

Mr. Robert J. Wanczyk
 Acting Director of Operations
 Vermont Yankee Nuclear Power Corporation
 185 Old Ferry Road
 Brattleboro, VT 05301

July 19, 1999

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION - ISSUANCE OF
 AMENDMENT RE: ADMINISTRATIVE CONTROLS (TAC NO. MA4660)

Dear Mr. Wanczyk:

The Commission has issued the enclosed Amendment No. 171 to Facility Operating License No. DPR-28, for the Vermont Yankee Nuclear Power Station in response to your application dated February 1, 1999, as supplemented on April 19 and 23, 1999. The amendment changes the Technical Specifications to replace Section 6.0 regarding administrative controls.

Your original submittal dated February 1, 1999, contained several proposed changes that were not acceptable to the staff. These dealt primarily with the proposed relocation of quality assurance requirements to the Technical Requirements Manual. Guidance provided in Administrative Letter 95-06 "Relocation of Technical Specifications Administrative Controls Related to Quality Assurance," clearly indicated that these requirements may be relocated to the quality assurance manual as we consider the requirements of 10 CFR 50.54(a) adequate to control future changes. In order to conduct timely review of submittals, we expect that licensees review current staff positions, such as that provided by Administrative Letter 95-06, and make proposals consistent with the NRC staff's position or provide extensive justification for the proposed change. The submittal was subsequently modified following discussions between the NRC and your staff.

A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by:

Richard P. Croteau, Project Manager, Section 2
 Project Directorate I
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures: 1. Amendment No.171 to License No. DPR-28
 2. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 19, 1999

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Acting Director of Operations
Vermont Yankee Nuclear Power Corporation
185 Old Ferry Road
Brattleboro, VT 05301

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Sincerely,

A handwritten signature in black ink that reads "Bartholomew C. Buckley for".

Richard P. Croteau, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures: 1. Amendment No. 171 to License No. DPR-28
2. Safety Evaluation

cc w/encls: See next page

Vermont Yankee Nuclear Power Station

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

VERMONT YANKEE NUCLEAR POWER CORPORATION

DOCKET NO. 50-271

VERMONT YANKEE NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 171
License No. DPR-28

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by the Vermont Yankee Nuclear Power Corporation (the licensee) dated February 1, 1999, as supplemented on April 19 and 23, 1999, 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.

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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-28 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No.171, 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 its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: July 19, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 171

FACILITY OPERATING LICENSE NO. DPR-28

DOCKET NO. 50-271

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>	<u>Remove</u>	<u>Insert</u>
i	i	265	265
5	5	266	266
55	55	267	267
145a	145a	268	---
182	182	269	---
184	184	270	---
191	191	270a	---
192	192	271	---
201	201	272	---
208	208	273	---
227	227	274	---
255	255	275	---
256	256	276	---
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1.0 DEFINITIONS

factors used for this calculation shall be those listed in NRC Regulatory Guide 1.109, Revision 1, October 1977.

- DD. Solidification - Solidification shall be the conversion of wet wastes into a form that meets shipping and burial ground requirements. Suitable forms include dewatered resins and filter sludges.
- EE. Deleted
- FF. Site Boundary - The site boundary is shown in Figure 2.2-5 in the FSAR.
- GG. Deleted
- HH. Deleted
- II. Off-Site Dose Calculation Manual (ODCM) - A manual containing 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 conduction of the environmental radiological monitoring program.
- JJ. 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.
- KK. Gaseous Radwaste Treatment System - The Augmented Off-Gas System (AOG) is the gaseous radwaste treatment system which has been designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system off-gases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.
- LL. Ventilation Exhaust Treatment System - The Radwaste Building and AOG Building ventilation HEPA filters are ventilation exhaust treatment systems which have been designed and installed to reduce radioactive material in particulate form in gaseous effluents by passing ventilation air through HEPA filters for the purpose of removing radioactive particulates from the gaseous exhaust stream prior to release to the environment. Engineered safety feature atmospheric cleanup systems, such as the Standby Gas Treatment (SBGT) System, are not considered to be ventilation exhaust treatment system components.
- MM. Vent/Purging - Vent/Purging is the controlled process of discharging air or gas from the primary containment to control temperature, pressure, humidity, concentration or other operating conditions.
- NN. Core Operating Limits Report - The Core Operating Limits Report is the unit-specific document that provides core operating limits for the current operating reload cycle. These cycle-specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.6.C. Plant operation within these operating limits is addressed in individual specifications.

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TABLE 3.2.6 NOTES

- Note 1 - From and after the date that a parameter is reduced to one indication, operation is permissible for 30 days. If a parameter is not indicated in the Control Room, continued operation is permissible during the next seven days. If indication cannot be restored within the next six hours, an orderly shutdown shall be initiated and the reactor shall be in a hot shutdown condition in six hours and a cold shutdown condition in the following 18 hours.
- Note 2 - Deleted.
- Note 3 - From and after the date that this parameter is reduced to one indication in the Control Room, continued reactor operation is permissible during the next 30 days. If both channels are inoperable and indication cannot be restored in six hours, an orderly shutdown shall be initiated and the reactor shall be in a hot shutdown condition in six hours and a cold shutdown condition in the following 18 hours.
- Note 4 - From and after the date that safety/relief valve position from pressure switches is unavailable, reactor operation may continue provided safety/relief valve position can be determined from Recorder #2-166 (steam temperature in SRVs, 0-600°F) and Meter 16-19-33A or C (torus water temperature, 0-250°F). If both parameters are not available, the reactor shall be in a hot shutdown condition in six hours and a cold shutdown condition in the following 18 hours.
- Note 5 - From and after the date that safety valve position from the acoustic monitor is unavailable, reactor operation may continue provided safety valve position can be determined from Recorder #2-166 (thermocouple, 0-600°F) and Meter #16-19-12A or B (containment pressure (-15) - (+260) psig). If both indications are not available, the reactor shall be in a hot shutdown condition in six hours and in a cold shutdown condition in the following 18 hours.
- Note 6 - Within 30 days following the loss of one indication, or seven days following the loss of both indications, restore the inoperable channel(s) to an operable status or a special report to the Commission must be prepared and submitted within the subsequent 14 days, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status.
- Note 7 - From and after the date that this parameter is unavailable by Control Room indication, within 72 hours ensure that local sampling capability is available. If the Control Room indication is not restored within 7 days, prepare and submit a special report to the NRC within 14 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status.

BASES: 3.6 and 4.6 (Cont'd)

J. Thermal Hydraulic Stability

The reactor design criteria is such that thermal hydraulic oscillations are prevented or can be readily detected and suppressed without exceeding specified fuel design limits. To minimize the likelihood of an instability, a power/flow exclusion region to be avoided during normal operation is calculated using the approved methodology as stated in Specification 6.6.C. Since the exclusion region may change each fuel cycle, the limits are contained in the Core Operating Limits Report. Specific directions are provided to avoid operation in this region and to immediately exit upon an entry. Entries into the exclusion region are not part of normal operation. An entry may occur as a result of an abnormal event, such as a single recirculation pump trip. In these events, operation in the exclusion region may be needed to prevent equipment damage, but actual time spent inside the exclusion region is minimized. Though each operator action can prevent the occurrence and protect the reactor from an instability, the APRM flow-biased scram function is designed to suppress global oscillations, the most likely mode of oscillation, prior to exceeding the fuel safety limit. While global oscillations are the most likely mode, protection from out-of-phase oscillations are provided through avoidance of the exclusion region and administrative controls on reactor conditions which are primary factors affecting reactor stability:

TABLE 4.8.1 NOTATION: (Cont'd)

- c. A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen which is representative of the liquids released. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.
- d. The principal gamma emitters for which the LLD specification will apply are exclusively the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144. This list does not mean that only these nuclides are to be detected and reported. Other peaks which are measurable and identifiable, together with the above nuclides, shall also be identified and reported. Nuclides which are below the LLD for the analyses should not be reported as being present at the LLD level, but as "not detected". When unusual circumstances result in LLDs higher than required, the reasons shall be documented in the Radioactive Effluent Release Report.

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TABLE 4.8.2 NOTATION:

- a. See footnote a. of Table 4.8.1.
- b. Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after removal from samplers. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or thermal power change exceeding 25% of rated thermal power in one hour, and analyses shall be completed within 48 hours of changing the samples. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement to sample at least once per 24 hours for 7 days applies only if: (1) analysis shows that the dose equivalent I-131 concentration in the primary coolant has increased more than a factor of 3 and the resultant concentration is at least 1×10^{-1} $\mu\text{Ci/ml}$; and (2) the noble gas monitor shows that effluent activity has increased more than a factor of 3.
- c. Sampling and analyses shall also be performed following shutdown, startup, or a thermal power change exceeding 25% of rated thermal power per hour unless: (a) analysis shows that the dose equivalent I-131 concentration in the primary coolant has not increased more than a factor of 3 and the resultant concentration is at least 1×10^{-1} $\mu\text{Ci/ml}$; and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.
- d. The principal gamma emitters for which the LLD specification will apply are exclusively the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135 and Xe-138 for gaseous emissions, and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks which are measurable and identifiable, together with the above nuclides, shall also be identified and reported. Nuclides which are below LLD for the analyses should not be reported as being present at the LLD level for that nuclide, but as "not detected". When unusual circumstances result in LLDs higher than required, the reasons shall be documented in the Radioactive Effluent Release Report.
- e. The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.8.E.1, 3.8.F.1 and 3.8.G.1.
- f. The gaseous waste sampling and analysis program does not explicitly require sampling and analysis at a specified LLD to determine the I-133 release. Estimates of I-133 releases shall be determined by counting the weekly charcoal sample for I-133 (as well as I-131) and assume a constant release rate for the release period.
- g. Lower Limit of Detection (LLD) applies only to particulate form radionuclides identified in Table Notation d. above.

3.9 LIMITING CONDITIONS FOR OPERATION

C. Radiological Environmental Monitoring Program

1. The radiological environmental monitoring program shall be conducted as specified in Table 3.9.3.

D. Land Use Census

1. A land use census shall be conducted to identify the location of the nearest milk animal and the nearest residence in each of the 16 meteorological sectors within a distance of five miles. The survey shall also identify the nearest milk animal (within 3 miles of the plant) to the point of predicted highest annual average D/Q value in each of the three major meteorological sectors due to elevated releases from the plant stack.
2. With a land use census identifying one or more locations which yield a calculated dose or dose commitment (via the same exposure pathway) at least 20 percent greater than at a location from which samples are currently being obtained in accordance with Specification 3.9.C.1, add the new location(s) to the radiological environmental monitoring program within 30 days if permission from the owner to collect samples can be obtained, and sufficient sample volume is available. The sampling location(s), excluding the control

4.9 SURVEILLANCE REQUIREMENTS

C. Radiological Environmental Monitoring Program

1. The radiological environmental monitoring samples shall be collected pursuant to Table 3.9.3 from the locations given in the ODCM and shall be analyzed pursuant to the requirements of Table 3.9.3 and the detection capabilities required by Table 4.9.3.

D. Land Use Census

1. The land use census shall be conducted at least once per year between the dates of June 1 and October 1 by either a door-to-door survey, aerial survey, or by consulting local agricultural authorities. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.6.E.

3.9 LIMITING CONDITIONS FOR OPERATION

station location, having the lowest calculated dose or dose commitment (via the same exposure pathway) may be deleted from this monitoring program after October 31 of the year in which this land use census was conducted.

E. Intercomparison Program

1. Analyses shall be performed on referenced radioactive materials supplied as part of an Intercomparison Program which has been approved by NRC.

4.9 SURVEILLANCE REQUIREMENTS

E. Intercomparison Program

1. A summary of the results of analyses performed as part of the above required Intercomparison Program shall be included in the Annual Radiological Environmental Operating Report. The identification of the NRC approved Intercomparison Program which is being participated in shall be stated in the ODCM.

TABLE 3.9.3 NOTATION

- a Specific parameters of distance and direction sector from the centerline of the reactor and additional descriptions where pertinent, shall be provided for each and every sample location in Table 3.9.3 in a table and figure(s) in the ODCM. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every reasonable effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Specification 6.6.E. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances, suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the radiological environmental monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.6.D, identify the cause of the unavailability of samples for that pathway and identify the new location(s) for obtaining replacement samples in the next Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).
- b One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a Thermoluminescent Dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. The 40 stations is not an absolute number. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used and should be selected to obtain optimum dose information with minimal fading.
- c Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than ten times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.
- d Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.
- e The "upstream sample" shall be taken at a distance beyond significant influence of the discharge. The "downstream" sample shall be taken in an area beyond but near the mixing zone.
- f Composite sample aliquots shall be collected at time intervals that are very short (e.g., hourly) relative to the compositing period (e.g., monthly) in order to assure obtaining a representative sample.
- g Each meteorological sector shall have an established "inner" and an "outer" monitoring location based on ease of recovery (i.e., response time) and year-round accessibility.
- h Sample collection will be performed weekly whenever the main plant stack effluent release rate of I-131, as determined by the sampling and analysis program of Table 4.8.2, is equal to or greater than 1×10^{-1} uCi/sec. Sample collection will revert back to semimonthly no sooner than at least two weeks after the plant stack effluent release rate of I-131 falls and remains below 1×10^{-1} uCi/sec.

TABLE 4.9.3 NOTATION

- (a) See Footnote (a) of Table 4.8.1.
- (b) Parent only.
- (c) If the measured concentration minus the 5 sigma counting statistics is found to exceed the specified LLD, the sample does not have to be analyzed to meet the specified LLD.
- (d) This list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the listed nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report pursuant to Specification 6.6.E.
- (e) The Ba-140 LLD and concentration can be determined by the analysis of its short-lived daughter product La-140 subsequent to an 8 day period following collection. The calculation shall be predicted on the normal ingrowth equations for a parent-daughter situation and the assumption that any unsupported La-140 in the sample would have decayed to an insignificant amount (at least 3.6 percent of its original value). The ingrowth equations will assume that the supported La-140 activity at the time of the collection is zero.
- (f) Nuclides which are below the LLD for the analyses should not be reported as being present at the LLD, but as "not detected". For purposes of averaging, the LLD will be assumed to be zero.

BASES:

3.11 FUEL RODS

A. Average Planar Linear Heat Generation Rate (APLHGR)

Refer to the appropriate topical reports listed in Specification 6.6.C for analyses methods.

(Note: All exposure increments in this Technical Specification section are expressed in terms of megawatt-days per short ton.)

The MAPLHGR reduction factor for single recirculation loop operation is based on the assumption that the coastdown flow from the unbroken recirculation loop would not be available during a postulated large break in the active recirculation loop. See Core Operating Limits Report for the cycle-specific reduction factor.

B. Linear Heat Generation Rate (LHGR)

Refer to the appropriate topical reports listed in Specification 6.6.C for analyses methods.

C. 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 Supplemental Reload Licensing Report. Refer to the appropriate topical reports listed in Specification 6.6.C for analysis methods. The increase in MCPR operating limits for single loop operation accounts for increased core flow measurement and TIP reading uncertainties.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- A. The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during absences.
- B. The Plant Manager or designee shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect nuclear safety.
- C. The Shift Supervisor shall be responsible for the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in plant startup or normal operation, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in cold shutdown or refueling with fuel in the reactor, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

6.2 ORGANIZATION

A. Onsite and Offsite Organizations

Organizations shall be established for unit operation and corporate management. These organizations shall include the positions for activities affecting safety of the nuclear power plant.

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organizational positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Vermont Yankee Operational Quality Assurance Manual.
2. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those on-site activities necessary for safe operation and maintenance of the plant.
3. The corporate executive with direct responsibility for the plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

6.2 ORGANIZATION (Cont'd)

4. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate on-site manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

B. Unit Staff

The unit staff organization shall include the following:

1. A non-licensed operator shall be assigned when the reactor contains fuel and an additional non-licensed operator shall be assigned during Plant Startup and Normal Operation.
2. At least one licensed Reactor Operator (RO) or one licensed Senior Reactor Operator (SRO) shall be present in the control room when fuel is in the reactor.
3. When the unit is in Plant Startup or Normal Operation, at least one licensed Senior Reactor Operator (SRO) and one licensed Reactor Operator (RO), or two licensed Senior Reactor Operators, shall be present in the control room.
4. Shift crew composition shall meet the requirements stipulated herein and in 10 CFR 50.54(m). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 6.2.B.1 and 6.2.B.8 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
5. An individual qualified in radiation protection procedures shall be present on-site when there is fuel in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
6. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, radiation protection technicians, auxiliary operators, and key maintenance personnel).
7. The operations manager or an assistant operations manager shall hold an SRO license.
8. While the unit is in Plant Startup or Normal Operation, the Shift Engineer shall provide advisory technical support to the Shift Supervisor (SS).

6.2 ORGANIZATION (Cont'd)C. Unit Staff Qualifications

Each member of the unit staff shall meet or exceed the minimum qualifications of the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants," except for the radiation protection manager who shall meet the qualifications of Regulatory Guide 1.8, Revision 1 (September 1975) and the Shift Engineer, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED

Applies to administrative action to be followed in the event a safety limit is exceeded.

If a safety limit is exceeded, the reactor shall be shutdown immediately.

6.4 PROCEDURES

Written procedures shall be established, implemented, and maintained covering the following activities:

- A. Normal startup, operation and shutdown of systems and components of the facility.
- B. Refueling operations.
- C. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, suspected Primary System leaks and abnormal reactivity changes.
- D. Emergency conditions involving potential or actual release of radioactivity.
- E. Preventive and corrective maintenance operations which could have an effect on the safety of the reactor.
- F. Surveillance and testing requirements.
- G. Fire protection program implementation.
- H. Process Control Program in-plant implementation.
- I. Off-Site Dose Calculation Manual in-plant implementation.

6.5 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraphs 20.1601(a) and 20.1601(b) of 10 CFR 20:

- A. Paragraph 20.1601, "Control of Access to High Radiation Areas. In lieu of the "control device" or "alarm signal" required by Paragraph 20.1601(a), each high radiation area in which the intensity of radiation is greater than 100 mrem/hr at 30 cm, but less than 1000 mrem/hr at 30 cm, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Radiation Protection personnel qualified in radiation protection procedures (e.g., radiation protection technicians) may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
 3. A Radiation Protection individual qualified in radiation protection procedures (e.g., radiation protection technicians) with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and who will perform direct or remote (such as closed circuit TV cameras) periodic radiation surveillance at the frequency specified in the RWP. The surveillance frequency will be established by the Radiation Protection Manager.
- B. The above procedure shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr at 30 cm, but less than 500 rad/hr at 1 meter. In addition, locked or continuously guarded entryways shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Radiation Protection Manager.

6.6 REPORTING REQUIREMENTS

The following reports shall be submitted in accordance with 10 CFR 50.4.

A. Occupational Radiation Exposure Report

An annual report covering the previous calendar year shall be submitted prior to April 30 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 Self-Reading Dosimeter (SRD), 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 should be assigned to specific major work functions.

B. Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis 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.

C. Core Operating Limits Report

The core operating limits shall be established and documented in the Core Operating Limits Report (COLR) before each reload cycle or any remaining part of a reload cycle for the following:

1. The Average Planar Linear Heat Generation Rates (APLHGR) for Specifications 3.11.A and 3.6.G.1a,
2. The K_f core flow adjustment factor for Specification 3.11.C.,
3. The Minimum Critical Power Ratio (MCPR) for Specifications 3.11.C and 3.6.G.1a,
4. The Linear Heat Generation Rates (LHGR) for Specifications 2.1.A.1a, 2.1.B.1, and 3.11.B, and
5. The Power/Flow Exclusion Region for Specifications 3.6.J.1a and 3.6.J.1b.

The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

Report, E. E. Pilat, "Methods for the Analysis of Boiling Water Reactors Lattice Physics," YAEC-1232, December 1980 (Approved by NRC SER, dated September 15, 1982).

¹/ This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.

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Report, D. M. VerPlanck, "Methods for the Analysis of Boiling Water Reactors Steady State Core Physics," YAEC-1238, March 1981 (Approved by NRC, SER, dated September 15, 1982).

Report, J. M. Holzer, "Methods for the Analysis of Boiling Water Reactors Transient Core Physics," YAEC-1239P, August 1981 (Approved by NRC SER, dated September 15, 1982).

Report, S. P. Schultz and K. E. St. John, "Methods for the Analysis of Guide Fuel Rod Steady-State Thermal Effects (FROSSTEY): Code/Model Description Manual," YAEC-1249P, April 1981 (Approved by NRC SER, dated September 27, 1985).

Report, A. A. F. Ansari, "Methods for the Analysis of Boiling Water Reactors: Steady-State Core Flow Distribution Code (FIBWR)," YAEC-1234, December 1980 (Approved by NRC SER, dated September 15, 1982).

Report, S. P. Schultz and K. E. St. John, "Methods for the Analysis of Oxide Fuel Rod Steady-State Thermal Effects (FROSSTEY): Code Qualification and Application," YAEC-1265P, June 1981 (Approved by NRC SER, dated September 27, 1985).

Report, A. A. F. Ansari and J. T. Cronin, "Methods for the Analysis of Boiling Water Reactors: A System Transient Analysis Model (RETRAN)," YAEC-1233, April 1981. (Approved by NRC SERs, dated November 27, 1981 and September 4, 1984).

Report, A. A. F. Ansari, K. J. Burns and D. K. Beller, "Methods for the Analysis of Boiling Water Reactors: Transient Critical Power Ratio Analysis (RETRAN-TCPYA01)," YAEC-1299P, March 1982 (Approved by NRC SER, dated September 15, 1982).

Report, A. S. DiGiovine, et al., "CASMO-3G Validation," YAEC-1363-A, April 1988.

Report, A. S. DiGiovine, J. P. Gorski, and M. A. Tremblay, "SIMULATE-3 Validation and Verification," YAEC-1659-A, September 1988.

Report, R. A. Woehlke, et al., "MICBURN-3/CASMO-3/TABLES-3/SIMULATE-3 Benchmarking of Vermont Yankee Cycles 9 through 13," YAEC-1683-A, March 1989.

Report, J. T. Cronin, "Method for Generation of One-Dimensional Kinetics Data for RETRAN-02," YAEC-1694-A, June 1989.

Report, V. Chandola, M. P. LeFrancois, and J. D. Robichaud, "Application of One-Dimensional Kinetics to Boiling Water Reactor Transient Analysis Methods," YAEC-1693-A, Revision 1, November 1989.

Report, L. H. Steves, et. al, "HUXY: A Generalized Multirod Heatup Code with 10CFR50, Appendix K Heatup Option: User's Manual," XN-CC-33(A), Revision 1, dated November 14, 1975 (Approved by NRC SER, dated March 6, 1975).

Report, "RELAP5YA, A Computer Program for Light-Water Reactor System Thermal-Hydraulic Analysis," YAEC-1300P, October 1982 (Approved by NRC SERs, dated August 25, 1987 and October 21, 1992).

Report, R. T. Fernandez and H. C. daSilva, Jr., "Vermont Yankee BWR Loss-of-Coolant Accident Licensing Analysis Method," YAEC-1547, June 1986 (Approved by NRC SER, dated October 21, 1992).

Letter from R. W. Capstick (VYNPC) to USNRC, "HUXY Computer Code Information for the Vermont Yankee BWR LOCA Licensing Analysis Method," FVY 87-63, dated June 4, 1987 (Approved by NRC SER, dated February 27, 1991).

Letter from R. W. Capstick (VYNPC) to USNRC, "Request for Supplemental Safety Evaluation Report Supporting the Use of RELAP5YA for Vermont Yankee Nuclear Power Station," FVY 88-006, dated January 26, 1988 (Approved by NRC SERs, dated February 27, 1991 and October 21, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Supplementary Information Regarding NRC LOCA Analysis Review Effort," BVY 89-91, dated October 6, 1989 (Approved by NRC SER, dated October 21, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Supplementary Information Regarding NRC LOCA Analyses Review Effort," BVY 90-028, dated March 9, 1990 (Approved by NRC SER, dated October 21, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Second Request for Additional Information on the Use of RELAP5YA," BVY 90-067, dated June 8, 1990 (Approved by NRC SER, dated February 27, 1991).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Request for Additional Information on the Use of RELAP5YA," BVY 90-087, dated August 28, 1990 (Approved by NRC SER, dated October 21, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Second Request for Additional Information on the Use of RELAP5YA," BVY 91-05, dated January 9, 1991 (Approved by NRC SER, dated October 21, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Third Request for Additional Information on the Use of RELAP5YA," BVY 91-41, dated April 19, 1991 (Approved by NRC SER, dated October 21, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Supplementary Information Regarding the Use of RELAP5YA," BVY 92-12, dated February 7, 1992 (Approved by NRC SER, dated October 21, 1992).

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Letter from R. W. Capstick (VYNPC) to USNRC, "Vermont Yankee LOCA Analysis Method FROSSTEY Fuel Performance Code (FROSSTEY-2)," FVY 87-116, dated December 16, 1987 (Approved by NRC SER, dated September 24, 1992).

Letter from R. W. Capstick (VYNPC) to USNRC, "Response to NRC Request for Additional Information on the FROSSTEY-2 Fuel Performance Code," BVY 89-65, dated July 14, 1989 (Approved by NRC SER, dated September 24, 1992).

Letter from R. W. Capstick (VYNPC) to USNRC, "Supplemental Information on the FROSSTEY-2 Fuel Performance Code," BVY 89-74, dated August 4, 1989 (Approved by NRC SER, dated September 24, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Responses to Request for Additional Information on FROSSTEY-2 Fuel Performance Code," BVY 90-045, dated April 19, 1990 (Approved by NRC SER, dated September 24, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Supplemental Information to VYNPC April 19, 1990 Response Regarding FROSSTEY-2 Fuel Performance Code," BVY 90-054, dated May 10, 1990 (Approved by NRC SER, dated September 24, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Responses to Request for Additional Information on FROSSTEY-2 Fuel Performance Code," BVY 91-024, dated March 6, 1991 (Approved by NRC SER, dated September 24, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "LOCA-Related Responses to Open Issues on FROSSTEY-2 Fuel Performance Code," BVY 92-39, dated March 27, 1992 (Approved by NRC SER, dated September 24, 1992).

Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "FROSSTEY-2 Fuel Performance Code - Vermont Yankee Response to Remaining Concerns," BVY 92-54, dated May 15, 1992 (Approved by NRC SER, dated September 24, 1992).

Report, "Loss-of-Coolant Accident Analysis for Vermont Yankee Nuclear Power Station," NEDO-21697, August 1977, as amended (Approved by NRC SER, dated November 30, 1977).

Report, "General Electric Standard Application for Reactor Fuel (GESTARII)," NEDE-24011-P-A, GE Company Proprietary (the latest NRC-approved version will be listed in the COLR).

Report, General Electric Nuclear Energy, "BWR Owner's Group Long-Term Solutions Licensing Methodology," NEDO-31960, June 1991 (Approved by NRC SER, dated July 12, 1993).

Report, General Electric Nuclear Energy, "BWR Owner's Group Long-Term Solutions Licensing Methodology," NEDO-31960, Supplement 1, March 1992 (Approved by NRC SER, dated July 12, 1993).

Report, N. Fujita, et al., "Method for Power/Flow Exclusion Region Calculation Using the LAPUR5 Computer Code," YAEC-1926-A (Approved by NRC SER, dated November 5, 1996).

Report, Yankee Atomic Electric Company, "Application of the FIBWR2 Core Hydraulics Code to BWR Reload Analysis," YAEC-1339-A, January 31, 1997.

The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The COLR, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC.

D. Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted by May 15 of each year and in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM) and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

E. Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating 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.

6.7 PROGRAMS AND MANUALS

The following programs shall be established, implemented and maintained:

A. 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

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implemented. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements.
2. 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.

B. 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 for the purpose of demonstrating compliance with 10 CFR 50, Appendix I, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the environmental radiological monitoring program.

The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Radioactive Effluent Release Report and the Annual Radiological Environmental Operating Report required by Specification 6.6.D and Specification 6.6.E, respectively.

1. Licensee initiated changes to the ODCM:
 - a. Shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - i. Sufficient information to support the change together with appropriate analyses, or evaluations justifying the change(s) and
 - ii. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, and do not adversely impact the accuracy or reliability of effluent dose or setpoint calculations.
 - b. Shall become effective upon review by PORC and approved by the Plant Manager.
 - c. Shall be submitted to the Commission in the form of a legible copy of the affected pages of the ODCM as a part of or concurrent with the Radioactive Effluent Release

Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

C. PRIMARY CONTAINMENT LEAK RATE TESTING PROGRAM

A program shall be established to implement the leak rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, entitled "Performance Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 44 psig.

The maximum allowable primary containment leak rate, L_a , at P_a , shall be 0.8% of primary containment air weight per day.

Leak rate acceptance criteria are:

1. Primary containment leak rate acceptance criterion $\leq 1.0 L_a$.
2. The as-left primary containment integrated leak rate test (Type A test) acceptance criterion is $\leq 0.75 L_a$.
3. The combined local leak rate test (Type B and C tests) acceptance criterion is $\leq 0.60 L_a$, calculated on a maximum pathway basis, prior to entering a mode of operation where containment integrity is required.
4. The combined local leak rate test (Type B and C tests) acceptance criterion is $\leq 0.60 L_a$, calculated on a minimum pathway basis, at all times when primary containment integrity is required.
5. Airlock overall leak rate acceptance criterion is $\leq 0.10 L_a$ when tested at $\geq P_a$.

The provision of the Definition (1.0.Y) for Surveillance Frequency does not apply to the test frequencies specified in the Primary Containment Leak Rate Testing Program.

D. Radioactive Effluent Controls Program

This program conforming to 10 CFR 50.36a provides for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably

achievable. The program shall be contained in the ODCM, shall be implemented by operating procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents from the site to unrestricted areas, conforming to 10 times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001 - 20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents pursuant to 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2 percent of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be limited to the following:
 1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
 2. For iodine-131, iodine-133, tritium, and for all radionuclides in particulate form with half lives greater than 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ;

- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the unit to areas at or beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents released from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 171 TO FACILITY OPERATING LICENSE NO. DPR-28

VERMONT YANKEE NUCLEAR POWER CORPORATION

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

1.0 INTRODUCTION

The Vermont Yankee Nuclear Power Station is a boiling water reactor (BWR), model BWR-4, with a Mark I containment. By letter dated February 1, 1999, as supplemented on April 19 and April 23, 1999, the Vermont Yankee Nuclear Power Corporation, the licensee for the Vermont Yankee Nuclear Power Station, submitted for U. S. Nuclear Regulatory Commission (NRC or the Commission) staff's review a proposed change to the technical specifications (TS). The licensee proposed to modify Section 6.0 including removing or relocating requirements that are adequately controlled by existing regulations other than 10 CFR 50.36 and the TS. Administrative changes to certain other sections of the TSs were also proposed to conform to the changes resulting from the re-write of Section 6.0.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act of 1954, as amended (the Act) requires applicants for nuclear power plant operating licenses to include the TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in 10 CFR 50.36. That regulation requires that the TS include items in eight specific categories. The categories are (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; (5) administrative controls; (6) decommissioning; (7) initial notification; and (8) written reports. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

The Commission amended 10 CFR 50.36 (60 FR 36593, July 19, 1995), and codified four criteria to be used in determining whether a particular matter is required to be included in a limiting condition for operation (LCO), as follows: (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a design-basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design-basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; or (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. LCOs and related requirements that fall within or satisfy any of the

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criteria in the regulation must be retained in the TS, while those requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. While the criteria specifically apply to LCOs, in adopting the revision to the Rule the Commission noted that the staff had used the intent of these criteria to identify the optimum set of administrative controls in the TS (60 FR 36957).

The regulation at 10 CFR 50.36 states that Administrative Controls "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the Administrative Controls section of the TS is, therefore, that information which the Commission deems essential for the safe operation of the facility which is not already adequately covered by other regulations. Accordingly, the staff has determined that requirements that are not specifically required under 10 CFR 50.36(c)(5), and that are not otherwise necessary for operation of the facility in a safe manner, can be removed from Section 6.0 Administrative Controls.

3.0 EVALUATION

The following discussions set forth in detail the staff's conclusions regarding the removal or relocation of selected administrative controls from the Vermont Yankee TS. The changes were reviewed in accordance with the guidance provided in, or planned for, the Standard Technical Specifications (STS), NUREG-1433. In addition, these changes were reviewed in accordance with the guidance provided in Administrative Letter 95-06 "Relocation of Technical Specifications Administrative Controls Related to Quality Assurance."

License amendment requests should describe the relocation of each selected requirement to a particular licensee-controlled document or program (e.g., the final safety analysis report (FSAR) or the quality assurance (QA) plan). The description should also address the submittal of the revised documents to the NRC in accordance with the applicable regulation (e.g., 10 CFR 50.71(e)). In the amendment request, the licensee should clearly describe the program it will use to control changes to relocated requirements (e.g., 10 CFR 50.59 or 50.54(a)). Control of the relocated requirements in accordance with the applicable regulation ensures that NRC review and approval will be proposed for changes exceeding the stated regulatory threshold (e.g., an unreviewed safety question or a reduction in commitment). Elimination of reporting requirements that are recommended for relocation or removal from the TS can be proposed if they are not required by 10 CFR 50.72, 10 CFR 50.73, or other regulations.

3.1 Table of Contents

The proposed changes to the Table of Contents reflect the changes to Section 6.0. These changes to the Table of Contents are administrative only and reflect the proposed changes discussed in this safety evaluation (SE). The changes do not change the technical requirements. Therefore, the proposed changes to the Table of Contents are acceptable to the staff.

3.2 Changes to TS other than Section 6.0

The licensee proposed numerous editorial changes to the TS outside of Section 6.0 which were necessary to reflect the proposed changes to Section 6.0 such as changing the title of the "Annual Radioactive Effluent Release Report" to the "Radioactive Effluent Release Report", changing the title of the "Annual Radiological Environmental Surveillance Report" to the "Annual Radiological Environmental Operating Report," and other editorial changes necessary to reflect the proposed change numbering and relocations. The staff considers these proposed changes to be acceptable since they are administrative only, do not change the technical requirements in the TS, and ensure consistency with the proposed changes to TS Section 6.0 which are discussed later in this evaluation.

3.3 Administrative Controls Section 6.0

The current TS provides a general description of the Administrative Controls and states that these controls shall be adhered to. The licensee proposed to delete this section since 10 CFR 50.36(c)(5) clearly and formally explains the purpose of the Administrative Controls section of the TS. The staff agrees that the description in 10 CFR 50.36(c)(5) is adequate and the information can be deleted from the TS. Therefore, this change is acceptable to the staff.

3.4 Responsibility Section 6.1

The current title of TS Section 6.1, "Organization," is being changed to "Responsibility." The first paragraph of the current TS Section 6.1 is revised to conform to the STS, with the following exceptions. The title "Plant Manager" is used instead of Plant Superintendent since it is the title currently in use at Vermont Yankee for the position with overall responsibility. These changes are administrative and are consistent with the licensee's organization; therefore, they are acceptable to the staff.

The second paragraph of Section 6.1, added in conformance with the STS, provides further description of the plant manager's responsibilities and is acceptable to the staff. The third paragraph of Section 6.1, added in conformance with the STS, specifies the responsibilities of the Shift Supervisor. These changes include relocation of requirements from the current TS Table 6.1.1 and addition of more restrictive requirements not in the current TS that appropriately describe the duties of these positions. Therefore, the proposed changes are acceptable to the staff. In addition, the proposed changes are consistent with NUREG-1433.

3.5 Organization - Onsite and Offsite Organizations

Current TS 6.1, "Organization," which includes the following sections:

- TS 6.1.A Lines of authority, responsibility, and communication
- TS 6.1.B Plant Manager responsibilities
- TS 6.1.C Manager of Operations responsibilities
- TS 6.1.D Conduct of Operations (plant staff requirements and qualifications)
- TS 6.1.E Fire Brigade requirements

is proposed to be renumbered TS 6.2, "Organization." Revised TS 6.2 consists of TS 6.2.A, "Onsite and Offsite Organization," TS 6.2.B, "Unit Staff", and TS 6.2.C "Unit Staff Qualifications," to conform with the organization of the STS.

Proposed TS 6.2.A conforms in content with the STS. The following changes from the current TS were proposed in developing TS 6.2.A.

The licensee proposed an administrative change to the current TS Section 6.1.A to reference the "Vermont" Yankee Operation Quality Assurance Manual (QA Manual) rather than the Yankee Operational Quality Assurance Manual due to a change in nomenclature. This does not represent a technical change; therefore, the proposed change is acceptable to the staff.

Succession requirements for the Plant Manager were moved from current TS 6.1.B to TS 6.1.A. This change is acceptable to the staff since the proposed TS 6.1.A adequately addresses the requirements in this area.

The licensee proposed to change the reference to the Manager of Operations in current TS 6.1.C to "corporate executive with direct responsibility for the plant." This replaces a specific title with a corporate position with the same corresponding responsibilities. Future changes in title for individuals in this position will therefore not necessitate a TS change. This change is acceptable to the staff since the proposed change adequately describes the position of the individual with these responsibilities.

Proposed TS 6.2.A.4 is a copy of current TS 6.1.D.8. with minor editorial changes that do not represent technical changes. Therefore, the proposed change is acceptable.

Proposed TS 6.2.B "Unit Staff" conforms in general content with the STS. The following changes from the current TS were proposed in developing TS 6.2.B.

Proposed TS 6.2.B.1 specifies the requirements for non-licensed operators. The designation of this individual was changed from "auxiliary operator" to "non-licensed operator" which is an equivalent title for the position. These requirements were moved from the current TS Table 6.1.1 with no change in meaning. Proposed TS 6.2.B.2 specifies the requirements for licensed reactor operators when fuel is in the reactor. This was moved from the current TS Table 6.1.1 with no change in meaning. Proposed TS 6.2.B.3 specifies the requirements for licensed operators in the control room during plant startup and normal operation. This was moved from the current TS Table 6.1.1 with no change in meaning. The staff finds these changes acceptable since they are movements of requirements within the TS with nomenclature, format, and wording changes which do not change the meaning of the TS.

Proposed TS 6.2.B.4 specifies the minimum shift staffing requirements and provides for the conditional short-term absence of shift personnel due to an unexpected absence. Title 10 of the Code of Federal Regulations (10 CFR) section 50.54(m) specifies the minimum shift staffing requirements and states that temporary deviations from the requirements shall be in accordance with the criteria established in the TS. The proposed TS allows for unexpected absence of on-duty shift crew members for up to 2 hours provided immediate action is taken to restore the shift crew composition to within the minimum requirements. The staff finds this

change to be acceptable since it is reasonable to allow for up to 2 hours for unexpected absences of shift personnel; and, this short absence will have slight or negligible impact on operation of the facility. In addition, the proposed change is consistent with NUREG-1433.

Proposed TS 6.2.B.5 specifies the requirements for an individual qualified in radiation protection procedures. This was moved from the current TS 6.1.D.1, which the staff finds acceptable, with the addition of a provision that allows for this position to be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position. The only potential impact of this addition is delayed entry into radiation areas to repair equipment. The staff finds this change to be acceptable since it is reasonable to allow this position to be vacant for up to 2 hours for unexpected absences and this short absence will have slight or negligible impact on the time equipment is out of service. In addition, the proposed change is consistent with NUREG-1433.

Proposed TS 6.2.B.6 specifies the requirements associated with limits on working hours of the staff. The licensee stated that this is an addition to the TS as the current TS does not specify any requirements in this area. The staff finds the proposed change to be acceptable since it provides reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operations.

Proposed TS 6.2.B.7 states that the operations manager or an assistant operations manager shall hold an SRO license. The staff considers that this requirement is equivalent to the requirements of the current TS 6.1.D.7, provides for an adequate level of operational knowledge to oversee the operations area, and is, therefore, acceptable.

Proposed TS 6.2.B.8 specifies requirements associated with the Shift Engineer. The licensee stated that this was relocated from the current TS Table 6.1.1 with clarification which does not modify any requirement. The staff considers the proposed change to be acceptable since it is a movement of requirements within the TS.

Proposed TS 6.2.C "Unit Staff Qualifications" conforms in general content with the STS. This proposed section replaces current TS sections 6.1.D.4, 6.1.D.5, and 6.1.D.6 with essentially the same requirements except for the listing of specific titles of plant personnel. The details of organizational titles have been relocated to the Technical Requirements Manual (TRM) which is incorporated by reference into the FSAR and subject to the provisions of 10 CFR 50.59. The staff finds the proposed changes to be acceptable since they constitute a movement of current requirements within the TS and those items relocated to the TRM are adequately controlled by the provisions of 10 CFR 50.59.

Other sections of current TS 6.1 and Table 6.1.1 were relocated to the TRM. The staff has reviewed these items and considers the proposed changes to be acceptable since 10 CFR 50.36 does not require these items to be controlled in the TS and control of changes by the provisions of 10 CFR 50.59 is adequate.

3.6 Review and Audit

The licensee proposed that the review and audit functions associated with the Plant Operations Review Committee (PORC) and Nuclear Safety Audit and Review Committee specified in

current TS 6.2 be relocated to the Vermont Yankee Operational Quality Assurance Manual (VOQAM). Future changes would be controlled by the requirements of 10 CFR 50.54(a). The staff indicated in Administrative Letter 95-06, "Relocation of Technical Specifications Administrative Controls Related to Quality Assurance," that relocation of these requirements to the QA plan was acceptable since the provisions of 10 CFR 50.54(a) provide adequate controls. The proposed change is acceptable to the staff since the provisions of 10 CFR 50.54(a) are adequate to control future changes and 10 CFR 50.36 does not require this information to be contained in the TS.

3.7 Reportable Occurrences

Current TS 6.3 specifies actions to be taken in the event of an occurrence in plant operation that requires reporting. The licensee proposed relocating these requirements to the TRM which is incorporated by reference into the FSAR and subject to the provisions of 10 CFR 50.59. The staff finds the proposed changes to be acceptable since the reporting requirements of 10 CFR 50.72 and 50.73 adequately specify reporting requirements and those items relocated to the TRM are adequately controlled by the provision of 10 CFR 50.59.

3.8 Exceeding Safety Limits

Current TS 6.4 specifies the actions to be taken if a safety limit is exceeded. The licensee proposed to relocate portions of TS 6.4 to the TRM. These portions of TS 6.4 are associated with prohibiting resumption of reactor operation until authorized by the NRC and internal (within the licensee's organization) reporting and analysis. Title 10 of the Code of Federal Regulations, section 50.36(c)(1)(i)(A) adequately specifies the requirements to be met if a safety limit is exceeded and the staff considers that it is not necessary to duplicate these requirements in the TS. Therefore, the proposed change is acceptable.

3.9 Procedures

The licensee proposed changing current TS 6.5, "Plant Operating Procedures," to TS 6.4, "Procedures." The title of the section and numbering changes proposed in this section do not change the technical requirements of the TS, and are therefore, acceptable to the staff. The following changes to this section were proposed.

The licensee proposed to replace the introductory section of current TS 6.5 to state "Written procedures shall be established, implemented, and maintained covering the following activities:." The staff considers this an administrative change which does not change the technical requirements, and therefore, considers the proposed change to be acceptable. In addition, this wording is consistent with the introductory section contained in NUREG-1433.

The licensee proposed to move and revise the requirements of current TS 6.5.B associated with radiation control standards to a new section 6.5, "High Radiation Area." This is discussed in the next section of this evaluation.

The licensee proposed relocating current TS 6.5.C, 6.5.D, and 6.5.E to the VOQAM. These sections involve procedures for review and approval of plant procedures and temporary

changes to procedures. Future changes would be controlled by the requirements of 10 CFR 50.54(a). The staff indicated in Administrative Letter 95-06 that relocation of these requirements to the QA plan was acceptable since the provisions of 10 CFR 50.54(a) provide adequate controls. The proposed change is acceptable to the staff since the provisions of 10 CFR 50.54(a) are adequate to control future changes and 10 CFR 50.36 does not require this information to be contained in the TS.

The licensee proposed relocating current TS 6.5.F specifying controls associated with licensed radioactive sealed sources to the TRM. The staff considers the proposed change to current TS 6.5.F to be acceptable since this information is not required to be included in the TS per 10 CFR 50.36 and the provisions of 10 CFR 50.59 provide adequate controls for these items.

3.10 High Radiation Area

The licensee proposed to move and revise the requirements of current TS 6.5.B associated with radiation control standards to a new section 6.5, "High Radiation Area." The new heading for proposed TS 6.5 and formatting/numbering changes do not change the technical meaning of the TS and are therefore acceptable to the staff. The following additional changes were proposed.

The licensee proposed to relocate the introductory paragraph of the current TS 6.5.B addressing radiation control standards and procedures to the VOQAM along with the requirements contained in current TS 6.5.B related to the radiation protection program. The staff finds this proposed change to be acceptable since: (1) 10 CFR 20.1101 adequately addresses radiation protection program requirements; (2) 10 CFR 50.36 does not require this information to be contained in the TS; and (3) the provisions of 10 CFR 50.54(a) provide adequate controls for these items.

The licensee proposed to add an introductory paragraph stating that "As provided in paragraph 20.1601(c) of 10 CFR 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraphs 20.1601(a) and 20.1601(b) of 10 CFR 20:." Title 10 of the Code of Federal Regulations (10 CFR) section 20.1601(c) allows for alternative methods for controlling access to high radiation areas. The proposed paragraph provides an introduction to the following sections which identify the alternative methods that are allowed. The proposed change is acceptable to the staff since it merely provides an introduction to the following sections and does not change the technical content of the TS.

The licensee proposed moving a footnote to current TS 6.5.B.1, involving health physics personnel requirements with regard to radiation work permit requirements, to the body of the TS (proposed TS section 6.5.A) making minor changes in wording which do not affect the technical requirements of the TS. The staff considers the proposed change to be acceptable since it does not change the technical content of the TS.

The licensee proposed to allow the use of remote monitoring (such as closed circuit TV cameras) for periodic radiation surveillance of activities addressed in current TS 6.5.B.1.c. Also proposed was changing TS 6.5.B.1 which requires "locked doors" to prevent unauthorized entry into high radiation areas to state "locked or continuously guarded entryways" may be used. The

staff considers these changes to be acceptable since they provide an adequate level of radiological control.

3.11 Plant Operating Records

The licensee proposed relocating current TS 6.6 regarding retention of plant operating records to the VOQAM. The licensee stated that the requirements for retention of records related to activities affecting quality are contained in 10 CFR Part 50, Appendix B, Criterion XVII and other sections of 10 CFR Part 50. Future changes would be controlled by the requirements of 10 CFR 50.54(a). The staff indicated in Administrative Letter 95-06 that relocation of these requirements to the QA plan was acceptable since the provisions of 10 CFR 50.54(a) provide adequate controls. The proposed change is acceptable to the staff since the provisions of 10 CFR 50.54(a) are adequate to control future changes and 10 CFR 50.36 does not require this information to be contained in the TS.

3.12 Reporting Requirements

Over the last several years, there were several initiatives to reduce unnecessary administrative burdens associated with reporting requirements, while retaining an appropriate level of publicly accessible information flow. The staff has concluded that many reports are unnecessary because the information is duplicated in other reports, such as reports specified by the Offsite Dose Calculation Manual, Radioactive Effluent Controls Program, and Radiological Environment Monitoring Program, or the reports are not required for the safe operation of the plant. In addition, the notification requirements in 10 CFR 50.72 and 50.73 for plant conditions that may be safety significant, or warrant emergency response, address these matters.

The licensee proposed changes to the current TS 6.7, "Reporting Requirements," which will become TS 6.6. Current TS 6.7 contains major report groups consisting of TS 6.7.A, "Routine Reports;" TS 6.7.B, "Reportable Occurrences;" and TS 6.7.C, "Unique Reporting Requirements." The licensee proposed removing these major report group headings since each individual report will be listed rather than group headings. The staff considers this and other editorial and numbering changes to this section to be acceptable since they do not change the technical content of the TS. The following additional changes were proposed.

The licensee proposed to change the introductory paragraph in current TS 6.7 to read "The following reports shall be submitted in accordance with 10 CFR 50.4." The current TS states that the reports shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted. This position no longer exists in the NRC. The staff considers the proposed change to be acceptable since 10 CFR 50.4, "Written Communications," adequately describes the requirements in this area. In addition the staff notes that this wording is consistent with NUREG-1433.

The licensee proposed relocating current TS 6.7.A.1 "Startup Report" to the TRM. The staff finds this proposed change to be acceptable since 10 CFR 50.36 does not require this information to be contained in the TS and the provisions of 10 CFR 50.59 provide adequate controls for this item.

The licensee proposed changing the title of current TS 6.7.A.2 from "Annual Report" to "Occupational Radiation Exposure Report" to more accurately describe the content of the report. In addition, the licensee proposed changing the submittal date from "prior to March 1" to "prior to April 30" of each year. The licensee also proposed to change the word "shall" to "should" in the last sentence of current TS 6.7.A.2 such that it would read "In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions." The staff considers the proposed changes to be acceptable since the title change more accurately describes the report, submittal by April 30 of each year is considered timely, and the change from "shall" to "should" provides flexibility and reasonable assurance that radiological requirements will continue to be met. In addition, the staff notes that these changes are consistent with NUREG-1433.

The licensee proposed changing the title of current TS 6.7.A.3 from "Monthly Statistical Report" to "Monthly Operating Reports" to more accurately describe the report's contents. In addition, the licensee proposed removing a statement in this section and current TS section 6.7.A.4, "Core Operating Limits Report," indicating to which NRC offices the reports are to be sent. The staff considers these changes to be acceptable since the title change more accurately describes the report and 10 CFR 50.4, "Written Communications," adequately describes the requirements regarding submitting written communications to the NRC. In addition, the staff notes that this wording is consistent with NUREG-1433.

The licensee proposed changing the title of current TS 6.7.C.1 from "Annual Radioactive Effluent Release Report" to "Radioactive Effluent Release Report," relocating the information in this section to the Offsite Dose Calculation Manual (ODCM), and replacing the information in TS with the following: "The Radioactive Effluent Release Report covering the operation of the unit shall be submitted by May 15 of each year and in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released for the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1." The staff considers the proposed changes to be acceptable since the title change adequately describes the report, the information relocated to the ODCM is not required to remain in the TS by 10 CFR 50.36, and the information added to the TS adequately summarizes the report requirements. In addition, the staff notes that these change are consistent with NUREG-1433.

The licensee proposed relocating special reports required by current TS 6.7.C.2.a through 6.7.C.2.e from TS to the ODCM. The reports involve liquid effluents, gaseous effluents, total dose, radiological environmental monitoring, and land use. The staff considers the proposed changes to be acceptable since the reports are not required for safe operation of the plant and 10 CFR 50.36 does not require this information to be contained in the TS. In addition, the staff notes that these change are consistent with NUREG-1433.

The licensee proposed changing the title of current TS 6.7.C, proposed to become TS 6.6.E, from "Environmental Radiological Monitoring" to "Annual Radiological Environmental Operating Report" and changing references to this revised report title within the TS. The staff considers the proposed changes to be acceptable since the title change adequately describes the report. In addition, the licensee proposed to change the submittal requirement for this report from

May 1 to May 15 of each year. The staff considers this proposed change to be acceptable since submittal by May 15 of each year is considered timely. The licensee proposed replacing wording in this section describing the contents of the report to state "The material provided shall be consistent with the objectives outlined in the ODCM, and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C." This proposed change is acceptable to the staff since it adequately describes the information that the NRC expects to be contained in this report. The licensee proposed to relocate other reporting details from TS 6.7.C to the ODCM. The staff considers this change to be acceptable since 10 CFR 50.36 does not require the reporting details being removed to be contained in the TS. In addition, the staff notes the change to current TS 6.7.C is consistent with NUREG-1433.

3.13 Fire Protection Inspection

The licensee proposed relocating current TS Section 6.8, "Fire Protection Inspection," to the VOQAM. Future changes would be controlled by the requirements of 10 CFR 50.54(a). The staff indicated in Administrative Letter 95-06 that relocation of these requirements to the QA plan was acceptable since the provisions of 10 CFR 50.54(a) provide adequate controls. The proposed change is acceptable to the staff since the provisions of 10 CFR 50.54(a) are adequate to control future changes and 10 CFR 50.36 does not require this information to be contained in the TS.

3.14 Environmental Qualification

The licensee proposed removing current TS 6.9, "Environmental Qualification," from the TS. The staff considers this change to be acceptable since 10 CFR 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants," adequately addresses the requirements in this area. In addition, the staff notes this change is consistent with NUREG-1433 and 10 CFR 50.36 does not require this information to be contained in the TS.

3.15 Programs and Manuals

The licensee proposed inserting a new heading prior to current TS 6.10 stating "6.7 PROGRAMS AND MANUALS," to indicate the material which follows it in the TS. The staff considers this change to be acceptable since it adequately describes the material which follows it in the TS. In addition, the staff notes this change is consistent with NUREG-1433. The licensee also proposed the following changes to the programs and manuals section of TS.

The licensee proposed relocating current TS section 6.11, "Iodine Monitoring," and section 6.12, "Process Control Program," to the TRM. The staff finds these proposed changes to be acceptable since 10 CFR 50.36 does not require this information to be contained in the TS and the provisions of 10 CFR 50.59 provide adequate controls for these items. In addition, the staff notes this change is consistent with NUREG-1433.

The licensee proposed numbering, editorial, and administrative changes to current TS 3.13, "Off-Site Dose Calculation Manual (ODCM)," which do not change the technical requirements of this section. The staff considers the proposed changes to be acceptable since they do not

change the technical content of the TS. In addition, the licensee proposed adding the following to this section "The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Radioactive Effluent Release Report and the Annual Radiological Environmental Operating Report required by Specification 6.6.D and Specification 6.6.E, respectively." The staff considers this proposed addition to be acceptable since it adequately describes the NRC's expected content of the ODCM. In addition, the staff notes this change is consistent with NUREG-1433.

The licensee proposed relocating current TS Section 6.14, "Major changes to Radioactive Liquid, Gaseous, and solid Waste Treatment Systems," to the ODCM. The staff finds this proposed change to be acceptable since 10 CFR 50.36 does not require this information to be contained in TS. In addition, the staff notes this change is consistent with NUREG-1433.

The licensee proposed adding a new section TS 6.7.D, "Radioactive Effluent Controls Program." The licensee stated that the current TS do not specify requirements for a program which addresses only radioactive effluent controls. This section is added to provide a comprehensive program to implement guidance derived from NRC Generic Letter 89-01. This addition is more restrictive than the current TS. The staff finds the proposed addition to be acceptable since it adequately describes a radioactive effluent controls program expected by the staff.

3.16 Other Administrative Changes

The licensee proposed other editorial changes to Section 6.0 such as those required to support the renumbering of sections in TS Section 6.0. The staff considers these proposed changes to be acceptable since they are administrative only and do not change the technical requirements in the TS.

3.17 Licensee Commitments

As described in the application and the supplements, and as set forth above, the licensee has committed to relocate certain TS requirements to the TRM, ODCM, and VOQAM. Such commitments are important because the acceptability of removing these requirements from the TSs is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by the regulations (e.g., changes to the UFSAR will be in accordance with 10 CFR 50.59). Because the licensee has duplicated the relevant TS requirements in the TRM, ODCM, and VOQAM before completion of NRC review of the requested amendment, the licensee has already satisfied these commitments, and these requirements are already subject to appropriate regulatory control under 10 CFR 50.59 or 10 CFR 50.54(a), as applicable. Accordingly, the commitments have been adequately implemented.

4.0 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 comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 27326). The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 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.

Principal Contributor: R. Croteau

Date: July 19, 1999

DATED: July 19, 1999

AMENDMENT NO. 171 TO FACILITY OPERATING LICENSE NO. DPR-28 VERMONT
YANKEE NUCLEAR POWER STATION

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