

August 11, 1986

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Docket No.: 50-271

Mr. R. W. Capstick
Licensing Engineer
Vermont Yankee Nuclear Power
Corporation
1671 Worcester Road
Framingham, Massachusetts 01701

Dear Mr. Capstick:

The Commission has issued the enclosed Amendment No. 95 to Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station. The amendment consists of changes to the Technical Specifications in response to your application dated March 4, 1985.

The amendment revises the Technical Specifications to reflect changes to reporting requirements due to a recent rule change to 10 CFR 50.72 and 50.73, deletion of requirements for monthly reporting of safety-related maintenance activities, and a number of administrative changes which are editorial in nature or corrections of errors.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

/s/

Vernon L. Rooney, Project Manager
BWR Project Directorate #2
Division of BWR Licensing

Enclosures:

- 1. Amendment No. 95 to License No. DPR-28
- 2. Safety Evaluation

cc w/enclosure:
See next page

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Mr. R. W. Capstick
Vermont Yankee Nuclear Power Corporation
Vermont Yankee Nuclear Power Station

cc:

Mr. J. G. Weigand
President & Chief Executive Officer
Vermont Yankee Nuclear Power Corp.
R. D. 5, Box 169
Ferry Road
Brattleboro, Vermont 05301

Mr. Donald Hunter, Vice President
Vermont Yankee Nuclear Power Corp.
1671 Worcester Road
Framingham, Massachusetts 01701

New England Coalition on
Nuclear Pollution
Hill and Dale Farm
R. D. 2, Box 223
Putney, Vermont 05346

Mr. Walter Zaluzny
Chairman, Board of Selectman
Post Office Box 116
Vernon, Vermont 05345

J. P. Pelletier, Plant Manager
Vermont Yankee Nuclear Power Corp.
Post Office Box 157
Vernon, Vermont 05354

Raymond N. McCandless
Vermont Division of Occupational
& Radiological Health
Administration Building
10 Baldwin Street
Montpelier, Vermont 05602

Honorable John J. Easton
Attorney General
State of Vermont
109 State Street
Montpelier, Vermont 05602

John A. Ritscher, Esquire
Ropes & Gray
225 Franklin Street
Boston, Massachusetts 02110

W. P. Murphy, Vice President &
Manager of Operations
Vermont Yankee Nuclear Power Corp.
R. D. 5, Box 169
Ferry Road
Brattleboro, Vermont 05301

Mr. Gerald Tarrant, Commissioner
Vermont Department of Public Service
120 State Street
Montpelier, Vermont 05602

Public Service Board
State of Vermont
120 State Street
Montpelier, Vermont 05602

Vermont Yankee Decommissioning
Alliance
Box 53
Montpelier, Vermont 05602-0053

Resident Inspector
U. S. Nuclear Regulatory Commission
Post Office Box 176
Vernon, Vermont 05354

Vermont Public Interest
Research Group, Inc.
43 State Street
Montpelier, Vermont 05602

Thomas A. Murley
Regional Administrator
Region I Office
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406



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

VERMONT YANKEE NUCLEAR POWER CORPORATION

DOCKET NO. 50-271

VERMONT YANKEE NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 95
License No. DPR-28

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Vermont Yankee Nuclear Power Corporation (the licensee) dated March 4, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. DPR-28 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications, contained in Appendix A, as revised through Amendment No. 95, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 11, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 95

FACILITY OPERATING LICENSE NO. DPR-28

DOCKET NO. 50-271

1. Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

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1.0 DEFINITIONS

The succeeding frequently used terms are explicitly defined so that a uniform interpretation of the specifications may be achieved.

- A. Reportable Occurrence - The equivalent of a reportable event which shall be any of the conditions specified in Section 50.73 to 10CFR Part 50.
- B. Alteration of the Reactor Core - The act of moving any component in the region above the core support plate, below the upper grid and within the shroud. Normal movement of the control rods, or the neutron detectors is not defined as a core alteration.
- C. Hot Standby - Hot standby means operation with the reactor critical and the main steam line isolation valves closed.
- D. Immediate - Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action.
- E. Instrument Calibration - An instrument calibration means the adjustment of an instrument signal output so that it corresponds, within acceptable range and accuracy, to a known valve(s) of the parameter which the instrument monitors. Calibration shall encompass the entire instrument including actuation, alarm, or trip. Response time as specified is not part of the routine instrument calibration but will be checked once per operating cycle.
- F. Instrument Check - An instrument check is qualitative determination of acceptable operability by observation of instrument behavior during operation. This determination shall include, where possible, comparison of the instrument with other independent instruments measuring the same variable.

