



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Vermont Yankee
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Brattleboro, VT 05302
Tel 802-257-5271

January 17, 2005

Docket No. 50-271
BVG 05-002

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

Subject: **Vermont Yankee Nuclear Power Station
Corrected Technical Specification Bases Page and
Administrative Changes to Facility Operating License Page**

- References:
- 1) Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Implementation of ARTS/MELLLA (TAC No. MB8070)," NVE 04-031, April 14, 2004.
 - 2) Letter, Entergy to USNRC, "Vermont Yankee Nuclear Power Station, License No. DPR-28 (Docket No. 50-271) Revision of Technical Specification Bases Page," BVY 03-38, April 16, 2003.
 - 3) Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station - Revision of Technical Specification Bases Page (TAC No. MB8727)," NVE 03-38, May 15, 2003.
 - 4) Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Administrative Change to Facility Operating License in Conjunction with the Commission Order EA-03-086 Regarding Revised Design Basis Threat (DBT); and Revisions to Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (TAC No. MC2984)," NVE 04-111, October 28, 2004.

Dear Sir:

Entergy Nuclear Operations, Inc. (Entergy) hereby provides a corrected Technical Specification Bases page and a proposed replacement page for the Facility Operating License, DPR-28, for Vermont Yankee Nuclear Power Station (VY).

License Amendment 219 (Reference 1) inadvertently did not incorporate a prior change to Technical Specifications Bases page 97 that was submitted to the NRC on April 16, 2003 (Reference 2) and acknowledged by the NRC on May 15, 2003 (Reference 3). This change to the Technical Specification Bases was determined to not require a license amendment in accordance with 10CFR50.59 and therefore did not require prior NRC approval. As discussed

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with the NRR Project Manager, the inadvertent omission of this change in the License Amendment 219 retyped pages was unintentional. It is requested that License Amendment 219 be supplemented to provide a corrected TS Bases page 97, as provided in this letter.

Secondly, by letter dated October 28, 2004 (Reference 4), NRC provided a replacement page 7 to the VY Facility Operating License. The retyped page provided by the NRC removed the notes in the left margin identifying historical Amendment affects on the page. In accordance with past practices at VY, Entergy requests that the License Amendment numbers previously affecting this page be included, however stricken, in the footer of the page. The subject letter also introduced a typographical error on page 7, paragraph F. Therefore, Entergy proposes that what appears to be a letter "l" be corrected to numeral "1" in one of the listed dates. Specifically, "12/l/86" should be changed to "12/1/86".

Attachment 1 to this letter provides the marked-up version of the current Technical Specification Bases page and Facility Operating License page. Attachment 2 provides the retyped pages.

In accordance with 10CFR50.91, a copy of this letter and the associated attachments are being submitted to the designated Vermont State official.

There are no new commitments being made in this submittal.

If you have any questions or require additional information, please contact me at (802) 258-4236.

Sincerely,



James M. DeVincentis
Manager, Licensing
Vermont Yankee Nuclear Power Station

Attachments (2)

cc: (next page)

cc: Mr. Richard B. Ennis, Project Manager
License Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O-8-B1
Washington, DC 20555-0001

Mr. Samuel J. Collins
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

USNRC Resident Inspector
Vermont Yankee Nuclear Power Station
320 Governor Hunt Road
Vernon, VT 05354

Mr. David O'Brien, Commissioner
Vermont Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601

ATTACHMENT 1 TO BVY 05-002

Vermont Yankee Nuclear Power Station

**Corrected Technical Specification Bases Page and
Administrative Changes to Facility Operating License Page**

MARKED-UP PAGES

**ENTERGY NUCLEAR OPERATIONS, INC.
VERMONT YANKEE NUCLEAR POWER STATION
DOCKET NO. 50-271**

c. A verification or coding system for emergency messages between Entergy Nuclear Operations, Inc. and the state police headquarters of the respective states and the Commonwealth.

14. Entergy Nuclear Operations, Inc. shall furnish advance notification to MDPH, or to another Commonwealth agency designated by MDPH, of the time, method and proposed route through the Commonwealth of any shipments of nuclear fuel and wastes to and from the Vermont Yankee facility which will utilize railways or roadways in the Commonwealth.

F. Entergy Nuclear Operations, Inc. shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for the facility and as approved in the SER dated January 13, 1978, and supplemental SERS, dated 9/12/79, 2/20/80, 4/15/80, 7/3/80, 10/24/80, 11/10/81, 1/13/83, 7/24/84, 3/25/86, 12/1/86, 12/8/89, 11/29/90, 8/30/95, 3/23/97, 6/9/97, 8/12/97, 3/6/98, 3/31/98, 9/2/98, and 2/24/99, subject to the following provisions:

Entergy Nuclear Operations, Inc. may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

G. Security Plan

Entergy Nuclear Operations, Inc. shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans¹, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Vermont Yankee Nuclear Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," submitted by letter dated October 18, 2004.

¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

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

The design objective of the Reactor Standby Liquid Control System (SLCS) 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 ~~BYA~~ 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. The maximum SLCS pump discharge pressure during the limiting ATWS event is 1320 psig. This value is based on a peak reactor vessel lower plenum pressure of 1290 psia that occurs during the limiting ATWS event at the time of SLCS initiation, i.e., 120 seconds into the event. There is adequate margin to prevent the SLCS relief valve from lifting. With a nominal SLCS relief valve setpoint of 1400 psig, there is a margin of 80 psi between the peak SLCS pump discharge pressure and the relief valve nominal setpoint. 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.

BYA 03-28

ATTACHMENT 2 TO BVY 05-002

Vermont Yankee Nuclear Power Station

**Corrected Technical Specification Bases Page and
Administrative Changes to Facility Operating License Page**

RETYPE PAGES

**ENTERGY NUCLEAR OPERATIONS, INC.
VERMONT YANKEE NUCLEAR POWER STATION
DOCKET NO. 50-271**

Listing of Affected Technical Specifications Pages

Replace the Vermont Yankee Nuclear Power Station Technical Specifications page listed below with the revised page. The revised page contains a vertical line in the margin indicating the area of change.

<u>Remove</u>	<u>Insert</u>
Operating License – Page 7	Operating License – Page 7
97	97

c. A verification or coding system for emergency messages between Entergy Nuclear Operations, Inc. and the state police headquarters of the respective states and the Commonwealth.

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