

VERMONT YANKEE NUCLEAR POWER CORPORATION

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September 22, 2000
BVY 00-87

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Reference: (a) Letter, VYNPC to USNRC, "Technical Specification Proposed Change No. 237, Primary Containment Isolation System Initiation Signal Clarification," BVY 00-84, dated September 14, 2000

Subject: **Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Technical Specification Proposed Change No. 237 - Update
Primary Containment Isolation System Initiation Signal Clarification**

By Reference (a), Vermont Yankee (VY) requested an amendment to Facility Operating License, DPR-28, and its associated Technical Specifications (TS). The Proposed Change involves clarification of primary containment isolation signals.

VY is hereby providing the following supplemental information to support the conclusion that the proposed change is consistent with the VY accident analysis.

The proposed change does not affect the ability of the primary containment isolation or emergency core cooling systems to perform their required safety functions. The VY accident analysis assumes valves V10-39A/B, V10-34A/B, V10-26A/B, V10-31A/B and V10-38A/B are in their normally closed position prior to accident initiation, thereby maintaining primary containment integrity and ensuring 10CFR100 limits are met. The closed position of these valves prior to the accident also facilitates alignment of the Residual Heat Removal system in Low Pressure Coolant Injection mode to ensure adequate core cooling in accordance with 10CFR50.46. A logic signal to maintain these valves in a closed position results from a 1) low-low reactor vessel level and low reactor pressure or 2) high drywell pressure condition. Therefore, it is unnecessary for these valves to close on a low reactor vessel level signal.

These valves may be opened on a limited basis during normal plant operation, as allowed by Technical Specifications, for the following purposes:

RHR Valve Operability Testing (quarterly): The V10-39A/B, V10-34A/B, V10-26A/B, V10-31A/B and V10-38A/B valves are stroked open and closed one at a time for inservice operability testing in accordance with the VY Inservice Testing Program. During this testing, the isolation valve not being tested in each line is verified closed in accordance with the surveillance procedure. This administrative control ensures primary containment integrity is maintained and adequate core cooling is available if needed, thereby validating the accident analysis assumptions.

ADD1

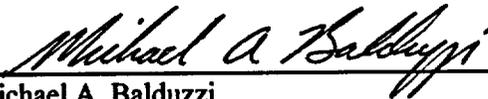
Operation of RHR in Torus Cooling Mode: Torus cooling valves (V10-34A/B, V10-39A/B) may be open for a limited time during normal operation in support of torus water level or temperature control. If an accident were to occur in this condition, these valves would automatically isolate on a 1) low-low reactor vessel level and low reactor pressure or 2) high drywell pressure condition. Closure of these valves ensures primary containment integrity is maintained and adequate core cooling is available if needed. The probability of an accident occurring while in torus cooling mode is insignificant due to the limited duration of operation in this configuration as allowed by Technical Specifications. Therefore, the difference in the isolation signal setpoint is inconsequential.

This supplemental information falls within the scope of the original amendment request. The bases for the Proposed Change, safety considerations and determination of no significant hazard consideration are unchanged from those discussed in Reference (a).

If you have any questions on this transmittal, please contact Mr. Brian Hobbs at (802) 258-4116.

Sincerely,

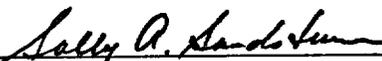
VERMONT YANKEE NUCLEAR POWER CORPORATION



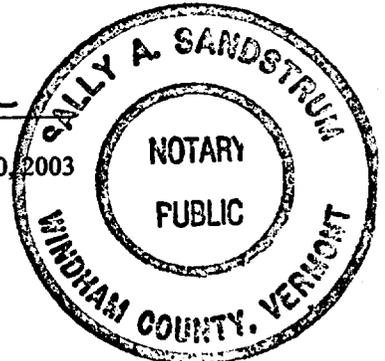
Michael A. Balduzzi
Vice President, Operations

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Michael A. Balduzzi, who, being duly sworn, did state that he is Vice President, Operations of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.



Sally A. Sandstrum, Notary Public
My Commission Expires February 10, 2003



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