

Attachment 1

Vermont Yankee Nuclear Power Station

Vermont Yankee Operational Quality Assurance Manual (VOQAM) Revision

Marked-up VOQAM Pages

VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B  
(continued)

VII. Regulatory Guide 1.26, Rev. 3, (2/76), Quality Group Classifications and Standards for Water-, Steam- and Radioactive-Waste-Containing Components of Nuclear Power Plants

A. EXCEPTION:

~~The Vermont Yankee plant takes exception to the Regulatory Guide in its entirety. Vermont Yankee also takes exception, in general to inclusion of safety classification basis requirements in the~~  
ALTERNATIVES: Quality Assurance Program.

~~Vermont Yankee shall continue to classify structures, components and systems in accordance with ANS 22, Draft No. 4, Rev. 1, May 1973, "Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants," as in the past.~~ *for safety classification of systems, structures and components in the Final Safety Analysis Report, subject to the provisions of 10CFR 50.59.*

Title: Appendix B. Exceptions

Page: 17 of 26

Rev.: 1

VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

*When periodic review is used as the assessment method,*

Alternative:

*assessed for adequacy either periodically or continuously*  
Plant procedures will be ~~periodically reviewed~~ in accordance with administrative controls. ~~These~~ controls will establish a schedule for ~~these periodic reviews~~. All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

*are those procedures whose use is event-driven,*  
Nonroutine procedures such as Emergency Operating Procedures, Emergency Plan Implementing Procedures, ~~Off-Normal Procedures, and Operational Transient Procedures; these procedures~~ or other procedures whose use may be event driven, will be reviewed every two years.

However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review <sup>assessment</sup> and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

*Routine procedures are those regularly exercised procedures that provide the fundamental written guidance for routinely operating and maintaining the plant.*  
Routine plant procedures that have not been used for two years will be reviewed before use to determine if changes are necessary or desirable. Routine plant procedures that have been used at least biennially may be excused from further review on the basis that they receive an appropriate degree of scrutiny by individuals knowledgeable in the procedures, and are updated as necessary to ensure adequacy during suitably controlled activities such as normal procedure usage, development of plant modifications, industry experience reviews, licensing actions, training activities, corrective actions for nonconforming conditions, and quality assurance audits and surveillances. However, portions of routine procedures that aren't used within a two-year period shall be reviewed and updated as necessary prior to use.

VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

Justification:

*ANSI N18.7*

The ~~current~~ requirement to review each safety-related procedure on a biennial cycle results in the expenditure of significant technical and administrative resources. Programmatic controls and practices are in place to provide adequate ~~reviews~~, including the following:

*assessments for routine procedures,*

- The plant modification processes require that procedures affected by the modification be identified during the design change preparation, and revised prior to closure of the modification package.
- The Operating Experience Program involves the review of USNRC, INPO, and vendor-supplied information for applicability and determination of further action. This review includes an evaluation of applicable documents such as procedures and the initiation of required changes.
- Administrative controls currently exist requiring that if a procedure cannot be performed as written, a procedure change must be completed prior to continuation of the procedure.
- Temporary changes are occasionally generated during, or prior to procedure use. Current administrative controls require that those changes that are permanent shall be incorporated into the procedure via the procedure revision process.
- As part of the audit and surveillance process, procedures are evaluated as to adequacy, ease of use, proper technical content, and compliance with applicable plans and programs.

*For routine procedures, these scheduled reviews are paralleled by ongoing assessment activities that assure the adequacy of the procedures and provide for necessary updates; thus, performance of scheduled reviews in this environment of continuous assessment is redundant and produces little added benefit.*

- *As a result of licensing actions (Technical Specifications proposed change preparation, NRC inspection responses, adoption of NRC guidance, etc.), procedures are evaluated and changed as necessary.*
- *Training activities provide an opportunity for users to identify and initiate changes.*
- *Corrective actions for nonconforming conditions frequently involve updating affected procedures.*

Attachment 2

Vermont Yankee Nuclear Power Station

Vermont Yankee Operational Quality Assurance Manual (VOQAM) Revision

Retyped VOQAM Pages

VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

VII. Regulatory Guide 1.26, Rev. 3, (2/76), Quality Group Classifications and Standards for Water-, Steam- and Radioactive-Waste-Containing Components of Nuclear Power Plants

A. EXCEPTION:

Vermont Yankee takes exception to the Regulatory Guide in its entirety. Vermont Yankee also takes exception, in general, to inclusion of safety classification basis requirements in the Quality Assurance Program.

