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185 Old Ferry Road
Brattleboro, VT 05302-0500

April 16, 2003
BVY 03-38

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)
Revision of Technical Specification Bases Page**

This letter provides a revised Technical Specification (TS) Bases page.

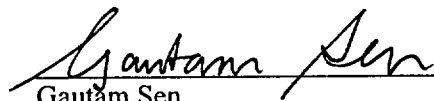
Bases page 97 has been revised to delete the Standby Liquid Control System (SLCS) 5% delta k shutdown margin specified. This change is based upon allowing the use of approved General Electric methods to determine the cycle-specific SLCS shutdown margin. The Updated Final Safety Analysis Report (section 3.8.4) was previously revised in the same manner.

This change to the TS Bases has been determined to not require a license amendment in accordance with 10CFR50.59 and therefore does not require prior NRC approval.

For your information, a marked up copy of the Bases page as well as a re-typed copy are included as Attachments 1 and 2 for your records.

Should you have any questions concerning this matter, please contact Mr. Jeffrey T. Meyer at (802) 258-4105.

Sincerely,



Gautam Sen
Manager, Licensing

Attachments

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

A 001

SUMMARY OF VERMONT YANKEE COMMITMENTS

BVY NO.: 03-38

The following table identifies commitments made in this document by Vermont Yankee. Any other actions discussed in the submittal represent intended or planned actions by Vermont Yankee. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager of any questions regarding this document or any associated commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"
None	N/A

Technical Specification Bases Revision

Marked-up Version of Bases Page

BASES:3.4 & 4.4 REACTOR STANDBY LIQUID CONTROL SYSTEMA. Normal Operation

The design objective of the Reactor Standby Liquid Control System is to provide the capability of bringing the reactor from full power to a cold, xenon-free shutdown assuming that none of the withdrawn control rods can be inserted. To meet this objective, the Standby Liquid Control System is designed to inject a quantity of boron which produces a concentration of 800 ppm of natural boron in the reactor core in less than 138 minutes. An 800 ppm natural boron concentration in the reactor core is required to bring the reactor from full power to a $\text{\textcircled{5\%}}$ ~~AK~~ subcritical condition. An additional margin (25% of boron) is added for possible imperfect mixing of the chemical solution in the reactor water. A minimum quantity of 3850 gallons of solution having a 10.1% natural sodium pentaborate concentration is required to meet this shutdown requirement.

The time requirement (138 minutes) for insertion of the boron solution was selected to override the rate of reactivity insertion due to cooldown of the reactor following the xenon poison peak. For a required minimum pumping rate of 35 gallons per minute, the maximum net storage volume of the boron solution is established as 4830 gallons.

In addition to its original design basis, the Standby Liquid Control System also satisfies the requirements of 10CFR50.62(c)(4) on anticipated transients without scram (ATWS) by using enriched boron. The ATWS rule adds hot shutdown and neutron absorber (i.e., boron-10) injection rate requirements that exceed the original Standby Liquid Control System design basis. However, changes to the Standby Liquid Control System as a result of the ATWS rule have not invalidated the original design basis.

With the reactor mode switch in the "Run" or "Startup/Hot Standby" position, shutdown capability is required. With the mode switch in "Shutdown," control rods are not able to be withdrawn since a control rod block is applied. This provides adequate controls to ensure that the reactor remains subcritical. With the mode switch in "Refuel," only a single control rod can be withdrawn from a core cell containing fuel assemblies. Determination of adequate shutdown margin by Specification 3.3.A ensures that the reactor will not become critical. Therefore, the Standby Liquid Control System is not required to be operable when only a single control rod can be withdrawn.

Pump operability testing (by recirculating demineralized water to the test tank) in accordance with Specification 4.6.E is adequate to detect if failures have occurred. Flow, relief valve, circuitry, and trigger assembly testing at the prescribed intervals assures a high reliability of system operation capability. Recirculation of the borated solution is done during each operating cycle to ensure one suction line from the boron tank is clear. In addition, at least once during each operating cycle, one of the standby liquid control loops will be initiated to verify that a flow path from a pump to the reactor vessel is available by pumping demineralized water into the reactor vessel.

B. Operation With Inoperable Components

Only one of the two standby liquid control pumping circuits is needed for proper operation of the system. If one pumping circuit is found to

Technical Specification Bases Revision

Re-typed Version of Bases Page

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