

# VERMONT YANKEE NUCLEAR POWER CORPORATION

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December 6, 2001  
BVY 01-93

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

**Subject: Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
Technical Specification Proposed Change No. 252  
Schedule Information - Allowed Outage Times for  
Post Accident Monitoring Instrumentation**

Vermont Yankee (VY) Proposed Change No. 252, dated November 20, 2001 (BVY 01-86), requested an amendment to Facility Operating License, DPR-28 to revise allowable outage times (AOTs) and associated action requirements for certain post-accident monitoring (PAM) instrumentation. The extension of AOTs provides additional time to perform testing and maintenance without significantly affecting plant safety. This letter provides information with regard to VY's need for the requested amendment on an expedited basis.

Proposed Change No. 252 would provide PAM instrumentation AOTs with more reasonable time frames based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. VY initially requested that an amendment be issued within six months of submittal (i.e., within six months of November 20, 2001). However, further reviews by VY have highlighted the importance of the Proposed Change.

Due to the very short existing AOTs for some PAM instrumentation, planned maintenance activities that might render PAM instrumentation inoperable require very careful consideration. Voluntary entry into a Limiting Condition for Operation that requires a plant shutdown within six hours entails a risk that the system cannot be restored to an operable status and thus requiring an unintended plant shutdown with attendant transient considerations. In addition, because the plant may be required to be in a hot shutdown condition in as little as six hours by the Technical Specification action requirements for some PAM instrumentation, only limited maintenance activities of short duration can be planned if the PAM instrumentation is made inoperable. An example of a maintenance activity that might render PAM instrumentation inoperable includes the temporary removal of a barrier that protects the instrumentation from the effects of a high energy line break.

These operational and maintenance constraints pose a hardship to VY in planning work and at times causes a deferral of planned, preventative maintenance. Clearly, these overly restrictive limitations do not support optimal maintenance of equipment important to safety.

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Consequently, VY respectfully requests that the NRC staff expedite its review of Proposed Change No. 252 for a target amendment issuance date of February 1, 2002. The additional information provided herein does not change the scope or application of the initial request and does not change any safety considerations supporting the amendment request. If you have any questions on this transmittal, please contact me at (802) 258-4111.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

A handwritten signature in cursive script, appearing to read "Gautam Sen", is written over a solid horizontal line.

Gautam Sen  
Licensing Manager

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