ALTERNATIVES:

Vermont Yankee will identify appropriate industry-standard criteria for safety classification of systems, structures and components in the Final Safety Analysis Report, subject to the provisions of 10CFR50.59.

# VERMONT YANKEE NUCLEAR POWER CORPORATION

## APPENDIX B

(continued)

### Alternative:

Plant procedures will be assessed for adequacy either periodically or continuously in accordance with administrative controls. When periodic review is used as the assessment method, these controls will establish a schedule for review.

All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

Routine procedures are those regularly exercised procedures that provide the fundamental written guidance for routinely operating and maintaining the plant. Routine plant procedures that have not been used for two years will be reviewed before use to determine if changes are necessary or desirable. Routine plant procedures that have been used at least biennially may be excused from further review on the basis that they receive an appropriate degree of scrutiny by individuals knowledgeable in the procedures, and are updated as necessary to ensure adequacy during suitably controlled activities such as normal procedure usage, development of plant modifications, industry experience reviews, licensing actions, training activities, corrective actions for nonconforming conditions, and quality assurance audits and surveillances.

Nonroutine procedures are those procedures whose use is event-driven, such as Emergency Operating Procedures, Emergency Plan Implementing Procedures, Off-Normal Procedures, and Operational Transient Procedures; these procedures will be reviewed every two years. However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review/assessment and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

# VERMONT YANKEE NUCLEAR POWER CORPORATION

## APPENDIX B

(continued)

### Justification:

The ANSI N18.7 requirement to review each safety-related procedure on a biennial cycle results in the expenditure of significant technical and administrative resources. For routine procedures, these scheduled reviews are paralleled by ongoing assessment activities that assure the adequacy of the procedures and provide for necessary updates; thus, performance of scheduled reviews in this environment of continuous assessment is redundant and produces little added benefit. Programmatic controls and practices are in place to provide adequate assessments for routine procedures, including the following:

- The plant modification processes require that procedures affected by the modification be identified during the design change preparation and revised prior to closure of the modification package.
- The Operating Experience Program involves the review of USNRC, INPO, and vendor-supplied information for applicability and determination of further action. This review includes an evaluation of applicable documents such as procedures and the initiation of required changes.
- Administrative controls currently exist requiring that if a procedure cannot be performed as written, a procedure change must be completed prior to continuation of the procedure.
- Temporary changes are occasionally generated during or prior to procedure use. Current administrative controls require that those changes that are permanent shall be incorporated into the procedure via the procedure revision process.
- As part of the audit and surveillance process, procedures are evaluated as to adequacy, ease of use, proper technical content, and compliance with applicable plans and programs.
- As a result of licensing actions (Technical Specification proposed change preparation, NRC inspection responses, adoption of NRC guidance, etc.), procedures are evaluated and changed as necessary.
- Training activities provide an opportunity for users to identify and initiate changes.



VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

- Corrective actions for nonconforming conditions frequently involve updating affected procedures.

**Attachment 3**

**Vermont Yankee Nuclear Power Station**

**Vermont Yankee Operational Quality Assurance Manual (VOQAM) Revision**

**Summary of Vermont Yankee Commitments**

## SUMMARY OF VERMONT YANKEE COMMITMENTS

**BVY NO.: BVY 99-120**

The following table identifies commitments made in this document by Vermont Yankee. Any other actions discussed in the submittal represent intended or planned actions by Vermont Yankee. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager of any questions regarding this document or any associated commitments.

| COMMITMENT   | COMMITTED DATE<br>OR "OUTAGE"                               |
|--|---|
| <b>Incorporate revised pages into the VOQAM upon receipt of NRC approval of reductions in commitment identified in BVY 99-120.</b> | <b>Within 60 days of receipt of approval (est. 6/01/00)</b> |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |