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David J. Mannai  
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BVY 09-055

September 28, 2009

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

SUBJECT: Revision of Technical Specifications Bases Page  
Vermont Yankee Nuclear Power Station  
Docket No. 50-271  
License No. DPR-28

Dear Sir or Madam:

This letter provides a revised Vermont Yankee Technical Specification (TS) Bases page. The Vermont Yankee TS Bases were revised to update the diesel fuel oil testing standard contained in TS Bases 4.10.C from ASTM D975-02 to the current testing standard, ASTM D975-09.

These changes, processed in accordance with our Technical Specification Bases Control Program (TS 6.7.E), were determined not to require prior NRC approval. The revised Bases page is provided for your information and for updating and inclusion with your copy of Vermont Yankee Technical Specifications. No NRC action is required in conjunction with this submittal.

There are no new regulatory commitments being made in this submittal.

Should you have any questions concerning this submittal, please contact me at 802-451-3304.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Mannai".

DJM/PLC

ADD  
NRR

Attachment: 1. Revised Technical Specifications Bases Page

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

Mr. James S. Kim, Project Manager  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
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USNRC Resident Inspector  
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Mr. David O'Brien, Commissioner  
VT Department of Public Service  
112 State Street – Drawer 20  
Montpelier, Vermont 05620-2601

Attachment 1

Vermont Yankee Nuclear Power Station  
Revised Technical Specifications Bases Page

BASES: 4.10 (Cont'd)

for the associated batteries. The results of these tests will be logged and compared with the manufacturer's recommendations of acceptability.

The Service Discharge Test (4.10.A.2.c) is a test of the batteries ability to satisfy the design requirements of the associated dc system. This test will be performed using simulated or actual loads at the rates and for the durations specified in the design load profile (battery duty cycle).

Assurance that the diesels will meet their intended function is obtained by periodic surveillance testing and the results obtained from the pump and valve testing performed in accordance with the requirements of Specification 4.6.E. Specification 4.10.B.1.a provides an allowance to avoid unnecessary testing of the operable emergency diesel generator (EDG). If it can be determined that the cause of the inoperable EDG (e.g., removal from service to perform routine maintenance or testing) does not exist on the operable EDG, demonstration of operability of the remaining EDG does not have to be performed. If the cause of inoperability exists on the remaining EDG, it is declared inoperable upon discovery, and Limiting Condition for Operation 3.10.B.1 requires reactor shutdown within 24 hours. Once the failure is repaired, and the common cause failure no longer exists, Specification 4.10.B.1.a is satisfied. If the cause of the initial inoperable EDG cannot be confirmed not to exist on the remaining EDG, performance of Surveillance Requirement (SR) 4.10.B.1.b suffices to provide assurance of continued operability of that EDG.

In the event the inoperable EDG is restored to operable status prior to completing either SR 4.10.B.1.a or SR 4.10.B.1.b, the plant corrective action program will continue to evaluate the common cause possibility. This continued evaluation, however, is no longer under the 24 hour constraint imposed while in the condition of SR 4.10.B.1 or SR 4.10.B.3.b.2.

According to NRC Generic Letter 84-15, 24 hours is a reasonable time to confirm that the operable EDG is not affected by the same problem as the inoperable EDG.

Verification of operability of an off-site power source within one hour and once per eight hours thereafter as required by 4.10.B.3.b.1 may be performed as an administrative check by examining logs and other information to determine that required equipment is available and not out of service for maintenance or other reasons. It does not require performing the surveillance needed to demonstrate the operability of the equipment.

- C. Logging the diesel fuel supply weekly and after each operation assures that the minimum fuel supply requirements will be maintained. During the monthly test for quality of the diesel fuel oil, a viscosity test and water and sediment test will be performed as described in ASTM D975-09. The quality of the diesel fuel oil will be acceptable if the results of the tests are within the limiting requirements for diesel fuel oils shown on Table 1 of ASTM D975-09.