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BVY 10-021

March 31, 2010

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

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

REFERENCES: 1) Letter, USNRC to Entergy, "Vermont Yankee Nuclear Power Station - Issuance of Amendment RE: Revision to Requirements for Inoperable Containment Isolation Valves (TAC NO. ME2267)," NVY 10-007, dated January 26, 2010

Dear Sir or Madam:

This letter provides revised Vermont Yankee Nuclear Power Station (VY) Technical Specification (TS) Bases pages. The TS Bases were revised in conjunction with Amendment No. 242 to the VY Operating License, issued in Reference (1).

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 pages are provided in Attachment 1 for your information and for updating and inclusion with your copy of VY 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 802-451-3150.

Sincerely,

[JMD/JTM]

Attachment: 1. Revised Technical Specification Bases Pages (2 pages)

A001
NRR

cc: Mr. Samuel J. Collins
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Mr. James S. Kim, Project Manager
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VT Department of Public Service
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Montpelier, Vermont 05620-2601

Attachment 1

Vermont Yankee Nuclear Power Station

Revised Technical Specification Bases Pages

(pages 166a and 166b)

BASES: 3.7 (Cont'd)

An alternate electrical power source for the purposes of Specification 3.7.B.1.b shall consist of either an Emergency Diesel Generator (EDG) or the Vernon Hydro tie line. Maintaining availability of the Vernon Hydro tie line as an alternative to one of the EDGs in this condition provides assurance that standby gas treatment can, if required, be operated without placing undue constraints on EDG maintenance availability. Inoperability of both trains of the SGTS or both EDGs during refueling operations requires suspension of activities that represent a potential for releasing radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk.

Use of the SGTS, without the fan and the 7.1 kW heater in operation, as a vent path during torus venting does not impact subsequent adsorber capability because of the very low flows and because humidity control is maintained by the standby 1 kW heaters, therefore operation in this manner does not accrue as operating time.

D. Primary Containment Isolation Valves

The primary containment design includes lines that penetrate the primary containment with different containment isolation valve configurations including double and single valve isolation. Automatic initiation is required to minimize the potential leakage paths from the containment in the event of a loss-of-coolant accident. These lines typically include additional automatic valves or manual maintenance isolation valves, close to the containment boundary, that can serve as interim isolation devices while repairs to a containment isolation valve are made. Isolation using at least one closed de-activated automatic valve, closed manual valve, or blind flange in each line is sufficient to maintain the integrity of the primary containment. The selected isolation device should be the closest available device to the primary containment.

E. Reactor Building Automatic Ventilation System Isolation Valves (RBAVSIVs)

The function of the RBAVSIVs, in combination with other accident mitigation systems, is to limit fission product release during and following postulated Design Basis Accidents (DBAs). The operability requirements for RBAVSIVs help ensure that an adequate secondary containment boundary is maintained during and after an accident by minimizing potential paths to the environment. The RBAVSIVs must be operable (or the penetration flow path isolated) to ensure secondary containment integrity and to limit the potential release of fission products to the environment. The valves covered by this Limiting Condition for Operation are included in the Inservice Testing Program.

In the event that there are one or more RBAVSIVs inoperable, the affected penetration flow path(s) must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. The required action must be completed within the eight hour or four hour completion time, as applicable. The specified time periods are reasonable considering the time required to isolate the penetration, and the probability of a DBA occurring during this short time.

BASES: 3.7 (Cont'd)

If any required action or completion time cannot be met as a result of one or more inoperable RBAVSIVs, the plant must be placed in a mode or condition where the Limiting Condition for Operation does not apply. To achieve this status during reactor power operation, the reactor must be brought to at least hot shutdown within 12 hours and to cold shutdown within 36 hours. If applicable, core alterations and the movement of irradiated fuel assemblies and the fuel cask in the secondary containment must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be immediately initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

4.7 STATION CONTAINMENT SYSTEMS

A. Primary Containment System

The interiors of the drywell and suppression chamber are painted with an inorganic zinc primer to prevent rusting that could lead to degradation of the containment pressure boundary. The inspection of the painted surfaces as part of inservice inspection under 10 CFR 50.55a(b)(2)(vi) assures that the paint and the underlying base metal have not degraded. Experience with this type of coating during plant operating cycles between 1972 and the present indicates that this inspection methodology and interval are adequate.

Because of the large volume and thermal capacity of the suppression pool, the level and temperature normally changes very slowly and monitoring these parameters daily is sufficient to establish any temperature trends.

The average temperature is determined by taking an arithmetic average of OPERABLE suppression pool water temperature channels. The daily frequency has been shown, based on operating experience, to be acceptable. The frequencies are further justified in view of other indications available in the Control Room, including alarms, to alert operators to an abnormal condition.

When heat is being added to the suppression pool by testing, however, it is necessary to monitor suppression pool temperature more frequently. The 5 minute frequency during testing is justified by the rate at which tests will heat up the suppression pool. This has been shown to be acceptable based on operating experience, and provides assurance that allowable pool temperatures are not exceeded.

The requirement for an external visual examination following any event where potentially high loadings could occur provides assurance that no significant damage was encountered. Particular attention should be focused on structural discontinuities in the vicinity of the relief valve discharge since these are expected to be the points of highest stress. Visual inspection of the suppression chamber including water line regions each refueling outage is adequate to detect any changes in the suppression chamber structures.