

YANKEE ATOMIC ELECTRIC COMPANY

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November 22, 1989

BYR 89-169

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) USNRC Letter to Yankee, Generic Letter 84-13, dated May 3, 1984
(c) Yankee Letter to USNRC, dated March 21, 1989
(d) Yankee Letter to USNRC, dated April 14, 1989
(e) USNRC Letter to Yankee, dated September 1, 1989

Subject: Incorporation of Generic Letter 84-13 into Yankee Nuclear Power
Station's Technical Specifications (Proposed Change 218, Revision 1)

Dear Sir:

Pursuant to Section 50.90 of the Commission's rules and regulations, Yankee hereby requests the authorization to make the following changes.

Proposed Change

Reference is made to the Technical Specifications of License Number DPR-3 of the Yankee Nuclear Power Station (YNPS). We propose to modify the Technical Specifications as described below:

1. Technical Specification Page 3/4 7-27
 - o Modify LCO 3.7.9 to use the wording provided in Generic Letter 84-13.
 - o Modify Surveillance 4.7.9.a to remove the reference to Table 3.7.4.
2. Technical Specification Page 3/4 7-29
 - o Modify Surveillance 4.7.9.c to use wording provided in Generic Letter 84-13.
3. Technical Specification Page 3/4 7-29a
 - o Modify Surveillance 4.7.9.e to remove the reference to Table 3.7.4.
4. Technical Specification Pages 3/4 7-29b, c, and d
 - o Remove Table 3.7.4 from the Technical Specifications.

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5. Technical Specification Page B 3/4 7-6
 - o Modify Bases Section 3/4.7.9 to remove sentence now contained in LCO 3.7.9.
6. Technical Specification Page 6-24
 - o Modify Section 6.10.2.n to remove the reference to Table 3.7.4.

The revised Technical Specification pages are provided in Attachment B to this letter.

Description of Change

This change incorporates into Yankee's Technical Specifications wording from Generic Letter 84-13 which allows the removal of Table 3.7.4.

Reason and Basis for Change

Yankee, during our November 1988 refueling outage, added a snubber to our pressurizer drain line. In Reference (c), we provided the NRC with a proposed change to YNPS's Technical Specifications which updated Table 3.4.7, "Safety-Related Mechanical Snubbers," to list the new snubber. The NRC, after their initial review of this proposed change, suggested to Yankee that YNPS's Technical Specifications be updated to include the guidance provided in Generic Letter 84-13, Reference (b). Yankee agreed to this as noted in Reference (e).

The NRC, in Generic Letter 84-13, "Technical Specification for Snubbers," reassessed the inclusion of snubber listings within the Technical Specifications. The letter concluded that such listings are not necessary, provided the snubber Technical Specification is modified to specify which snubbers are required to be operable. The generic letter noted that this modification did not alter the Technical Specifications' requirements for record keeping or the need for 10CFR50.59 evaluations for changes in snubber quantities, types, or location. Attached to the generic letter was specific guidance to licensees as to the changes necessary to remove the snubber listing from the Technical Specifications.

This revised proposed change incorporates into Yankee's Technical Specification wording from Generic Letter 84-13 and removes the snubber list contained in Table 3.4.7. This snubber list will now be contained in YNPS Operating Procedure No. 4520. This procedure fulfills all the requirements of Technical Specifications 4.7.9.e and 6.10.2.n.

Safety Considerations

This change is requested to incorporate into Yankee's Technical Specifications guidance contained in Generic Letter 84-13. The change is classified as administrative in that only the location of the list is modified. All of the other requirements for snubber operability remain in place. As such, this proposed change would not:

ATTACHMENT A

Proposed Change Synopsis

SUMMARY

This change incorporates into Yankee's Technical Specifications wording from Generic Letter 84-13 which allows the removal of snubber listings within the Technical Specifications.

DISCUSSION

Yankee, during our November 1988 refueling outage, added a snubber to our pressurizer drain line. In Reference (c), we provided the NRC with a proposed change to YNPS's Technical Specifications which updated Table 3.4.7, "Safety-Related Mechanical Snubbers," to list the new snubber. The NRC, after their initial review of this proposed change, suggested to Yankee that YNPS's Technical Specifications be updated to include the guidance provided in Generic Letter 84-13, Reference (b). Yankee agreed to this as noted in Reference (e).

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CONCLUSION

This change incorporates into Yankee's Technical Specifications wording from Generic Letter 84-13 which allows the removal of Table 3.7.4. Based on the considerations contained herein, it is concluded that there is reasonable assurance that operation of YNPS, consistent with this proposed Technical Specification, will not endanger the health and safety of the public. Therefore, this proposed change should be approved.