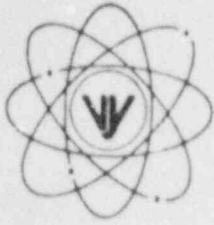


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 88-34

REPLY TO

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

May 6, 1988

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

Attn: Document Control Center

- References:
- a) License No. DPR-28 (Docket No. 50-271)
 - b) Letter, USNRC to VYNPC, NRY 88-054, Inspection No. 50-271/88-04), dated 4/6/88
 - c) Letter, USNRC to VYNPC, Inspection Report 88-03, dated 4/1/88
 - d) Letter, USNRC to VYNPC, Inspection Report 88-22, dated 12/21/84

Dear Sir:

Subject: Response to Inspection 88-04, Notice of Violation

During a NRC inspection the week of February 8, 1988, a violation of NRC requirements was identified [Reference b)]. The following information is in response to that violation.

VIOLATION

"As a result of the 10 CFR 50, Appendix R inspection conducted on February 8-11, 1988, and in accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' 10 CFR Part 2, Appendix C (Enforcement Policy 1987), the following violation was identified:

10 CFR 50, Appendix R, Section III.J, requires that emergency lighting units with at least an eight-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto.

Contrary to the above, as of February 8, 1988, emergency lighting units with at least an eight-hour battery power supply were not provided in the following safe shutdown areas and access and egress routes:

- The Control Room
- The Northeast Section of the Torus Catwalk
- Fire Area RB-5 Section

This is a Severity Level IV Violation (Supplement I)."

IEO 1
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RESPONSE

As identified in the inspection report, emergency eight-hour battery supplied lights were provided in the Control Room on February 9, 1988, prior to the inspectors' exit from Vermont Yankee.

The Northeast Section of the Torus Catwalk does contain safe shutdown equipment. However, this equipment is not required or operated until after the Emergency Diesel Generator(s) start. Since power for the Torus Catwalk lights is ultimately provided by the Diesel Generators, it was determined that no additional emergency lights are necessary for this area. As indicated in the report, this technical justification was presented to your personnel during the inspection. Vermont Yankee will submit a formal request for relief from the requirements of 10 CFR 50, Appendix R, Section III.J for this area by June 1988.

Fire Area RB-5 was reviewed, and it was again determined that no additional emergency lighting is required for this area. This determination was made following a detailed review of our design records and your Inspection Report Nos. 88-03 and 84-22. As identified in NRC Report No. 84-22, normal lighting in this area was shut off and emergency lighting was demonstrated adequately by Vermont Yankee to NRC personnel.

Subsequent to the inspection, alternate shutdown and emergency lighting design change packages previously installed were reviewed. In addition, a walk-down of those areas identified as necessary to support safe shutdown activities, including ingress and egress, were also performed. No further areas of concern, other than those identified during the inspection, were identified. Therefore, pending approval of our exemption request to be submitted by June 1988, Vermont Yankee is in full compliance with the issues identified in the subject Notice of Violation.

We trust the above information adequately addresses your concerns. However, should you have any questions or desire further information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Warren P. Murphy
Vice President and
Manager of Operations

/dm

cc: W.V. Johnston, Region I
USNRC Region I, Regional Administrator
USNRC Resident Inspector, VYNPC