



VERMONT YANKEE NUCLEAR POWER CORPORATION

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November 16, 1999

BVY 99-146

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

References: (a) Letter, VYNPC to USNRC, "Proposed Revision to the Vermont Yankee Operational Quality Assurance Manual," BVY 99-120, dated November 12, 1999.

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Corrected Marked-up Page to Proposed VOQAM Revision

Reference (a) transmitted a proposed revision to the Vermont Yankee (VY) Operational Quality Assurance Manual (VOQAM). Subsequent to mailing the submittal, VY discovered that one of the pages in the attached marked-up version of the VOQAM did not receive a change that was made to the typed version. The language requiring review of portions of procedures prior to use that have not been used in a two year period was removed because VY believes this action is implicit in the earlier statement regarding review of entire procedures in these same circumstances. This level of detail more properly belongs in the VOQAM implementing procedures, not in the program document. Attached for inclusion in the previous submittal package is a corrected mark-up of Page 21 of 26 of Appendix B to the VOQAM, which will make the marked-up version consistent with the typed one. Please replace the existing page with this corrected copy. VY regrets any inconvenience this error may have caused.

If you have any questions about this submittal, please contact Mr. Wayne M. Limberger at (802) 258-4237.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Gautam Sen
Licensing Manager

cc: USNRC Region 1 Administrator
USNRC Resident Inspector – VYNPS
USNRC Project Manager – VYNPS
Vermont Department of Public Service

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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 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.

are those procedures whose use is event-driven,
Nonroutine procedures such as Emergency Operating Procedures, Emergency Plan Implementing ~~Off-Normal Procedures, and Operational Transient Procedures; these procedures~~ 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 ^{assessment} 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 surveillance.

SUMMARY OF VERMONT YANKEE COMMITMENTS

BVY NO.: 99-146

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 OR "OUTAGE"
See original submittal BVY 99-120 for commitments. No new commitments are being added by this letter.	See BVY 99-120