)], you informed us of your determination not to withdraw an alleged violation pertaining to the installation of our in-containment high range radiation monitors. These monitors were installed to satisfy NUREG 0578 and the intent of NUREG 0737 Item II.F.1.3 and were reviewed for adequacy by I&E, as detailed in Inspection Report No. 50-271/84-11 [Reference b)]. The Inspection Report indicates that our "failure to position the high range containment monitors consistent with the guidance of NUREG 0737 constitutes nonconformance with the specifications of NUREG 0737 relative to the Confirmatory Action dated March 14, 1984."

We still maintain that the alleged violation should be formally withdrawn. As stated in our September 24, 1984 letter [Reference c)] in response to Inspection Report No. 50-271/84-11, the containment high range monitors were located to provide a reasonable assessment of area radiation inside containment in the event of a significant violation of the reactor coolant system pressure boundary, consistent with clarification statement (3) of NUREG 0737 Item II.F.1.3. The separation between the monitors is to the maximum extent practicable so as to provide independent measurements and "view" a large fraction of the containment volume. As stated in our September 24, 1984 submittal, the small volume of the drywell and the congestion caused by piping limits the number of acceptable locations to satisfy the primary intent of the NUREG item. Subsequent NRR staff interpretations of what constitutes "widely separated" notwithstanding, we believe the existing locations of the monitors satisfy the criteria of Item II.F.1.3.

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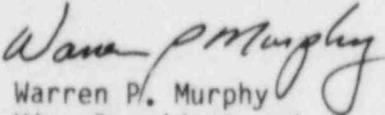
VERMONT YANKEE NUCLEAR POWER CORPORATION

As stated in your December 11, 1984 letter, the basis for your determination not to withdraw the proposed violation results from your review of our September 24, 1984 submittal with the Radiological Assessment Branch of NRR. We have subsequently contacted our NRR Project Manager and informed him that we will be submitting information regarding the basis for the location and acceptability of the high range monitors. We expect this effort will result in NRR issuing a Safety Evaluation Report (SER) for this NUREG item. The SER should then become the basis for determining our compliance with the guidance criteria of NUREG 0737.

In summary, the determination of the placement of the in-containment high range monitors was based on satisfying the primary intent of Item II.F.1.3. The physical separation was dictated by the constraints inherent in our drywell, and therefore satisfies the criteria for widely separated given these constraints. Thus, we believe we have fulfilled the commitment referenced in the March 14, 1983 Confirmatory Order, and request that you formally withdraw the proposed violation. The need for subsequent action to completely satisfy NRR's interpretation of widely separated will be based on their review of our technical basis.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and  
Manager of Operations

WPM/dm