

VERMONT YANKEE NUCLEAR POWER CORPORATION

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March 29, 2001
BVY 01-27

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

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Supplement to Technical Specification Proposed Change No. 244**

On December 19, 2000, Vermont Yankee (VY) submitted to the Staff a combined Proposed Change to the Technical Specifications and Exemption Request¹. The proposed change would revise the reactor vessel pressure/temperature (P/T) limit curves specified in TS 3.6.A.1, "Reactor Coolant System - Pressure and Temperature Limitations," as graphically represented in Figure 3.6.1, for reactor heatup, cooldown, and critical operation, as well as for inservice hydrostatic and leak tests.

On March 7, 2001, a teleconference was held with the Staff to discuss the proposed change. During this teleconference, the Staff expressed concerns regarding the neutron fluence calculations that were utilized as an input to the revised P/T Curves. The Staff also proposed that the P/T limits be valid for a limited period of time. The conservative ART_{NDT} values utilized by VY in Proposed Change No. 244 equated to a minimum end-of-life surface fluence of 5 times the peak end-of-life calculated fluence. While VY believes that this provided substantial margin for safe operation through 4.46E8 MWH(T)), VY has agreed to the Staff's proposal in the interest of approval of the License Amendment. Based upon the above, VY hereby requests that the proposed P/T Limits be effective through the end of Cycle 23.

The operating portion of Cycle 23 is currently scheduled to end in April of 2004. Attached to this letter are the re-typed Figures which identify that the curves are "Valid Through End of Cycle 23." It is noted that these Figures continue to be based upon a conservative ART_{NDT} that will bound the affect of fluence on reactor materials through 4.46E8 MWH(T), which is the equivalent of 32 effective full power years (EFPY). It is estimated that at the end of Cycle 23, the reactor will have experienced equal to or less than 25.5 EFPY's.

VY will continue to closely follow the industry activities in the area of fluence calculations. To that extent, VY intends to promptly utilize an NRC approved fluence methodology (e.g.: General

¹ Reference Vermont Yankee Nuclear Power Corporation letter to the USNRC, BVY 00-113, "Technical Specification Proposed Change No. 244, Revised P/T Curves and Exemption Request to use Code Cases N-588 and N-640," dated December 19, 2000.

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VERMONT YANKEE NUCLEAR POWER CORPORATION

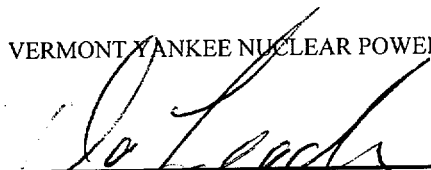
Electric's) once it is available. Once the approved methodology is available, VY will submit to the NRC this information in support of a License Amendment that will eliminate the "sunset clause" currently contained on the Figures.

The determination of no significant hazards consideration that accompanied our Proposed Technical Specification Change remains unchanged by this submittal.

If you have any questions on this transmittal, please contact Mr. Thomas B. Silko at (802) 258-4146.


Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Don M. Leach
Vice President, Engineering

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Don M. Leach, who, being duly sworn, did state that he is Vice President, Engineering 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.


Thomas B. Silko, Notary Public
My Commission Expires February 10, 2003

Attachment

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

VERMONT YANKEE NUCLEAR POWER CORPORATION

Docket No. 50-271

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Attachment

Vermont Yankee Nuclear Power Station

Supplement to Proposed Technical Specification Change No. 244

Revised P/T Curves

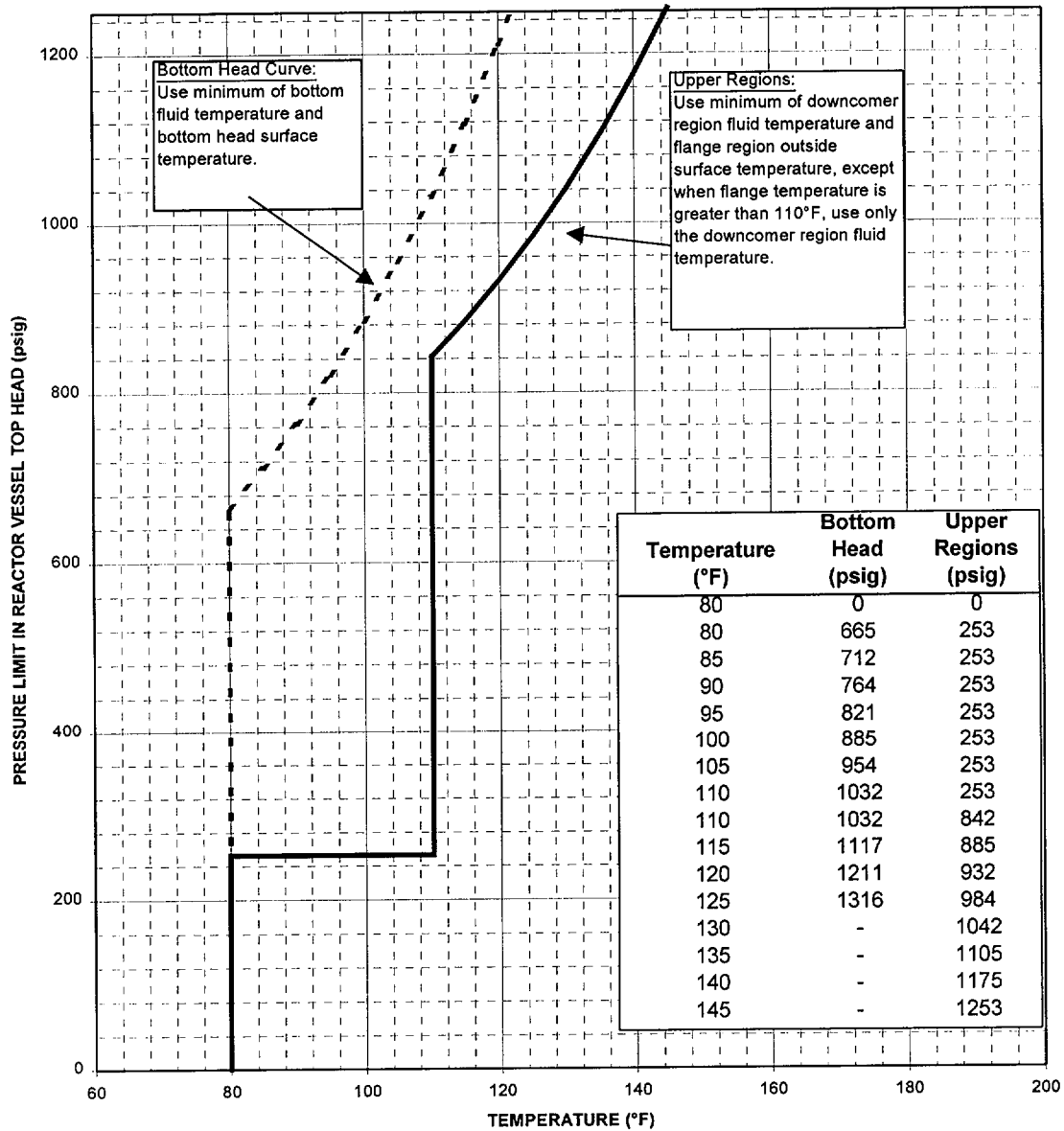
Retyped Technical Specification Figures

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FIGURE 3.6.1

Reactor Vessel Pressure-Temperature Limitations Hydrostatic Pressure and Leak Tests, Core Not Critical

