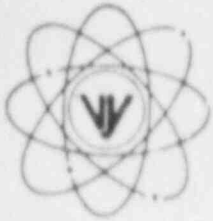


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 88-82

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM MASSACHUSETTS 01701

TELEPHONE 617-872-8100

September 30, 1988

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

Attn: Document Control Desk

- References:
- a) License No. DPR-28 (Docket No. 50-271)
 - b) Letter, USNRC to All Holders of Operating Licenses Not Reviewed to Current Licensing Criteria on Seismic Qualification of Equipment, NVEY 87-37, Generic Letter 87-02, dated 2/19/87
 - c) Letter, USNRC to Seismic Qualification Utility Group, NVEY 88-146, dated 7/29/88

Dear Sir:

Subject: Vermont Yankee Response to NRC Generic SER on SQUG Generic Implementation Procedure for Implementation of USI A-46, "Seismic Qualification of Equipment in Operating Units"

By letter dated July 29, 1988 [Reference c)], the NRC staff issued the subject Generic Safety Evaluation Report (SER) upon completion of their review of Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the subject SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. Accordingly, Vermont Yankee herewith responds to the NRC request for a plant specific schedule for implementation of the seismic verification program consistent with the same program schedule requirements of Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46" [Reference b)].

The subject SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues in future revisions to the GIP. Accordingly, Vermont Yankee's schedule and plans for implementation of the GIP are necessarily preliminary pending final NRC resolution of the open issues. It is Vermont Yankee's current plan to resolve USI A-46 by implementation of the generic criteria and methodology included in Revision C of the GIP, as clarified by the SQUG responses to the NRC SER in SQUG letter to Mr. L. Gnao, dated September 22, 1988. Assuming no major changes in the workscope described in Revision 0 of the GIP (including the criteria to be added for cable raceways, tanks, heat exchangers, and relays), Vermont Yankee plans to perform the seismic verification plant walkdown required by the GIP by

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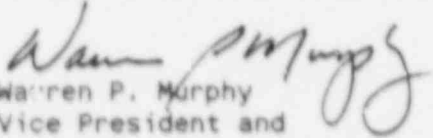
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the conclusion of the second refueling outage after receipt of the final SER Supplement resolving all open issues. Should the final NRC SER Supplement be issued by the second quarter of 1989, then the plant walkdown at Vermont Yankee is expected to be completed by about April 1992. Identification of safe shut-down equipment, gathering of necessary plant-specific data and training of our walkdown team members will be initiated prior to Vermont Yankee's next refueling outage, currently scheduled to begin in February 1989.

Vermont Yankee's implementation plan and schedule, as described above, are based on satisfying the "SQUG Commitments" identified in each section of the GIP. The subsequent guidance methodology contained in the GIP to achieve these commitments will be followed to the extent that it is deemed practical and consistent with past NRC approved methods of performing similar tasks at our facility (e.g., identification of Safe Shutdown Equipment Lists for 10 CFR 50.49 and 10 CFR 50 Appendix R programs). In addition, Vermont Yankee's implementation and schedule commitment is contingent upon our current understanding of the GIP. Accordingly, should the scope of the final revision of the GIP or the cost and effort required to implement it at our facility change significantly from the current scope and cost estimates, Vermont Yankee will reevaluate its commitment. Vermont Yankee also desires to integrate the resolution of USI A-46 with the resolution of numerous other related seismic issues. In view of the uncertainties in the requirements and schedule for resolution of these related issues, we reserve the right to revise the implementation schedule for USI A-46 at Vermont Yankee to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions with your staff, and further discussions are planned. We will advise you in writing of any changes in our implementation plans and schedule.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

/dm

cc: USNRC Regional Administrator, Region I
USNRC Resident Inspector, VYNPS