Entergy

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December 12, 2005

Docket No. 50-271
BVY 05-105

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

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28
Correction to Technical Specifications Pages

References:

1) Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Intermediate Range Monitor Surveillance Test Frequencies (TAC No. MB9091)," NVY 05-082, July 7, 2005.

2) Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Administrative Changes (TAC No. MC5243)," NVY 05-099, August 15, 2005.

3) Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: One-Time Extension of Integrated Leak Rate Test Interval (TAC No. MC4662)," NVY 05-108, August 31, 2005.

Entergy Nuclear Operations, Inc. (Entergy) hereby provides corrected Technical Specifications (TS) pages for the Vermont Yankee Nuclear Power Station (VY).

The Nuclear Regulatory Commission (NRC) recently issued License Amendments 225, 226 and 227 (References 1, 2 and 3 respectively) to VY's Facility Operating License which inadvertently did not incorporate prior NRC approved revisions to some of the TS pages.

As discussed with the NRR Project Manager, the inadvertent omission of these changes in the respective License Amendment issued pages was unintentional. These errors were entered into VY's corrective action program. A review of the other changes made by these amendments revealed no other discrepancies.

It is requested that NRC issue the four corrected TS pages, as provided in this letter.

Attachment 1 to this letter provides a description of the changes. Attachment 2 provides the marked-up version of the current Technical Specification Bases pages. Attachment 3 provides the retyped pages.

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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 (3)

cc: Mr. Samuel J. Collins
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ATTACHMENT 1 TO BVY 05-105

Vermont Yankee Nuclear Power Station

Correction to Technical Specifications Pages

DESCRIPTION OF CHANGES

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

Description of Changes

The Nuclear Regulatory Commission (NRC) recently issued License Amendments 225, 226 and 227 (References 1, 2 and 3 respectively) to the Technical Specifications (TS) for the Vermont Yankee Nuclear Power Station (VY). The replacement TS pages inadvertently did not incorporate prior NRC approved revisions to some of the TS pages. As discussed with the NRR Project Manager, the inadvertent omission of these changes in the respective License Amendment issued pages was unintentional. The following description of changes provides information about each of the requested corrections.

1. Correction to TS page 27:

   License Amendment 225 (Reference 1) inadvertently did not incorporate a change to TS page 27 that was previously approved by License Amendment 219 (Reference 4). In TS page 27, Table 4.1.2, the text "Every 3 Months (9)," was unintentionally omitted from the Minimum Frequency column for the High Flux Average Power Range Monitor (APRM) Flow Bias. A corrected retyped TS page 27 is provided in Attachment 3.

   Justification: In Entergy's letter to the NRC dated May 21, 2003 (Reference 5), Entergy proposed to revise the functional test frequency for the Intermediate Range Monitors. Entergy's original submittal, which included a retyped version of TS page 27, was submitted prior to NRC's issuance of License Amendment 219, dated April 14, 2004, and therefore did not incorporate changes made by License Amendment 219. Just prior to NRC's issuance of License Amendment 225, Entergy provided final TS pages that inadvertently did not reflect changes to TS page 27 made by License Amendment 219. This incorrect version of TS page 27 was then issued in License Amendment 225 and implemented in the VY TS.

2. Correction to TS page 120:

   License Amendment 226 (Reference 2) inadvertently did not incorporate a change to TS Section 3.6.D.1 (page 120) that was previously approved by License Amendment 219 (Reference 4). The approved change of text from "both safety valves" to "all safety valves" was unintentionally overlooked on the retyped page 120 provided by License Amendment 226. A corrected retyped TS page 120 is provided in Attachment 3.

   Justification: The retyped TS page 120 provided in Entergy's letter to the NRC dated December 6, 2004 (Reference 6) showed the incorrect phrase "both safety valves" rather than the correct phrase "all safety valves." This incorrect version of TS page 120 was then issued in License Amendment 226 and implemented in the VY TS.

3. Correction to TS page 155a:

   License Amendment 226 (Reference 2) inadvertently did not incorporate a change to TS Section 4.7.C.1 (page 155a) that was previously approved by License Amendment 223 (Reference 7). The value "1,550 cfm" was inadvertently changed back to "1,500 cfm" on the retyped page 155a provided by License Amendment 226. A corrected retyped TS page 155a is provided in Attachment 3.

Justification: The retyped TS page 155a provided in Entergy's letter to the NRC dated December 6, 2004 (Reference 6) was submitted prior to NRC's issuance of License Amendment 223, dated March 29, 2005 (Reference 7), and therefore did not incorporate changes made by License Amendment 223. Just prior to NRC's issuance of License Amendment 226, Entergy provided final TS pages that inadvertently did not correctly reflect changes to TS page 155a made by License Amendment 223. This incorrect version of TS page 155a was then issued in License Amendment 226 and implemented in the VY TS.

4. Correction to TS page 265:

The retyped page 265 provided by License Amendment 227 (Reference 3) unintentionally omitted a sentence, "The maximum allowable primary containment leakage rate, La, at Pa, shall be 0.8% of primary containment air weight per day." A corrected retyped TS page 155a is provided in Attachment 3.

Justification: Just prior to NRC's issuance of License Amendment 227, Entergy provided final TS pages to reflect changes made by Amendment 223 (Reference 7). Amendment 223 changes were correctly reflected; however, the subject sentence was inadvertently deleted. This incorrect version of TS page 265 was then issued in License Amendment 227 and implemented in the VY TS.

References:

1. Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Intermediate Range Monitor Surveillance Test Frequencies (TAC No. MB9091)," Amendment No. 225, NVY 05-082, July 7, 2005.

2. Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Administrative Changes (TAC No. MC5243)," Amendment No. 226, NVY 05-099, August 15, 2005.

3. Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: One-Time Extension of Integrated Leak Rate Test Interval (TAC No. MC4662)," Amendment No. 227, NVY 05-108, August 31, 2005.

4. Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Implementation of ARTS/MELLLA (TAC No. MB8070)," Amendment No. 219, NVY 04-031, April 14, 2004.

5. Letter, Entergy to USNRC, "Vermont Yankee Nuclear Power Station, License No. DPR-28 (Docket No. 50-271), Technical Specification Proposed Change No. 260, Intermediate Range Monitor Surveillance Test Frequencies," BVY 03-49, May 21, 2003.

6. Letter, Entergy to USNRC, "Vermont Yankee Nuclear Power Station, Technical Specification Proposed Change No. 270, Administrative Changes," BVY 04-118, December 6, 2004.

7. Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Alternative Source Term (TAC No. MC0253)," Amendment No. 223, NVY 05-045, March 29, 2005.

ATTACHMENT 2 TO BVY 05-105

Vermont Yankee Nuclear Power Station

Correction to Technical Specification Pages

MARKED-UP PAGES

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

TABLE 4.1.2

SCRAM INSTRUMENT CALIBRATION

MINIMUM CALIBRATION FREQUENCIES FOR REACTOR PROTECTION INSTRUMENT CHANNELS

Instrument Channel	Group (1)	Calibration Standard (4)	Minimum Frequency (2)
High Flux IRM Output Signal (7) (10) (11)	C	Standard Voltage Source	Once/Operating Cycle
High Flux APRM			
Output Signal	B	Heat Balance	Once Every 7 Days
Output Signal (Reduced) (7)	B	Heat Balance	Once Every 7 Days
Flow Bias	B	Standard Pressure and Voltage Source	~~Refueling Outage~~ Every 3 Months (9)
LPRM (LPRM ND-2-1-104(80))	B (5)	Using TIP System	Every 2,000 MWD/T average core exposure (8)
High Reactor Pressure	B	Standard Pressure Source	Once/Operating Cycle
Turbine Control Valve Fast Closure	A	Standard Pressure Source	Every 3 Months
High Drywell Pressure	B	Standard Pressure Source	Once/Operating Cycle
High Water Level in Scram Discharge Volume	B	Water Level	Once/Operating Cycle
Low Reactor Water Level	B	Standard Pressure Source	Once/Operating Cycle
Turbine Stop Valve Closure	A	(6)	Refueling Outage
First Stage Turbine Pressure Permissive (PS-5-14(A-D))	A	Pressure Source	Every 6 Months and After Refueling
Main Steam Line Isolation Valve Closure	A	(6)	Refueling Outage

3.6 LIMITING CONDITIONS FOR OPERATION

D. Safety and Relief Valves

1. During reactor power operating conditions and whenever the reactor coolant pressure is greater than 150 psig and temperature greater than 350°F, ~~both~~ safety valves and ~~at least three of the~~ four relief valves shall be operable.

