Entergy

Entergy Nuclear Vermont Yankee, LLC
Entergy Nuclear Operations, Inc.
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June 17, 2004
BVY 04-053

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Proposed Technical Specification Change No. 265
Eliminate Requirements for Hydrogen/Oxygen Monitors Using the Consolidated Line Item Improvement Process (CLIIP)

Dear Sir:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) hereby proposes to amend Vermont Yankee Nuclear Power Station's (VY) Facility Operating License, DPR-28, by incorporating the attached proposed change into the VY Technical Specifications (TS).

The proposed amendment will delete the Vermont Yankee TS requirements related to the hydrogen/oxygen monitors. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003. The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the *Federal Register* on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

Post-accident hydrogen recombiners are not installed at Vermont Yankee. Consequently, that portion of the CLIIP has not been addressed in this proposed amendment.

Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific verifications and commitments. Attachment 2 provides the existing TS pages marked-up to show the proposed changes. Attachment 3 provides retyped TS pages. Attachment 4 provides a summary of regulatory commitments.

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ENO has reviewed the proposed changes to the current license basis in accordance with 10CFR50.92 and concludes that the proposed change does not involve a significant hazards consideration.

ENO requests approval of the proposed License Amendment by October 1, 2004, for implementation within 60 days from the date of approval. Approval of this proposed amendment, and subsequent implementation, supports a VY initiative to improve the reliability of the subject plant equipment.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Vermont State Official.

If you have any questions regarding this submittal, please contact Mr. James DeVincentis at (802) 258-4236.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 17th day of June, 2004.

Sincerely,

Jay K. Thayer
Site Vice President

Attachments:
1. Description and Assessment
2. Proposed Technical Specifications: Marked-up Pages
3. Revised Technical Specifications Pages
4. Summary of Commitments

cc:
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Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 265

Eliminate Requirements for Hydrogen/Oxygen Monitors Using the

Consolidated Line Item Improvement Process

DESCRIPTION AND ASSESSMENT

Attachment 1 to BVY-04-053
Entergy Nuclear Operations, Inc. – Vermont Yankee
Docket No. 50-271, DPR No. 28

Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes references to the hydrogen and oxygen monitors in Vermont Yankee's (VY) Technical Specifications (TS) Tables 3.2.6 ("Post-Accident Instrumentation") and 4.2.6 ("Calibration Requirements, Post-Accident Instrumentation"). The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003.

The changes are consistent with Revision 1 of NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the *Federal Register* on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

Post-accident hydrogen recombiners are not installed at Vermont Yankee. Consequently, that portion of the CLIIP is not applicable.

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC approved Revision 1 of TSTF-447, the proposed TS changes include:

Table 3.2.6	Item associated with "Containment Hydrogen/Oxygen Monitor"	Deleted
Table 4.2.6	Item associated with "Containment Hydrogen/Oxygen Monitor"	Deleted

The changes proposed consist of deleting entries from Table 3.2.6 and 4.2.6 of the VY TS, which relate to the post-accident hydrogen and oxygen monitors. No changes to the TS Bases are proposed.

The VY custom TS contain specifications that are different than the model TS changes contained in the CLIIP. The model TS are based on the Improved Standard TS. The differences between the VY custom TS and the CLIIP model TS are primarily in the area of TS that exist in the CLIIP Model TS that do not exist in the VY TS.

Commitments for hydrogen and oxygen monitors contained in the CLIIP, are addressed in Section 6.0 below.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, Rev. 1, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, Rev. 1, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

5.0 TECHNICAL ANALYSIS

ENO has reviewed the safety evaluation (SE) published on September 25, 2003 (68 FR 55416) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's safety evaluation, as well as the supporting information provided to support TSTF-447, Rev. 1. ENO has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to VY and justify this amendment for the incorporation of the changes to the VY TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on September 25 (68 FR 55416), TSTF-447, Rev. 1, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

6.1 Verification and Commitments

As discussed in the model safety evaluation published in the *Federal Register* on September 25, 2003 (68 FR 55416) for this TS improvement, ENO is making the following verifications and regulatory commitments:

- ENO has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at VY and is making a regulatory commitment to maintain that capability (at least to the level of Regulatory Guide 1.97, Category 3). The hydrogen monitors are described in VY's Program Manual, "Guidance and Methodology Associated with Vermont Yankee's Regulatory Guide 1.97 Program Commitments," (Reference 2) which is referenced in the Regulatory Guide 1.97 program procedure (Reference 3). The program manual is referred to by Section 7.4.3.1 of the UFSAR. One of the purposes of the VY Regulatory Guide 1.97 program is to "ensure Vermont Yankee's post-accident monitoring instrumentation is maintained in accordance with licensing commitments" (program procedure Section 1.1.1.3). The program manual (Reference 2) will be revised, as appropriate, to reflect the commitment made in the license amendment within 60 days from the date of the approval of this proposed amendment.

- Vermont Yankee has an inerted containment. ENO has verified that an oxygen monitoring system (oxygen analyzers) capable of verifying the status of the inerted containment is installed at Vermont Yankee and is making a regulatory commitment to maintain that capability (at least to the level of Regulatory Guide

1.97, Category 2). The oxygen monitors are described in Vermont Yankee's "Guidance and Methodology Associated with Vermont Yankee's Regulatory Guide 1.97 Program Commitments," (Reference 2) which is referenced in the Regulatory Guide 1.97 program procedure (Reference 3). The program manual is referred to by Section 7.4.3.1 of the UFSAR. One of the purposes of the VY Regulatory Guide 1.97 program is to "ensure Vermont Yankee's post-accident monitoring instrumentation is maintained in accordance with licensing commitments" (program procedure Section 1.1.1.3). The program manual (Reference 2) will be revised, as appropriate, to reflect the commitment made in the license amendment within 60 days from the date of the approval of this proposed amendment.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

ENO has reviewed the proposed changes to the current license basis in accordance with 10CFR50.92 and concludes that the proposed change does not involve a significant hazards consideration. ENO has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416) as part of the CLIIP. ENO has concluded that the proposed determination presented in the notice is applicable to Vermont Yankee and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on September 25, 2003 (68 FR 55416) as part of the CLIIP. ENO has concluded that the staff's findings presented in that evaluation are applicable to Vermont Yankee and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. ENO is not proposing variations or deviations from the applicable TS changes described in TSTF-447, Rev. 1, or the NRC staff's model safety evaluation, published on September 25, 2003 (68 FR 55416).

10.0 REFERENCES

1. Federal Register Notice, "Notice of Availability of Model Application Concerning Technical Specification Improvement To Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process," published September 25, 2003 (68 FR 55416).

2. Entergy Nuclear Operations, Inc., Vermont Yankee Nuclear Power Station, "Guidance and Methodology Associated with Vermont Yankee's Regulatory Guide 1.97 Programs Commitments." (program manual)

3. Entergy Nuclear Operations, Inc., Vermont Yankee Nuclear Power Station, PP 7008, "Regulatory Guide 1.97 Program." (program procedure)

Attachment 2

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 265

Eliminate Requirements for Hydrogen/Oxygen Monitors Using the

Consolidated Line Item Improvement Process

TECHNICAL SPECIFICATIONS: MARKED-UP PAGES
(2 pages)

TS PAGES

54
71

TABLE 3.2.6
(Cont'd)

POST-ACCIDENT INSTRUMENTATION

Minimum Number of Operable Instrument Channels (Note 8)	Parameter	Type of Indication	Instrument Range
1/valve	Safety Valve Position From Acoustic Monitor (Note 5)	Meter ZI-2-1A/B	Closed - Open
2	Containment Hydrogen/Oxygen Monitor (Notes 1 and 3)	Recorder SR-VG-6A (SI) Recorder SR-VG-6B (SII)	0-30% hydrogen 0-25% oxygen
2	Containment High-Range Radiation Monitor (Note 6)	Meter RM-16-19-1A/B	1 R/hr-10^7 R/hr
1	Stack Noble Gas Effluent (Note 7)	Meter RM-17-155	0.1 - 10^7 mR/hr

TABLE 4.2.6

CALIBRATION REQUIREMENTS

POST-ACCIDENT INSTRUMENTATION
(Cont'd)

Parameter	Calibration	Instrument Check
Containment Hydrogen/Oxygen Monitor	Once/Operating Cycle	Once each day
Containment High-Range Radiation Monitor	Once/Operating Cycle	Once each day
Stack Noble Gas Effluent	Every Operating Cycle (a Functional Test to be performed quarterly)	Once each day

Attachment 3

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 265

Eliminate Requirements for Hydrogen/Oxygen Monitors Using the

Consolidated Line Item Improvement Process

TECHNICAL SPECIFICATION: RETYPED PAGES
(2 pages)

TS PAGES

54
71

TABLE 3.2.6
(Cont'd)

POST-ACCIDENT INSTRUMENTATION

Minimum Number of Operable Instrument Channels (Note 8)	Parameter	Type of Indication	Instrument Range
1/valve	Safety Valve Position From Acoustic Monitor (Note 5)	Meter ZI-2-1A/B	Closed - Open
2	Containment High-Range Radiation Monitor (Note 6)	Meter RM-16-19-1A/B	1 R/hr-10^7 R/hr
1	Stack Noble Gas Effluent (Note 7)	Meter RM-17-155	0.1 - 10^7 mR/hr

Attachment 4

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 265

Eliminate Requirements for Hydrogen/Oxygen Monitors Using the

Consolidated Line Item Improvement Process

SUMMARY OF REGULATORY COMMITMENTS

Attachment 4 to BVY-04-053
Entergy Nuclear Operations, Inc. – Vermont Yankee
Docket No. 50-271, DPR No. 28

The following table identifies those actions committed to by ENO in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

SUMMARY OF REGULATORY COMMITMENTS

Commitments	Description	Completion Schedule
BVY 04-053-01	The hydrogen monitoring system will maintain the capability of diagnosing beyond design-basis accidents (at least to the level of Regulatory Guide 1.97, Category 3).	60 days from the date of approval of the proposed amendment.
BVY 04-053-02	The oxygen monitoring system will maintain the capability of verifying the status of the inerted containment (at least to the level of Regulatory Guide 1.97, Category 2).	60 days from the date of approval of the proposed amendment.
BVY 04-053-03	The hydrogen/oxygen monitors are described in Vermont Yankee's 1.97 regulatory guide program manual. This document will be revised, as appropriate, to reflect the license amendment within 60 days from the date of the approval of this proposed amendment.	60 days from the date of approval of the proposed amendment.