



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

June 11, 2003
BVY 03-59

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

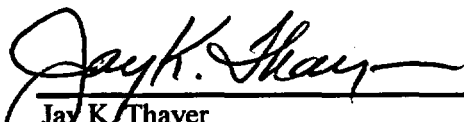
**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Technical Specifications Proposed Change No. 259
Supplement No. 2
Instrumentation Technical Specifications**

By letter dated April 25, 2003 (BVY 03-40), as supplemented by letter dated May 21, 2003 (BVY 03-50), Vermont Yankee¹ (VY) requested changes to certain instrumentation Technical Specifications (TS) for the Vermont Yankee Nuclear Power Station.

Because of the breadth of changes proposed by the subject license amendment request, numerous, detailed No Significant Hazards Consideration (NSHC) determinations were included in the original application. To support noticing of the NSHC determinations in a summary form, VY is providing the enclosed summary NSHC determination. This summary NSHC is consistent with the individual NSHCs previously submitted.

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

Sincerely,



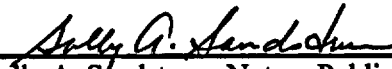
Jay K. Thayer
Site Vice President

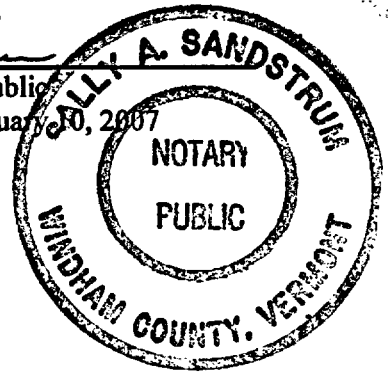
¹ Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. are the licensees of the Vermont Yankee Nuclear Power Station

A001

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

Docket No. 50-271
BVY 03-59

Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 259

Supplement No. 2

Instrumentation Technical Specifications

Summary No Significant Hazards Consideration

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of amendment request:

The proposed changes consist of a comprehensive revision to the Technical Specifications (TS) for protective instrumentation, including TS Sections 2.1, "Limiting Safety System Setting," 3.1, "Reactor Protection System," 3.2, "Protective Instrument System," associated Surveillance Requirements, and other TS with similar requirements as these instrumentation TS sections. The Improved Standard Technical Specifications¹ were used as guidance in developing the proposed change. In addition, the associated Bases for the changed specifications have been enhanced.

Each of the proposed changes to the existing TS was characterized as either (1) an administrative (non-technical) change, (2) involving the relocation of requirements, (3) involving more restrictive requirements, or (4) involving less restrictive requirements.

Basis for no significant hazards determination:

Pursuant to 10CFR50.92, VY has reviewed the proposed change and concludes that the change does not involve a significant hazards consideration since the proposed change satisfies the criteria in 10CFR50.92(c). These criteria require that the operation of the facility in accordance with the proposed amendment will not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. The discussion below addresses each of these criteria and demonstrates that the proposed amendment does not constitute a significant hazard.

1. **The operation of Vermont Yankee Nuclear Power Station in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed changes do not significantly affect the design or fundamental operation and maintenance of the plant. Accident initiators or the frequency of analyzed accident events are not significantly affected as a result of the proposed changes; therefore, there will be no significant change to the probabilities of accidents previously evaluated.

The proposed changes do not significantly alter assumptions or initial conditions relative to the mitigation of an accident previously evaluated. The proposed changes continue to ensure process variables, structures, systems, and components (SSCs) are maintained consistent with the safety analyses and licensing basis. The revised technical specifications continue to require that SSCs are properly maintained to ensure operability and performance of safety functions as assumed in the safety analyses. The design basis events analyzed in the safety analyses will not change significantly as a result of the proposed changes to the TS.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

¹ NUREG 1433, Revision 2, Standard Technical Specifications, General Electric Plants, BWR/4, dated April 30, 2001

2. The operation of Vermont Yankee Nuclear Power Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve any physical alteration of the plant (no new or different type of equipment being installed) and do not involve a significant change in the design, normal configuration or basic operation of the plant. The proposed changes do not introduce any new accident initiators. In some cases, the proposed changes impose different requirements; however, these new requirements are consistent with the assumptions in the safety analyses and current licensing basis. Where requirements are relocated to other licensee-controlled documents, adequate controls exist to ensure their proper maintenance.

The proposed changes do not involve significant changes in the fundamental methods governing normal plant operation and do not require unusual or uncommon operator actions. The proposed changes provide assurance that the plant will not be operated in a mode or condition that violates the essential assumptions or initial conditions in the safety analyses and that SSCs remain capable of performing their intended safety functions as assumed in the same analyses. Consequently, the response of the plant and the plant operator to postulated events will not be significantly different.

Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. The operation of Vermont Yankee Nuclear Power Station in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

Margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident situation. The proposed changes do not significantly affect any of the assumptions, initial conditions or inputs to the safety analyses. Plant design is unaffected by these proposed changes and will continue to provide adequate defense-in-depth and diversity of safety functions as assumed in the safety analyses.

There is no proposed change to Safety Limits and only administrative and a more restrictive change to Limiting Safety System Setting requirements. The proposed changes maintain requirements consistent with safety analyses assumptions and the licensing basis. Fission product barriers will continue to meet their design capabilities without any significant impact to their ability to maintain parameters within acceptable limits. The safety functions are maintained within acceptable limits without any significant decrease in capability.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.