40°F/hr Heatup/Cooldown Limit
Valid Through End of Cycle 23

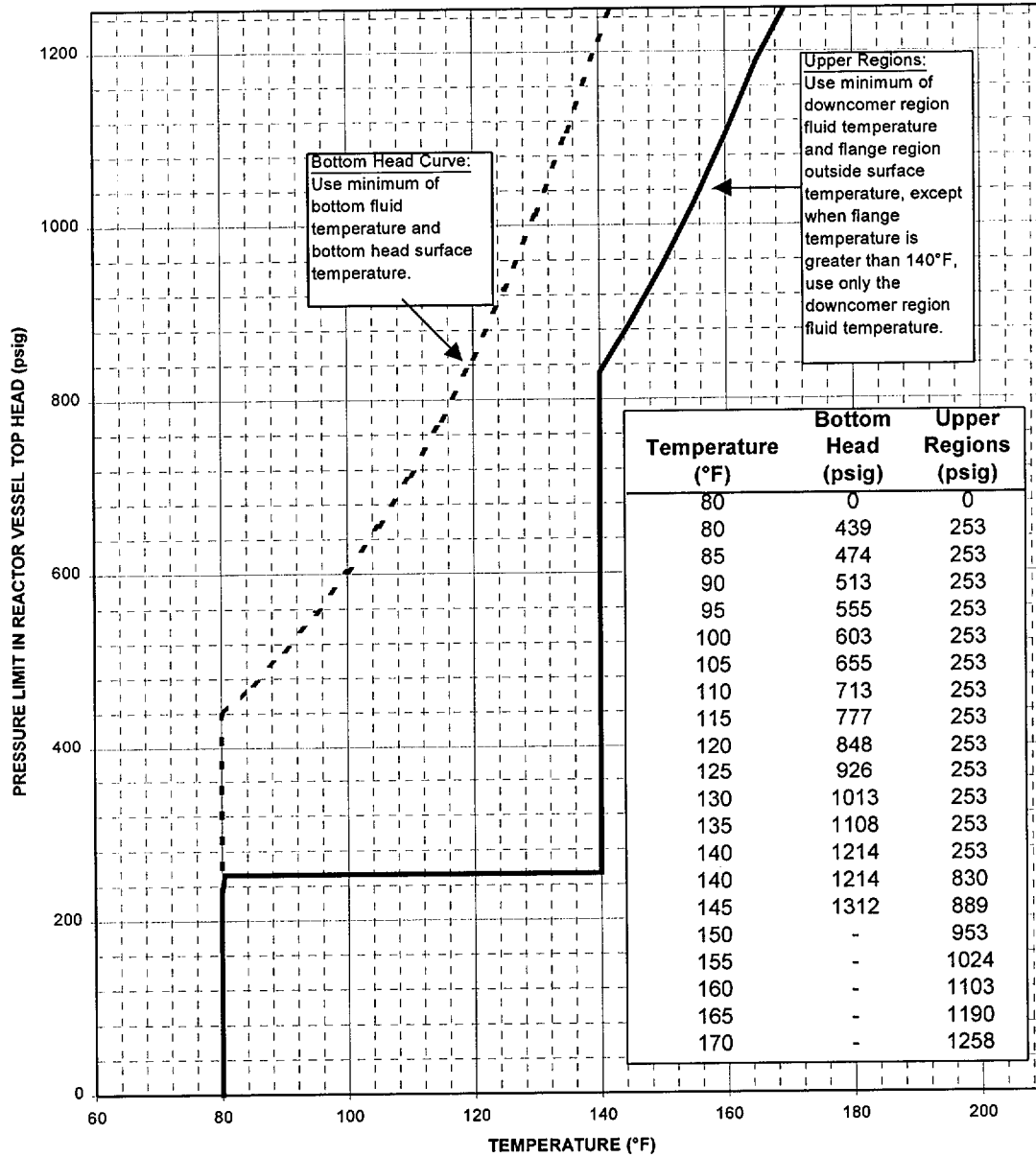


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FIGURE 3.6.2

Reactor Vessel Pressure-Temperature Limitations Normal Operation, Core Not Critical

100°F/hr Heatup/Cooldown Limit
Valid Through End of Cycle 23



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FIGURE 3.6.3

Reactor Vessel Pressure-Temperature Limitations Normal Operation, Core Critical

100°F/hr Heatup/Cooldown Limit
If Pressure < 253 psig, Water Level must be within
Normal Range for Power Operation
Valid Through End of Cycle 23

