VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

RUTLAND, VERMONT 05701

REPLY TO:
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WESTBORO, MASSACHUSETTS 01581
TELEPHONE 617-366-9011

B.3.2.1
WVY 80-131

50-271

September 12, 1980

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Office of Nuclear Reactor Regulation

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) USNRC Letter to All Boiling Water Reactor Licensees dated July 2, 1980

Subject: Technical Specifications for TMI Lessons Learned Category "A" Items

Dear Sir:

Pursuant to Section 50.59 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following changes to the Technical Specifications.

PROPOSED CHANGE:

- Tables 3.2.6 and 4.2.6 are revised to incorporate conditions for operation and surveillance requirements for safety and relief valve position monitoring instrumentation.

- Table 6.1.1 is revised to include the Shift Technical Advisor (STA) in the minimum shift crew composition. Section 6.1 is revised to specify the minimum qualification requirements for the STA.

REASON FOR CHANGE:

Reference (b) transmitted model standard technical specifications which were intended to provide guidance in the scope and types of specifications required to assure that facility operation is maintained within acceptable limits following implementation of the TMI-1 Lessons Learned Category "A" items. Using the NRC's model technical specifications as guidance, we have determined that certain revisions to Vermont Yankee Technical Specifications are appropriate. These revisions are identified above and in the attached technical specification pages.

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BASIS FOR CHANGE:

The addition of valve position indication instrumentation requirements to the technical specifications will provide reasonable assurance that the system will be available as a diagnostic aid to the operator when required. It is the opinion of the licensee that this indication is an operator aid and is not related to the safe operation of the plant. Therefore, limiting conditions for operation are not necessary.

Changes are proposed to specify minimum STA qualifications and requirements to ensure that a knowledgeable individual is available to enhance the plant operating staff's capabilities for responding to off-normal conditons and for evaluating operating experience.

SAFETY CONSIDERATIONS:

The safety and safety/relief valve position monitoring systems were installed at Vermont Yankee in February, 1980. It was concluded that the changes did not present significant hazards not described or implicit in the safety analysis report, and did not involve an unreviewed safety question as described in 10CFR50.59.

The proposed technical specifications will ensure that appropriate equipment and administrative requirements are applied.

Incorporation of STA qualifications and requirements is administrative in nature.

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

FEE DETERMINATION:

This proposed change requires an approval that involves a single safety issue and is deemed not to involve a significant hazards consideration. For these reasons, Vermont Yankee Nuclear Power Corporation proposes this change as a Class III Amendment. A payment of $4,000.00 is enclosed.

SCHEDULE OF CHANGE:

Tables 3.2.6 and 4.2.6 changes described above will be incorporated into the Vermont Yankee Technical Specifications upon receipt of your approval. Section 6.1 and Table 6.1.1 changes described above will be incorporated into the Vermont Yankee Technical Specifications upon completion of the Shift Technical Advisor Training Program (expected during May or June, 1981), and receipt of your approval.

We trust you will find this information satisfactory; however, should you desire additional information, feel free to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

L. H. Heider
Vice President

COMMONWEALTH OF MASSACHUSETTS)
)ss
COUNTY OF WORCESTER)

Then personally appeared before me, L. H. Heider, who, being duly sworn, did state that he is a Vice President of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing request 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.

Robert H. Groce Notary Public
My Commission Expires September 14, 1984

TABLE 3.2.6

POST-ACCIDENT INSTRUMENTATION

Minimum Number of Operable Instrument Channels	Parameter	Type of Indication	Instrument Range
2	Drywell Atmospheric Temperature (Note 1)	Recorder #16-19-45 Recorder #TR-1-149	0-300°F 0-300°F
2	Drywell Pressure (Note 1) Torus Pressure (Note 1)	Recorder #16-19-44	0-80 psia 0-80 psia
2	Torus Water Level (Note 3)	Meter #16-19-46A Meter #16-19-46B	0-3 ft. 0-3 ft.
2	Torus Water Temperature (Note 1)	Meter #16-19-48	60-180°F
2	Reactor Pressure (Note 1)	Recorder #6-97 Meter #6-90A Meter #6-90B	0-1200 psig 0-1200 psig 0-1200 psig
2	Reactor Vessel Water Level (Note 1)	Meter #2-3-91A Meter #2-3-91B	(-150)-0-(+150)"H_2O (-150)-0-(+150)"H_2O
1	Control Rod Position (Note 1,2)	Meter	0-48" RPIS
1	Neutron Monitor (Note 1,2)	Meter	0-125% Rated Flux
1	Torus Air Temperature (Note 1)	Recorder #16-19-45	0-300°F
NA	Safety/Relief Valve Position from pressure switches	Lights (SRV 2-71-A through D)	Closed - Open
NA	Safety Valve Position from Accoustic Monitor	Meter ZI-2-1A/B	Closed - Open