Entergy

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September 22, 2008
BVY 08-052

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

Subject: **Vermont Yankee Nuclear Power Station**
Docket No. 50-271, License No. DPR-28
Technical Specifications Proposed Change No. 278
Changes to Main Steam Isolation Valve Surveillance Requirements

Dear Sir or Madam,

In accordance with 10CFR50.90, Entergy Nuclear Operations, Inc. (Entergy) is proposing to amend Operating License DPR-28 for Vermont Yankee Nuclear Power Station (VY). The proposed change would revise the Operating License Technical Specifications (TS) to remove the requirement to perform quarterly closure time testing of the MSIVs by deleting TS Surveillance Requirement 4.7.D.1.c. Operability testing of the MSIVs will continue to be required by the VY Inservice Test Program.

Entergy has reviewed the proposed amendment in accordance with 10CFR50.92 and concludes it does not involve a significant hazards consideration. In accordance with 10CFR50.91, a copy of this application, with attachments, was provided to the State of Vermont, Department of Public Service.

Attachment 1 provides an evaluation of the proposed TS change. Attachment 2 provides the marked-up version of the appropriate pages of the current TS. Attachment 3 contains the retyped TS pages.

ENO requests review and approval of the proposed license amendment by September 1, 2009 and a 60 day implementation period from the date of the amendment approval.

There are no new regulatory commitments made in this letter.

If you have any questions on this transmittal, please contact Mr. David Mannai at (802) 451-3304.

A001
NRR

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 22, 2008.

Sincerely,

Ted A. Sullivan
Site Vice President
Vermont Yankee Nuclear Power Station

Attachments
1. Evaluation of Proposed Change
2. Markup of the Current Technical Specifications
3. Retyped Technical Specifications

cc: Mr. Samuel J. Collins
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Mr. James S. Kim, Project Manager
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Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Change 278

Evaluation of Proposed Change

I. PURPOSE OF THE PROPOSED CHANGE

The Vermont Yankee Nuclear Power Station (VY) Technical Specification (TS) Surveillance Requirement (SR) 4.7.D.1.c currently requires that Main Steam Isolation Valves (MSIVs) be tripped (one at a time) with reactor power less than 75% to verify closure time on a quarterly basis. The proposed change is to delete this Surveillance Requirement.

MSIV testing requirements and details will continue to be contained in the TS as required by TS SR 4.7.D.1.b. This SR invokes the requirements of TS 4.6.E. This is consistent with Standard Technical Specification SR 3.6.1.3.8 in NUREG-1433.

II. DESCRIPTION OF CHANGES

The proposed license amendment changes Technical Specification (TS) Section 4.7.D for Vermont Yankee Nuclear Power Station (VY) regarding surveillance requirements for the Primary Containment Isolation Valves.

Specifically, the change proposed is:

1) Page 158, Surveillance Requirement (SR) 4.7.D.1.c: This SR is being deleted.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGE

The safety functions of the main steam isolation valves are to limit release of radioactive material by closing the nuclear system process barrier and the primary containment barrier and to limit the loss of reactor cooling water in case of a major steam leak outside the primary containment.

There are four main steam lines. Two isolation valves per line are provided in series in a horizontal run of each main steam line, as close as practical to the primary containment, one inside (inboard) and the other outside (outboard). The valves, when closed, form part of the primary containment barrier for nuclear system breaks inside the containment and part of the nuclear system process barrier for main steam line breaks outside the primary containment. The MSIV closure time setpoint, as specified in the VY UFSAR and VY Technical Requirements Manual Table TRM 4.7.2, is no less than 3 seconds and no greater than 5 seconds.

Operability testing of the MSIVs ensures their capability to perform their safety functions. Following implementation of the proposed change, VY TS SR 4.7.D.1.b will still require operability testing of the MSIVs by reference to VY TS SR 4.6.E, which references the VY Inservice Testing (IST) Program. The MSIV closure time setpoints related to the safety function of the system will continue to be contained in the VY UFSAR and the VY TRM. Changes to the UFSAR and TRM are evaluated per the requirements of 10CFR50.59. These controls are adequate to ensure the required Inservice Testing is performed to verify the MSIVs are operable and capable of performing their safety functions.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

The proposed license amendment changes Technical Specification (TS) Section 4.7.D for Vermont Yankee Nuclear Power Station (VY) regarding surveillance requirements for the Primary Containment Isolation Valves.

Specifically, the change proposed is:

1) Page 158, Surveillance Requirement (SR) 4.7.D.1.c: This SR is being deleted.

Pursuant to 10CFR50.92, Entergy Nuclear Operations, Inc. (ENO) 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 operation of the facility in accordance with the proposed amendment would 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.

