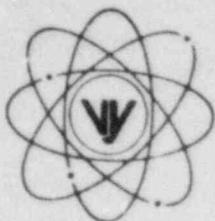


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 86-11

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617 172-8100

February 12, 1986

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

Attn: Dr. Thomas E. Murley
Regional Administrator

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, NVY 85-274, dated 12/31/85
c) Letter, VYNPC to USNRC, FVY 85-82, dated 9/12/85
d) Letter, VYNPC to USNRC, FVY 85-86, dated 9/12/85

Dear Sir:

Subject: Systematic Assessment of Licensee Performance
(SALP Report No. 50-271/85-99) Licensee Comments

The purpose of this letter is to provide you with comments regarding your Systematic Assessment of Licensee Performance (SALP) Report No. 50-271/85-99. We appreciated the opportunity to discuss this report with you on January 10, 1986 during the public meeting held at Vernon, Vermont. In general, we believe that the report is a fair appraisal of our activities during the November 1, 1984 through October 18, 1985 time period; however, as discussed during our meeting, we believe there are certain areas within the report which warrant clarification.

Accordingly, we submit the following comments for your consideration:

(1) Section IV.A.1, Operations

The SALP Report states that based upon a sample of eight (8) LER's evaluated by AEOD, our LER's were of "barely acceptable quality."

We have reviewed the AEOD comments regarding our Licensee Event Report (LER's) with our Resident Inspector. While we cannot disagree that there were some shortcomings in some of our LER's, we certainly do not agree that they were "of barely acceptable quality." We feel that, in some cases, the commenter's observations were subjective and not necessary based on the requirements of 10CFR50.73. It is also noted that several of the comments are purely editorial in nature. It is not clear from the report how heavily these were considered in the final determination of "adequacy".

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Pending clarification by the Resident Inspector of some of the comments and our questions, we will take whatever additional steps are necessary to address all valid deficiencies.

(2) Section IV.B.1.2, Radioactive Waste Management and Effluent Controls

The SALP Report states that "Planned releases of liquid radwaste were minimized...." As discussed at our meeting, Vermont Yankee has had no liquid releases during the report period. We would appreciate modification of the SALP Report to reflect this fact, so as to not have the potential for misunderstanding on the record.

(3) Section IV.E.1, Emergency Preparedness

The SALP Report states that "Effective in September 1985, the Vermont Yankee Emergency Management Organization was established and identified in the Emergency Plan to more clearly define overall direction and control during emergencies. Two points require clarification, as discussed during our meeting.

First, the implication that the Vermont Yankee Emergency Management Organization was established in September 1985 leaves the impression that no such organization existed prior to that time, which is obviously incorrect. We would appreciate your rewording to clarify this point.

Secondly, with respect to more clearly defining overall direction and control during emergencies effective September 1985, as noted in our Reference d) letter, Vermont Yankee committed to evaluate the authority and functional responsibility of key managers in the Emergency Plan prior to the next annual Emergency Plan Drill. Reference c) noted that Vermont Yankee's new EOF was operational, and that a revision to the Emergency Plan had been issued to reflect the new facility. Your correction of this point, in the interest of clarity, is appreciated.

In general, Vermont Yankee was very disappointed with your rating of our performance in this area. As stated during our meeting, achieving excellence in Emergency Planning is one of Vermont Yankee's highest priorities, and we believe our efforts over the evaluation period were indicative of our commitment. Overall, Vermont Yankee received no items of noncompliance in Emergency Preparedness, nor were there any reportable events in that area. During this same period, we implemented our new EOF, considerably improving upon the old facility. We believe, therefore, that your assessment was based primarily upon our annual drill.

Our experience, based upon the actual Emergency Plan activation for the withdrawn TIP probe in 1984, is that Vermont Yankee's performance in actual events is substantially better than in drills. We attribute this to a number of factors, as follows:

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- o EOF Facilities - The drill was performed, with the NRC, States and Vermont Yankee knowing the marginal acceptability of the EOF facilities to accommodate the large number of responders. This problem was recognized within Vermont Yankee, and factored into the new EOF design, which is now operational.
- o Drill as a training tool - Vermont Yankee uses annual drills to augment formal training, resulting in "trainees" in many positions. This results in, at times, less than smooth drills, but does ensure experienced individuals in key roles, and through having people "play" more than their Plan-assigned position, promotes familiarity with the overall emergency response activities.
- o Scenario defects - Based on the need to exercise all three states within the Emergency Planning Zone, realistic scenarios are not possible. This results in perceived difficulties with Vermont Yankee's off-site consequence analysis which are scenario induced, rather than real. Coupled with minor scenario problems (i.e., instructions, timing, prompting, time-induced limitations in free-play, etc.), we believe this results in an erroneous impression of Vermont Yankee capability.
- o Excessive Personnel - The combination of controllers, observers and players severely taxes the physical facilities of the various emergency facilities, raises background noise levels interfering with required communication and impedes movement of personnel and information between various organizations housed at the emergency facilities. We believe that the lack of controllers and observers is one reason our actual Emergency Plan Activation ran significantly better than have our drills.

While we do understand that, particularly in emergency planning, there is a substantial subjective component inherent in your evaluation, we believe that providing you with our assessment, and reiterating our commitment to excellence in this area is appropriate.

One other point also noted during our meeting, was that this was the first time the NRC had participated at a Vermont Yankee exercise. We were impressed with the professionalism of the NRC players and particularly with the lack of problems experienced in interfacing with counterparts in our organization. Unfortunately, the NRC players departed immediately upon concluding the exercise. We believe that a formal critique, involving both NRC and Vermont Yankee's players would have been beneficial and educational, drawing upon the NRC's knowledge of activities at other facilities. We would recommend such an activity for your consideration when your personnel are actively participating in an Emergency Planning Exercise.

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(4) General

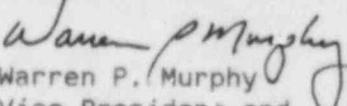
During our meeting, there was substantial comment regarding free and open discussion on the part of Vermont Yankee personnel with the NRC. We would like to take this opportunity to reiterate that it is Vermont Yankee's position that all Vermont Yankee personnel be free and open in their discussions with NRC representatives. If any problems are perceived, we reiterate our request that you bring this problem to the highest level of Vermont Yankee management necessary to remedy the problem.

An opinion was stated that VY is reluctant to acknowledge weaknesses and recognize areas where improvements can be made. Although our experience and good operational history may lead to this perception, it should also be recognized that our resources are limited. We must distinguish between good ideas and enhancements, and necessary, regulatory required fixes and changes. As such, when the necessity of an enhancement is not obvious, it has to be very clear to us that the enhancement is both valid and necessary. When our performance is perceived by us to be satisfactory in an area, especially one which has been judged satisfactory by the NRC during their audits, it makes these judgements all the more difficult to make.

Again, we appreciated the opportunity to meet with you and discuss the SALP Report. We trust you will consider our feedback in your ongoing evaluation/assessment process.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations