November 8, 2002

Mr. Jay K. Thayer
Site Vice President - Vermont Yankee
Entergy Nuclear Vermont Yankee, LLC
P.O. Box 0500
185 Old Ferry Road
Brattleboro, VT 05302-0500

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION - REVIEW OF CHANGE IN INFORMATION THAT SUPPORTED THE SAFETY EVALUATION FOR AMENDMENT NO. 212 (TAC NO. MB6477)

Dear Mr. Thayer:

By letter dated March 19, 2002, Vermont Yankee Nuclear Power Corporation (VY) proposed to eliminate the reactor scram and main steam isolation valve closure Technical Specifications (TS) requirements associated with the main steam line radiation monitors (MSLRMs) and modify other TS requirements related to MSLRM trip functions, for the Vermont Yankee Nuclear Power Station (VYNPS). VY based the proposed changes on the methodology of the U.S. Nuclear Regulatory Commission (NRC) approved BWR Owners Group Licensing Topical Report NEDO-31400A. In Attachment 1 of the March 19, 2002 submittal, VY presented information to show that the radiological consequences analysis presented in NEDO-31400A bounds that for VYNPS. This amendment request was approved by the NRC staff's safety evaluation dated September 18, 2002, as Amendment No. 212 to Facility Operating License DPR-28.

On July 31, 2002, VY's interest in the license for VYNPS was transferred to Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operation, Inc. (ENO). On August 6, 2002, ENO requested that the NRC continue to review and act on all requests before the Commission which had been submitted by VY before the transfer. Accordingly, the NRC staff acted upon the request.

During the licensee's process of incorporating the changes into the VYNPS Updated Final Safety Analysis Report, information provided to the NRC on page 13 of Attachment 1 to the March 19, 2002, letter was found to be in error. By letter dated October 3, 2002, ENO submitted a correction to the information. The staff has reviewed the corrected information submitted October 3, 2002, and based on the following discussion, has determined that it does not affect conclusions that led to the issuance of Amendment No. 212.

In the control rod drop accident analysis, the fuel assumed to melt is a subset of the fuel assumed to have failed cladding. Fuel with failed cladding is assumed to release the fission products in the gap of the fuel, while the fuel assumed to melt would release a higher amount of fission products released from the melted fuel pellets. VY previously double-counted the release of fission products from the melted fuel in the NEDO-31400A analysis by comparing the total fission product release from both the gap and the melted fuel for the subset of melted fuel to the fission product release assumed in the VYNPS site-specific analysis, which does not assume fuel melt. The correction bases the comparison on the sum of the fission product

release from the fuel in the fraction of failed fuel rods assumed to melt and the fission product release from the gap of the remainder of the failed fuel rods. The staff finds that the correction is acceptable, based on the methodology used to determine the percentage of core fission product release. The corrected information provided by letter dated October 3, 2002, does show that the NEDO-31400A control rod drop radiological consequences analysis bounds by a smaller margin the VYNPS analysis with respect to the release of fission products from the fuel. Since this information was presented to show that the NEDO-31400A analysis bounds the plant-specific analysis, the correction does not affect the staff's previous conclusion which led to the issuance of Amendment No. 212 to DPR-28.

Sincerely,

/RA/

Robert M. Pulsifer, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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Sincerely,

/RA/

Robert M. Pulsifer, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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