



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 183 TO FACILITY OPERATING LICENSE NO. DPR-28

VERMONT YANKEE NUCLEAR POWER CORPORATION

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

1.0 INTRODUCTION

By letter dated October 21, 1999, the Vermont Yankee Nuclear Power Corporation (the licensee) submitted a request to amend the Vermont Yankee Nuclear Power Station (VY) Technical Specifications (TSs). The proposed amendment would correct two textual errors and change the designation of a referenced figure.

The licensee stated that two administrative errors were introduced in previous amendments and proposed to correct these errors. In addition, as part of VY's Final Safety Analysis Report (FSAR) improvement initiative, each FSAR figure that duplicates a plant drawing is being eliminated from the FSAR and the associated plant drawing is being incorporated into the FSAR by reference. This action results in the need to update only one document versus two, thereby eliminating unnecessary administrative burden and the potential for conflicting documentation. As a result of the FSAR change, a TS change was proposed to reference the appropriate plant drawing instead of the FSAR figure.

2.0 EVALUATION

The licensee proposed deleting the footnote at the bottom of current TS page 122. The subject footnote reads: "Detector Levels A and C of one LPRM string per core octant plus detector Levels A and C of one LPRM string in the center of the core shall be monitored." The licensee stated that this change would correct a past administrative error. The footnote should have been deleted through the issuance of License Amendment 146. The footnote applied to a statement in (prior existing) Specification 4.6.G. Specification 4.6.G was deleted by License Amendment 146.

Amendment 146 was issued by the NRC in response to a request by VY dated March 31, 1994 (Proposed Change 173) and supplemented by letters dated September 9, 1994, and June 22, 1995. A review of this correspondence indicates that VY had first proposed deletion of the subject footnote in its original request of March 31, 1994. However, when VY provided updated pages by letter dated June 22, 1995, the footnote was inadvertently retained. This was an administrative error. The footnote should have been deleted since its only antecedent appeared in the deleted Specification 4.6.G.

The staff has reviewed the proposed changes and has concluded that the changes do not change the meaning of the TS. Deletion of this footnote was approved by Amendment 146 and there is no reference to the footnote on the existing TS page. The proposed changes are therefore acceptable.

The licensee also proposed changing current Specification 3.8.N.1 (page 179) by deleting the reference to "Section 6.12" of the TS. Revised Specification 3.8.N.1 would then read: "The solid radwaste system shall be used in accordance with a Process Control Program to process wet radioactive waste (spent resins/filter sludges) to meet shipping and burial ground requirements." This change would correct a past administrative error.

The NRC issued License Amendment 171 in response to VY's proposed change 208. Among other things, Amendment 171 relocated TS Section 6.12, "Process Control Program" into the VY Technical Requirements Manual. Proposed Change 208 consisted of a comprehensive update of TS Section 6.0 with several subsections being relocated to other licensee-controlled documents, and the remaining specifications being reformatted. The licensee stated that when proposed change 208 was prepared, word searches were conducted to identify every instance where a Section 6.0 requirement was referenced elsewhere in the TS. References to Section 6.0 specifications were identified and conforming changes were made to the TSs necessitated by the re-numbering and re-formatting of Section 6.0 Specifications. Due to an administrative error, the reference to "Section 6.12" appearing in Specification 3.8.N.1 was not identified at that time as needing change. Specification 3.8.N.1 should have been revised as part of proposed change 208 and Amendment 171.

The staff has reviewed the proposed changes and has concluded that the changes do not change the meaning of the TS. Reference to Section 6.12 is not correct and should have been deleted with Amendment 171. The proposed changes are therefore acceptable.

The licensee also proposed changes to TS 1.0.FF (page 5) and TS 5.1 (page 253) to reference "plant drawing 5920-6245" rather than "Figure 2.2-5 in the FSAR." The licensee stated that, as an initiative of VY's FSAR improvement project, FSAR figures having a corresponding controlled plant drawing are being deleted from the FSAR and the associated controlled drawing is being incorporated into the FSAR by reference. Any future changes to these FSAR-related drawings will be controlled in accordance with 10 CFR 50.59. The incorporation of drawings by reference and the elimination of figures from the FSAR will reduce unnecessary update burdens and will avoid instances where duplicate figures might not be in agreement, thus avoiding confusion and other potential errors. VY FSAR Figure 2.2-5, "Plan Showing Exclusion Area and Restricted Area Boundaries" was derived from plant drawing 5920-6245. The subject plant drawing contains the information given in the FSAR figure, and the plot plan is identical. By re-designating the references in TSs 1.0.FF and 5.1 from "FSAR Figure 2.2-5" to "plant drawing 5920-6245," the information and level of detail are being maintained. Plant drawing 5920-6245 contains the information of FSAR Figure 2.2-5 and is maintained under the same process (i.e., 10 CFR 50.59) for controlling changes.

The staff has reviewed the proposed changes and has concluded that the changes do not change the meaning of the TS. The proposed changes are therefore acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Vermont State official was notified of the proposed issuance of the amendment. The State official had no comment.

### 4.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact has been prepared and published (65 FR 1648) in the Federal Register on January 11, 2000. Based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: January 11, 2000