3.8 LIMITING CONDITIONS FOR OPERATION

4.8 SURVEILLANCE REQUIREMENTS

C. Liquid Radwaste Treatment

1. The liquid radwaste treatment system shall be used in its designed modes of operation to reduce the radioactive materials in the liquid waste prior to its discharge when the estimated doses due to the liquid effluent from the site, when averaged with all other liquid release over the last month, would exceed 0.06 mrem to the total body, or 0.2 mrem to any organ.

D. Liquid Holdup Tanks

1. The quantity of radioactive material contained in any outside tank* shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

C. Liquid Radwaste Treatment

1. See Specification 4.8.B.1.

D. Liquid Holdup Tanks

1. The quantity of radioactive material contained in each of the liquid holdup tanks* shall be determined to be within the limits of Specification 3.8.D.1 by analyzing a representative sample of the tank's contents within one week following the addition of radioactive materials to the tank. One sample may cover multiple additions.

*NOTE: Tanks included in this Specification are only those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank's contents, or that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

Bases:

3.11C Minimum Critical Power Ratio (MCPR)

Operating Limit MCPR

1. The MCPR Operating Limit is a cycle-dependent parameter which can be determined for a number of different combinations of operating modes, initial conditions, and cycle exposures in order to provide reasonable assurance against exceeding the Fuel Cladding Integrity Safety Limit (FCISL) for potential abnormal occurrences. The MCPR operating limits are justified by the analyses, the results of which are presented in the current cycle's Core Performance Analysis Report.

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2. Annual Report

An annual report covering the previous calendar year shall be submitted prior to March 1 of each year. The annual report shall include a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions, 1/ e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD or film badge measurement. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

3. Monthly Statistical Report

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Office of Management Information and Program Control, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the appropriate Regional Office, to arrive no later than the fifteenth of each month following the calendar month covered by the report. These reports shall include a narrative summary of operating experience during the report period which describes the operation of the facility.

B. Reportable Occurrences

This section deleted.

1/ This tabulation supplements the requirements of 20.407 of 10CFR Part 20.

C. Unique Reporting Requirements**1. Semiannual Effluent Release Report**

- a. Within 60 days after January 1 and July 1 of each year, a report shall be submitted covering the radioactive content of effluents released to unrestricted areas during the previous six months of operation.
- b. The radioactive effluent release reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, Revision 1, June 1974, "Measuring, Evaluating and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants", with data summarized on a quarterly basis following the format of Appendix B thereof. For solid wastes the format for Table 3 in Appendix B of Regulatory Guide 1.21 shall be supplemented with three additional categories: class of solid wastes (as defined by 10CFR Part 61), type of container (e.g., LSA, Type A, Type B, Large Quantity), and solidification agent or absorbent, if any.

In addition, the radioactive effluent release report to be submitted 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.* This same report (or a supplement to it to be submitted within 180 days of January 1 each year) shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit during the previous calendar year. (The semiannual effluent release report submitted within 60 days of July 1 each year need not contain any dose estimates from the previous 6 months' effluent releases.) The effluent reported submitted after January 1 each year shall also include an assessment of the radiation doses from radioactive effluents to

*In lieu of submission with the first half year radioactive effluent release report, the licensee has the options of retaining this summary of required meteorological data in a file that shall be provided to the NRC upon request.

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member(s) of the public due to any allowed recreational activities inside the site boundary during the previous calendar year. All assumptions used in making these assessments (e.g., specific activity, exposure time and location) shall be included in these reports. For any batch or discrete gas volume releases, the meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents (as determined by sampling frequency and measurement) shall be used for determining the gaseous pathway doses. For radioactive materials released in continuous effluent streams, quarterly average meteorological conditions concurrent with the quarterly release period shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the Off-Site Dose Calculation Manual (ODCM).

With the limits of Specification 3.8.M.1 being exceeded during the calendar year, the radioactive effluent release report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed real member(s) of the public from reactor releases (including doses from primary effluent pathways and direct radiation) for the previous calendar year to show conformance with 40CFR190, Environmental Radiation Protection Standards for Nuclear Power Operation.

The radioactive effluent release reports shall include a list and description of unplanned releases from the site to site boundary of radioactive materials in gaseous and liquid effluents made during the reporting period.

With the quantity of radioactive material in any outside tank exceeding the limit of Specification 3.8.D.1, describe the events leading to this condition in the next Radioactive Effluent Release Report.

If inoperable radioactive liquid effluent monitoring instrumentation is not returned to operable status prior to the next release pursuant to Note 4 of Table 3.9.1, explain in the next Radioactive Effluent Release Report the reason(s) for delay in correcting the inoperability.

If inoperable gaseous effluent monitoring instrumentation is not returned to operable status within 30 days pursuant to Note 5 of Table 3.9.2, explain in the next Radioactive Effluent Release Report the reason(s) for delay in correcting the inoperability.

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With milk samples no longer available from one or more of the sample locations required by Table 3.9.3, identify the cause(s) of the sample(s) no longer being available, identify the new location(s) for obtaining available replacement samples, and include revised ODCM figure(s) and table(s) reflecting the new location(s) in the next Radioactive Effluent Release Report.

With a land use census identifying one or more locations which yield at least a 20 percent greater dose or dose commitment than the values currently being calculated in Specification 4.8.G.1, identify the new location(s) in the next Radioactive Effluent Release Report.

Changes made during the reporting period to the Process Control Program (PCP) and to the Off-Site Dose Calculation Manual (ODCM), shall be identified in the next Radioactive Effluent Release Report.

2. Special Reports

Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report.

a. Liquid Effluents, Specifications 3.8.B and 3.8.C.

With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the limits of Specification 3.8.B.1, prepare and submit to the Commission within 30 days a special report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions taken to assure that subsequent releases will be in compliance with the limits of Specification 3.8.B.1.

With liquid radwaste being discharged without processing through appropriate treatment systems and estimated doses in excess of Specification 3.8.C.1, prepare and submit to the Commission within 30 days a special report which includes the following information:

- (1) explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reasons for the inoperability;

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- (2) action(s) taken to restore the inoperable equipment to operable status; and
- (3) Summary description of action(s) taken to prevent a recurrence.

b. Gaseous Effluents, Specifications 3.8.F, 3.8.G, 3.8.H, and 3.8.I.

With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the limits of Specification 3.8.F.1, prepare and submit to the Commission within 30 days a special report which identifies the cause(s) for exceeding the limit(s) and the corrective action(s) taken to assure that subsequent releases will be in compliance with the limits of Specification 3.8.F.1. With the calculated dose from the release of Iodine-131, Iodine-133, tritium, and/or radionuclides in particulate form exceeding any of the limits of Specification 3.8.G.1, prepare and submit to the Commission within 30 days a special report which identifies the cause(s) for exceeding the limit(s) and the corrective action(s) taken to assure that subsequent releases will be in compliance with the limits of Specification 3.8.G.1.

With gaseous radwaste being discharged without processing through appropriate treatment systems as defined in Specification 3.8.H.1 for more than seven (7) consecutive days, or in excess of the limits of Specification 3.8.I.1, prepare and submit to the Commission within 30 days a special report which includes the following information:

- (1) explanation of why gaseous radwaste was being discharged without treatment (Specification 3.8.H.1), or with resultant doses in excess of Specification 3.8.I.1, identification of any inoperable equipment or subsystems, and the reasons for the inoperability;
- (2) action(s) taken to restore the inoperable equipment to operable status; and
- (3) summary description of action(s) taken to prevent a recurrence.

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c. Total Dose, Specification 3.8.M.

With the calculated dose from the release of radioactive materials in liquid or gaseous effluents exceeding the limits of Specification 3.8.M, prepare and submit to the Commission within 30 days a special report which defines the corrective action(s) to be taken to reduce subsequent releases to prevent recurrence of exceeding the limits of Specification 3.8.M and includes the schedule for achieving conformance with these limits. This special report, required by 10CFR Part 20.405c, shall include an analysis that estimates the radiation exposure (dose) to a member of the public from station sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated doses exceed any of the limits of Specification 3.8.M, and if the release condition resulting in violation of 40CFR Part 190 has not already been corrected, the special report shall include a request for a variance in accordance with the provisions of 40CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

d. Radiological Environmental Monitoring, Specification 3.9.C.

With the level of radioactivity as the result of plant effluents in an environmental sampling media at one or more of the locations specified in Table 3.9.3 exceeding the reporting levels of Table 3.9.4, prepare and submit to the Commission within 30 days from the receipt of the Laboratory Analyses a special report which includes an evaluation of any release conditions, environmental factors or other factors which caused the limits of Table 3.9.4 to be exceeded. This report is not required if the measured level of radioactivity was not the result of plant effluents, however, in such an event, the condition shall be reported and described in the annual Radiological Environmental Surveillance Report.

e. Land Use Census, Specification 3.9.D.

With a land use census not being conducted as required by Specification 3.9.D, prepare and submit to the Commission within 30 days a special report which identifies the reasons why the survey was not conducted, and what steps are being taken to correct the situation.

f. Vital Fire Protection System, Specification 3.13

Where required by Section 3.13, special reports shall be submitted to the Commission following the discovery of certain inoperable sensors, instruments, components, or systems in the vital fire protection system.

Note: Routine surveillance testing or design modification of sensors, instruments, components, or systems which lead to operation of sensors, instruments, components, or systems in a degraded mode do not require special reporting except where tests themselves reveal a degraded mode.

3. Environmental Radiological Monitoring

Radiological Environmental Surveillance Reports covering the operation of the unit during previous calendar year shall be submitted prior to May 1 of each year.

The annual Radiological Environmental Surveillance Report shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with operational controls (as appropriate), and previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment.

The annual Radiological Environmental Surveillance Report shall include summarized and tabulated results of all radiological environmental samples taken during the report period pursuant to the table and figures in the ODCM. In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

With the level of radioactivity in an environmental sampling media at one or more of the locations specified in Table 3.9.3 exceeding the reporting levels of Table 3.9.4, the condition shall be described in the next annual Radiological Environmental Surveillance Report only if the measured level of radioactivity was not the result of plant effluents. With the radiological environmental monitoring program not being conducted as specified in Table 3.9.3, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence shall be included in the next annual Radiological Environmental Surveillance Report.

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The annual Radiological Environmental Surveillance Report shall also include the results of the land use census required by Specification 3.9.D. A summary description of the radiological environmental monitoring program including a map of all sampling locations keyed to a table giving distances and directions from the reactor shall be in the reports. If new environmental sampling locations are identified in accordance with Specification 3.9.D, the new locations shall be identified in the next annual Radiological Environmental Surveillance Report.

The reports shall also include a discussion of all analyses in which the LLD required by Table 4.9.3 was not achievable.

The results of licensee participation in the intercomparison program required by Specification 3.9.E shall be included in the reports. With analyses not being performed as required by Specification 3.9.E, the corrective actions taken to prevent a recurrence shall be report to the Commission in the next annual Radiological Environmental Surveillance Report.

6.8 FIRE PROTECTION INSPECTION

- A. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- B. An inspection and audit by an outside fire consultant shall be performed at intervals no greater than 3 years.

6.9 ENVIRONMENTAL QUALIFICATION

- A. By no later than June 30, 1982, all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of Division of Operating Reactors, "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors" (DOR Guidelines); or NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these documents are attached to Order for Modification of License DPR-28, dated October 24, 1980.
- B. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise qualified.

6.10 INTEGRITY OF SYSTEMS OUTSIDE CONTAINMENT

A program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels will be implemented. This program shall include the following:

- A. Provisions establishing preventive maintenance and periodic visual inspection requirements.
- B. System leakage inspections, to the extent permitted by system design and radiological conditions, for each system at a frequency not to exceed refueling cycle intervals. The systems subject to this testing are: (1) Residual Heat Removal, (2) Core Spray, (3) Reactor Water Cleanup, (4) HPCI, (5) RCIC, and (6) Sampling Systems.

6.11 IODINE MONITORING

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas* under accident conditions will be implemented. This program shall include the following:

- A. Training of personnel.
- B. Procedures for monitoring.
- C. Provisions for maintenance of sampling and analysis equipment.

6.12 PROCESS CONTROL PROGRAM (PCP)

A process control program shall contain the sampling, analysis, tests, and determinations by which wet radioactive waste from liquid systems is assured to be converted to a form suitable for off-site disposal.

- A. Licensee initiated changes to the PCP:

*Areas requiring personnel access for establishing hot shutdown condition.

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1. Shall be submitted to the Commission in the semiannual Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to support the rationale for the change without benefit of additional or supplemental information.
 - b. A determination that the change did not reduce the overall conformance of the dewatered spent resins/filter media waste product to existing criteria for solid waste shipments and disposal.
 - c. Documentation of the fact that the change has been reviewed by PORC and approved by the Manager of Operations (MOO).
2. Shall become effective upon review by PORC and approval by the Manager of Operations (MOO).

6.13 OFF-SITE DOSE CALCULATION MANUAL (ODCM)

An Off-Site Dose Calculation Manual shall contain the current methodology and parameters used in the calculation of off-site doses due to radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the environmental radiological monitoring program.

A. Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the semiannual Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. Sufficiently detailed information to support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s).
 - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations.

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c. Documentation of the fact that the change has been reviewed by PORC and approved by the Manager of Operations (MOO).

2. Shall become effective upon review by PORC and approved by the Manager of Operations (MOO).

6.14 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS, AND SOLID WASTE TREATMENT SYSTEMS*

Licensee-initiated major changes to the radioactive waste systems (liquid, gaseous, and solid):

A. Shall be reported to the Commission in the semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PORC. The discussion of each change shall contain:

1. A summary of the evaluation that led to the determination that the change could be made in accordance with 10CFR Part 50.59;
2. Sufficient detailed information to support the reason for the change without benefit of additional or supplemental information;
3. A detailed description of the equipment, components, and processes involved and the interfaces with other plant systems;
4. An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
5. An evaluation of the change, which shows the expected maximum exposures to member(s) of the public at the site boundary and to the general population that differ from those previously estimated in the license application and amendments thereto;
6. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;

* Licensee may choose to submit the information called for in this Specification as part of the annual FSAR update.

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7. An estimate of the exposure to plant operating personnel as a result of the change; and
 8. Documentation of the fact that the change was reviewed and found acceptable by PORC.
- B. Shall become effective upon review and acceptance by PORC and approval by the Plant Manager.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 95 TO FACILITY OPERATING LICENSE NO. DPR-28
VERMONT YANKEE NUCLEAR POWER STATION
VERMONT YANKEE NUCLEAR POWER CORPORATION
DOCKET NO. 50-271

1.0 INTRODUCTION

NRC Generic Letter 83-43, dated December 19, 1983, discussed revisions to notification and reporting requirements in 10 CFR 50.72 and Part 50.73 and suggested that licensees revise technical specifications to be consistent with the new requirements. By letter dated March 4, 1985, Vermont Yankee Nuclear Power Corporation (the licensee) requested an amendment to the Technical Specifications, Appendix A, Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station to accomplish these revisions. Also, the requested amendment involves changes to reduce the amount of information presently provided in Monthly Operating Reports, to clarify the bases of Minimum Critical Power Ratio (MCPR) requirements, and to correct editorial errors associated with Amendment 83 Radiological Effluent Technical Specifications.

2.0 EVALUATION

The present event reporting requirements of 10 CFR 50.73 render the reporting requirements of the Technical Specifications either unnecessary or conflicting. The proposed changes revise the definition and administrative control sections to eliminate these inconsistencies with 10 CFR 50.73. Based on telephone clarification, the licensee proposes to retain the term "reportable occurrence" instead of changing to "reportable event" as suggested in Generic Letter 83-43 to prevent numerous, needless changes to plant procedures. Other Technical Specifications were changed to be consistent with this definition. The reporting changes, which meet the intent of Generic Letter 83-43, are acceptable.

The proposed amendment revises the administrative requirements for the Monthly Operating Report to rename it the Monthly Statistical Report and to delete the reporting of major safety-related maintenance activities.

The reporting of safety related maintenance activities facilitates staff scrutiny of these activities, thereby providing a second independent determination that pertinent safety issues are considered. The safety valve of this process exists if the activities are not only reported, but also if the report is reviewed by the staff. It is possible that deleting the requirement for monthly reporting of safety-related maintenance activities may result in some increase in the probability or

consequence of an accident. We have considered the frequency with which independent staff review occurs for safety related maintenance activities which have been reported, and also the frequency with which previously unidentified safety issues are identified by the staff. Based on this we have determined that staff review of these reports is not an effective use of resources.

Because the reports would not be reviewed by the staff, we conclude that there would be no increase in the probability or consequences of an accident that would result from removing the reporting requirements.

The deletion of maintenance reporting is based on the lack of any regulatory requirement and the alternative means of maintenance information reporting, e.g., Nuclear Plant Reliability Data System (NPRDS) and Licensee Event Reports (LERs). The revision of the Monthly Operating Report is acceptable.

The proposed change to the MCPR bases is to clarify the relationship between the MCPR operating limits and the Core Performance Analyses Report. The clarification of the MCPR bases is acceptable.

Paragraph 4.8.D.1 was issued by Amendment 83 as part of the Radiological Effluent Technical Specifications (RETS), but the word "or" was inadvertently added to the sampling frequency for liquid holdup tanks. Based on telephone discussions the licensee agreed to revise the frequency requirement to clearly specify the intended frequency, i.e., within one week following additions to the tanks and one sample able to cover multiple additions. The editorial change to liquid holdup tank sampling frequency is acceptable.

We have evaluated the proposed changes to the Technical Specifications and conclude that these changes are administrative and do not involve any physical change to the plant's safety-related structures, systems or components. Further, these changes do not increase the likelihood of a malfunction of safety-related equipment, or increase the consequences of an accident previously analyzed or create the possibility of a malfunction different from those previously evaluated. Therefore, we find the licensee's requested changes to be acceptable.

3.0 ENVIRONMENTAL CONSIDERATIONS

This amendment involves only changes in administrative procedures and requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: G. Meyer

Dated: August 11, 1986