1 all

2. If Specification 3.6.D.1 is not met, initiate an orderly shutdown and the reactor coolant pressure shall be below 150 psig and 350°F within 24 hours.

E. Structural Integrity and Operability Testing

The structural integrity and the operability of the safety-related systems and components shall be maintained at the level required by the original acceptance standards throughout the life of the plant.

4.6 SURVEILLANCE REQUIREMENTS

D. Safety and Relief Valves

1. Operability testing of Safety and Relief Valves shall be in accordance with Specification 4.6.E. The lift point of the safety and relief valves shall be set as specified in Specification 2.2.B.

E. Structural Integrity and Operability Testing

1. Inservice inspection of safety-related components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the NRC.

Inservice inspection of piping, identified in NRC Generic Letter 88-01, shall be performed in accordance with the staff positions on schedule, methods, and personnel and sample expansion included in the Generic Letter or in accordance with alternate measures approved by NRC Staff.

3.7 LIMITING CONDITIONS FOR OPERATION

i. Suspend movement of irradiated fuel assemblies and the fuel cask in secondary containment; and

ii. Suspend core alterations; and

iii. Initiate action to suspend operations with the potential for draining the reactor vessel.

C. Secondary Containment System

1. Secondary Containment Integrity shall be maintained during the following modes or conditions:

a. Whenever the reactor is in the Run Mode, Startup Mode, or Hot Shutdown condition*; or

4.7 SURVEILLANCE REQUIREMENTS

C. Secondary Containment System

1. Secondary containment capability to maintain a 0.15 inch of water vacuum under calm wind (2<ū<5 mph) conditions with a filter train flow rate of not more than ~~1,500~~ 1,550 cfm, shall be demonstrated at least quarterly. 1

* NOTE: The reactor mode switch may be changed to either the Run or Startup/Hot Standby position, and operation not considered to be in the Run Mode or Startup Mode, to allow testing of instrumentation associated with the reactor mode switch interlock functions, provided:

1. Reactor coolant temperature is ≤ 212°F;
2. All control rods remain fully inserted in core cells containing one or more fuel assemblies; and
3. No core alterations are in progress.

Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

C. PRIMARY CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, entitled "Performance Based Containment Leak-Test Program," dated September 1995, as modified by the following:

- The first Type A test after the April 1995 Type A test shall be performed no later than April 2010. (This is an exception to Section 9.2.3 of NEI 94-01, Rev. 0, "Industry Guideline for Implementing Performance-Based Option of 10CFR50, Appendix J.")
- The leakage contributions from the main steam pathways are excluded from the sum of the leakage rates from Type B and C tests specified in (1) Section III.B of 10CFR50, Appendix J - Option B; (2) Section 6.4.4 of ANSI/ANS 56.8-1994; and (3) Section 10.2 of NEI 94-01, Rev. 0.
- The leakage contributions from the main steam pathways are excluded from the overall integrated leakage rate from Type A tests specified in (1) Section III.A of 10CFR50, Appendix J - Option B; (2) Section 3.2 of ANSI/ANS 56.8-1994; and (3) Sections 8.0 and 9.0 of NEI 94-01, Rev. 0.

The peak calculated containment internal pressure for the design basis loss of coolant accident, Pa, is 44 psig.

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Leakage rate acceptance criteria are:

1. Primary containment leakage rate acceptance criterion ≤ 1.0 La.
2. The as-left primary containment integrated leakage rate test (Type A test) acceptance criterion is ≤ 0.75 La.
3. The combined local leakage rate test acceptance criterion for Type B and Type C tests (excluding the leakage contributions from the main steam pathways) is ≤ 0.6 La, calculated on a maximum pathway basis, prior to entering a mode of operation where primary containment integrity is required.
4. The combined local leakage rate test acceptance criterion for Type B and Type C tests (excluding the leakage contributions from the main steam pathways) is ≤ 0.6 La, calculated on a minimum pathway basis, at all times when primary containment integrity is required.

The maximum allowable primary containment leakage rate, La, at Pa, shall be 0.8 % of primary containment air weight per day.

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.

Remove	**Insert**
27	27
120	120
155a	155a
265	265

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