



Entergy Nuclear Vermont Yankee, LLC  
Entergy Nuclear Operations, Inc.  
185 Old Ferry Road  
Brattleboro, VT 05302-0500

May 21, 2003  
BVY 03-50

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 Specifications Proposed Change No. 259  
Supplement No. 1  
Instrumentation Technical Specifications**

By letter dated April 25, 2003 (BVY 03-40), Vermont Yankee<sup>1</sup> (VY) proposed broad changes to certain instrumentation Technical Specifications (TS) for the Vermont Yankee Nuclear Power Station. Included in the submittal was a Safety Assessment of Changes for TS 3.2.B/4.2.B – PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION. Page 15 of the subject Safety Assessment was inadvertently omitted from the April 25, 2003 request for license amendment. Enclosed is the missing page.

The information provided herewith does not change the initial No Significant Hazards Consideration determination and does not expand the scope of the original application. VY regrets any inconvenience this may have caused.

If you have any questions on this transmittal, please contact Mr. Len Gucwa at (802) 258-4225.

Sincerely,


  
\_\_\_\_\_  
Jay K. Thayer  
Site Vice President

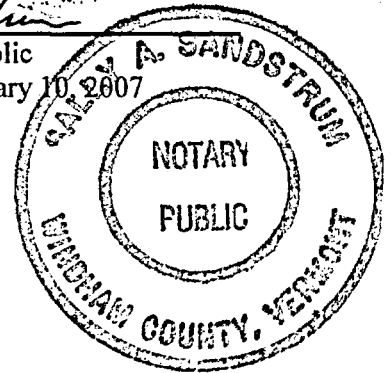
<sup>1</sup> Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. are the licensees of the Vermont Yankee Nuclear Power Station

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STATE OF VERMONT        )  
                                  )ss  
WINDHAM COUNTY         )

Then personally appeared before me, Jay K. Thayer, who, being duly sworn, did state that he is Site Vice President of the Vermont Yankee Nuclear Power Station, that he is duly authorized to execute and file the foregoing document, and that the statements therein are true to the best of his knowledge and belief.

  
Sally A. Sandstrum, Notary Public  
My Commission Expires February 10, 2007



Attachment

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

Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 259

Supplement No. 1

Instrumentation Technical Specifications

Missing Page From Original Submittal

SAFETY ASSESSMENT OF CHANGES  
TS: 3.2.B/4.2.B - PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION

TECHNICAL CHANGES - LESS RESTRICTIVE

- L.4 (continued) Instrumentation, Part 2," July 1990, and NEDC-30851-P-A Supplement 2, "Technical Specifications Improvement Analyses for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989. Application of these analyses to the VYNPS primary containment isolation instrumentation Trip Functions, including the associated Trip System Logics, was approved by the NRC in VYNPS License Amendment No. 186 dated April 3, 2000. This change is consistent with the ISTS.
- L.5 CTS 3.2.B does not allow primary containment penetration flow paths that are isolated as a result of complying with actions in CTS Table 3.2.2 to be unisolated under administrative controls. Proposed Table 3.2.2 Action Notes 1 and 2.a contain an allowance for intermittently unisolating, under administrative control, primary containment penetrations that were isolated as a result of complying with Table 3.2.2 Action Notes. Unisolating primary containment penetrations on an intermittent basis may be required for performing surveillances, repairs, routine evolutions, etc. Intermittently opening closed primary containment isolation valves is acceptable due to the low probability of an event that could pressurize the primary containment during the short time in which the primary containment isolation valve is open and the administrative controls established to ensure the affected penetration can be isolated when a need for primary containment isolation is indicated. The administrative control will consist of stationing a dedicated operator at the controls of the associated isolation valve, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for primary containment isolation is indicated. The change is consistent with ISTS.

RELOCATED SPECIFICATIONS

None