The proposed change does not involve a significant hazards consideration because:

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

   This proposed change deletes the specific surveillance requirement to exercise the MSIVs once per quarter from the TS. Following implementation of the proposed change, the VY TS still will require operability testing of the MSIVs by reference to the VY IST program. The quarterly exercise involves a timed full stroke closure of each individual MSIV and subsequent reopening to the full open position. Details of MSIV testing requirements will continue to be contained in the VY IST program. The MSIV closure time setpoint values related to the safety functions of the MSIVs will continue to be contained in the VY UFSAR and the VY TRM. Changes to the VY UFSAR and TRM are evaluated per the requirements of 10CFR50.59. These controls are adequate to ensure the required inservice testing is performed to verify the MSIVs are operable and capable of performing their safety functions. The proposed amendment introduces no new equipment or changes to how equipment is operated. Therefore, the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The operation of Vermont Yankee Nuclear Power Station (VY) 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 amendment deletes the specific surveillance requirement to exercise the MSIVs once per quarter from the TS. Following implementation of the proposed change, the VY TS still will require operability testing of the MSIVs by reference to the VY IST program. The quarterly exercise involves a timed full stroke closure of each individual MSIV and subsequent reopening to the full open position. The proposed amendment does not change the design or function of any component or system. No new modes of failure or initiating events are being introduced. Therefore, operation of VY in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed amendment deletes the specific surveillance requirement to exercise the MSIVs once per quarter from the TS. Following implementation of the proposed change, the VY TS still will require operability testing of the MSIVs by reference to the VY IST program. The quarterly exercise involves a timed full stroke closure of each individual MSIV and subsequent reopening to the full open position. The proposed amendment does not change the design or function of any component or system. The proposed amendment does not involve any safety limits or safety settings. The ability of the MSIVs to perform their safety function will continue to be tested in accordance with the IST Program, through TS SR 4.7.D.1.b.

Since the proposed controls are adequate to ensure the required inservice testing is performed, there will still be high assurance that the components are operable and capable of performing their respective safety functions, and that the systems will respond as designed to mitigate the subject events. Therefore, operation of VY in accordance with the proposed amendment will not involve a significant reduction in the margin to safety.

V. ENVIRONMENTAL CONSIDERATIONS

This amendment request meets the eligibility criteria for categorical exclusion from environmental review set forth in 10CFR51.22(c)(9) as follows:

(i) The amendment involves no significant hazards determination.

As described in Section IV of this evaluation, the proposed change involves no significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

The proposed amendment does not involve any physical alterations to the plant configuration. The proposed change does not affect the operation of the MSIVs in a way that could change the types or significantly increase the amounts of any effluent that may be released offsite.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The MSIVs mitigate the consequences of an accident. The proposed amendment does not involve any physical alterations of the plant configuration. The proposed change does not affect the safety function of the MSIVs. The deletion of the quarterly closure time SR from the TS will not increase individual or cumulative occupational radiation exposure.

Based on the above, VY concludes that the proposed change meets the eligibility criteria for categorical exclusion as set forth in 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

IV. REFERENCES

a) NUREG-1433, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/4," dated March 2004.

Attachment 2

Vermont Yankee Nuclear Power Station

Proposed Change 278

Markup of the Current Technical Specifications and Bases Pages

3.7 LIMITING CONDITIONS FOR OPERATION

D. Primary Containment Isolation Valves

1. During reactor power operating conditions all containment isolation valves and all instrument line flow check valves shall be operable except as specified in Specification 3.7.D.2.

2. In the event any containment isolation valve becomes inoperable, reactor power operation may continue provided at least one containment isolation valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.

3. If Specifications 3.7.D.1 and 3.7.D.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.

4.7 SURVEILLANCE REQUIREMENTS

D. Primary Containment Isolation Valves

1. Surveillance of the primary containment isolation valves should be performed as follows:

   a. The operable isolation valves that are power operated and automatically initiated shall be tested for automatic initiation and closure time at least once per operating cycle.

   b. Operability testing of the primary containment isolation valves shall be performed in accordance with Specification 4.6.E.

   c. ~~At least once per quarter, with the reactor power less than 75 percent of rated, trip all main steam isolation valves (one at a time) and verify closure time.~~ DELETED

2. Whenever a containment isolation valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be logged daily.

Attachment 3

Vermont Yankee Nuclear Power Station

Proposed Change 278

Retyped Technical Specification and Bases Pages

3.7 LIMITING CONDITIONS FOR OPERATION	4.7 SURVEILLANCE REQUIREMENTS
D. Primary Containment Isolation Valves	D. Primary Containment Isolation Valves
1. During reactor power operating conditions all containment isolation valves and all instrument line flow check valves shall be operable except as specified in Specification 3.7.D.2.	1. Surveillance of the primary containment isolation valves should be performed as follows: a. The operable isolation valves that are power operated and automatically initiated shall be tested for automatic initiation and closure time at least once per operating cycle. b. Operability testing of the primary containment isolation valves shall be performed in accordance with Specification 4.6.E. c. Deleted
2. In the event any containment isolation valve becomes inoperable, reactor power operation may continue provided at least one containment isolation valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.	2. Whenever a containment isolation valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be logged daily.
3. If Specifications 3.7.D.1 and 3.7.D.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.	