VERMONT YANKEE
NUCLEAR POWER CORPORATION

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REPLY TO
ENGINEERING OFFICE
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October 16, 1989

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, Sample Technical Specification, dated 12/2/76

Dear Sir:

Subject: Proposed Change to Vermont Yankee Technical Specifications: Compensatory Fire Watches

Pursuant to the Commission's Rules and Regulations as set forth in 10CFR50.90, Vermont Yankee Nuclear Power Corporation (VYNPC) hereby proposes the following change to Appendix A of the Vermont Yankee plant operating license [Reference a)].

PROPOSED CHANGE

Replace page 187-g of the Vermont Yankee Technical Specifications with the attached revised page 187-g. The proposed change revises section 3.13.D.2 pertaining to the establishment of compensatory fire watches. Specifically, this proposed change will reduce the frequency of the fire watch from continuous to not less than once per hour provided the appropriate fire detection system is operable. This proposed change provides compensatory measures determined to be adequate and practical and ensures consistency with other compensatory measures directed by Technical Specifications in Section 3.13.D.

REASON AND BASIS FOR CHANGE

The fire protection Technical Specifications at Vermont Yankee were developed using the sample fire protection Technical Specifications provided to VY by the NRC in 1976 (b). At that time, redundant motor control centers and cables necessary to support safe shutdown were contained in, or passed through, the cable spreading area or the switchgear room. This configuration was determined acceptable with a Technical Specification requirement for a continuous fire watch should the CO_2 system become inoperable.

Modifications were later made to satisfy new Appendix R regulations. Control and power equipment for dedicated safe shutdown equipment was provided and protected in areas of the plant independent of the cable spreading area. The switchgear room was divided by a rated fire barrier providing separation of independent trains of safe shutdown equipment.

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The Cable Vault and Switchgear Rooms are now separated from other safe shutdown areas by one hour rated fire barriers. These rooms have independent detection and suppression systems.

These additional modifications and dedicated safe shutdown equipment provide assurance of safe shutdown capability independent of a total loss, due to fire, of the cable spreading area or either of the switchgear rooms.

The ionization detection systems which trip, and provide alarms for, the cable vault and switchgear room CO_2 systems exceed the capabilities of a continuous fire watch. The basis for the Fire Protection System's Technical Specifications state, in part, that the smoke detectors provide the early warning fire detection capability necessary to detect fires in these areas of the plant. These systems alarm locally and remotely in the control room. Appropriate firefighting equipment is readily available and located in all of these areas. The availability of the fire detection system will ensure quick response if any alarm condition occurs.

This proposed change will modify the requirement from a continuous fire watch to a not less than once per hour fire watch in the event of an inoperable cable vault or switchgear room CO_2 system provided the corresponding detection system is operable. Considering the improved design which enhances the availability of redundant equipment for safe shutdown, the acceptability of a total loss due to fire in the cable spreading area or a switchgear room, and the presence of an operable detection system; the change to an hourly fire watch will have no significant impact upon plant safety or operations. The compensatory measures (3.13.D.2) described in the proposed Technical Specification change are, therefore, determined to be appropriate. This change will also provide consistency throughout Vermont Yankee's Fire Protection Technical Specifications for inoperable fire suppression equipment reflecting current plant design.

SAFETY CONSIDERATIONS

This proposed change in the frequency of the compensatory fire watch is an administrative action. As such, there are no unreviewed safety questions as defined by 10CFR50.59.

This change has been reviewed by the Vermont Yankee Plant Operations Review Committee, and by the Nuclear Safety Audit and Review Committee.

SIGNIFICANT HAZARDS CONSIDERATION

10CFR50.92 states that a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not: (i) involve a significant increase in the probability or consequences of an accident previously evaluated; (ii) create the possibility of a new or different kind of accident from any accident previously evaluated; or (iii) involve a significant reduction in a margin of safety.

This proposed change provides consistency in the application of compensatory measures for inoperable fire suppression systems at Vermont Yankee. This change, therefore, does not significantly increase the probability or consequences of an accident previously evaluated because the change is administrative and does not weaken or degrade the facility. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the change is administrative and ensures that the plant does not exceed the applicable safety limits. The proposed change does not involve a significant reduction in a safety margin since the change is administrative and does not involve any physical change to the facility.

SCHEDULE OF CHANGE

This change to the Vermont Yankee Technical Specifications will be implemented as soon as practicable following receipt of your approval.

We trust that the information provided above adequately supports our request; however, should you have any questions or desire further information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Warren P. Murphy
Vice President and
Manager of Operations

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cc: USNRC Regional Administrator, Region I
USNRC Resident Inspector, VYNPS
Vermont Department of Public Service

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Warren P. Murphy, who, being duly sworn, did state that he is Vice President and Manager of Operations of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation and that the statements therein are true to the best of his knowledge and belief.

DIANE M. McCUE
NOTARY PUBLIC
WINDHAM COUNTY, VERMONT

Diane M. McCue Notary Public
My Commission Expires February 10, 1991