## VERMONT YANKEE NUCLEAR POWER CORPORATION



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REPLY TO: ENGINEERING OFFICE

FVY 85-58

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June 21, 1985

United States Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Office of Nucle Reactor Regulation Mr. Domenic B. V. sallo, Chief Operating Reactor Branch No. 2 Division of Licen ing

References:

- (a) License No. DPR-28 (Docket No. 50-271)
- (b) Letter, USNRC to All Operating Licensees, NVY 82-213, dated December 17, 1982, Supplement 1 to NUREG-0737 -Requirements for Emergency Response Capability (Generic Letter 82-23)
- (c) Letter, USNRC to VYNPC, NVY 84-128, dated June 12, 1984, "Issuance of Order Confirming Licensee Commitments on Emergency Response Capability"
- (d) Letter, VYNPC to USNRC, FVY 84-61, June 12, 1984, "NUREG-0737, Supplement 1 - Regulatory Guide 1.97, Application to Emergency Response Facilities"
- (e) Letter, USNRC to VYNPC, NVY 84-219, dated September 28, 1984, Supplement 1 to NUREG-0737, Request for Modification of Commission Order, dated June 12, 1984
- (f) Letter, VYNPC to USNRC, FVY 84-127, dated October 30, 1984, NUREG-0737, Supplement 1 - Regulatory Guide 1.97
- (g) Letter, VYNPC to USNRC, FVY 85-11, dated January 31, 1985, Certification of Compliance to 10CFR50.49, Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants (Generic Letter 84-24)

Subject:

NUREG-0737, Supplement 1 - Schedule for Regulatory Guide 1.97 Commitments

Dear Sir:

By letter dated October 30, 1984 [Reference (f)], Vermont Yankee submitted the results of our evaluation of Regulatory Guide 1.97, Revision 3, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environmental Conditions During and Following an Accident," in accordance with References (b), (c) and (e). In that letter we stated that:

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"Those components identified in Attachment A, Section 3, requiring modification to achieve compliance with 10CFR50.49, will be upgraded prior to restart from the 1985 refueling outage unless otherwise impacted by problems with timely receipt and installation. For that equipment which does not require environmental qualification compliance, a schedule will be established to insure installation prior to restart from the 1987 refueling outage."

In response to your recent request, we herein identify the instrumentation listed in Attachment A, Section 3, of our October 30, 1984 [Reference (f)] submittal which is scheduled to be upgraded prior to restart from the 1985 outage, and the instrumentation which is scheduled to be upgraded prior to restart from the 1987 outage. The instrumentation identified on Pages 13 and 14 of Attachment A to Reference (f) represents the Regulatory Guide 1.97 instrumentation requiring installation or modification to achieve compliance with 10CFR50.49 which is scheduled to be completed prior to restart from the 1985 outage, unless otherwise impacted by problems associated with timely receipt and installation. The instrumentation identified on Page 12 of Attachment A to Reference (f) represents the instrumentation requiring installation or modification which is scheduled to be completed prior to restart from the 1987 refueling outage.

As stated in our letter of January 31, 1985 [Reference (g)], we consider the schedule for completing Regulatory Guide 1.97, Environmental Qualification-related component upgrades to be dependent upon NRC's approval of our October 30, 1984 [Reference (f)] submittal. We presently understand that NRC's review of that submittal will not be completed until July or August 1985. Vermont Yankee, however, is still planning to complete the Environmental Qualification-related instrumentation upgrades identified in our October 30, 1984 submittal prior to restart from the 1985 outage. This effort represents completion of better than 50 percent of the instrumentation installations or modifications committed to in our Regulatory Guide 1.97 submittal.

We trust that you will find this information satisfactory; however, should you have any questions or require additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

R.W. Cepstick

R. W. Capstick Licensing Engineer

WPM/RWC/mmt