

## YANKEE ATOMIC ELECTRIC COMPANY



20 Turnpike Road Westborough, Massachusetts 01581

October 22, 1980

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation

References: (a) License No. DPR-3 (Docket No. 50-29)  
(b) YAEC Letter to USNRC dated August 26, 1980

Attachment: (1) Revised Technical Specification Pages: 3/4 4-28,  
3/4 4-32, 3/4 4-34 and 3/4 5-8

Dear Sir:

Subject: Deferment of Certain Technical Specification Surveillances

Pursuant to communications with the Commission as delineated in Reference (b) and Section 50.59 of the Commission's Rules and Regulations, the Yankee Atomic Electric Company hereby requests the authorization to make the following changes to the Operating License:

### PROPOSED CHANGE:

Reference is made to Yankee Rowe Operating License No. DPR-3. We propose to modify the license as follows:

Appendix A, Technical Specifications:

- A. Replace pages 3/4 4-28, 3/4 4-32, and 3/4 4-34 of Section 3/4 4 with the attached revised pages of 3/4 4-28, 3/4 4-32 and 3/4 4-34.
- B. Replace page 3/4 5-8 of Section 3/4 5 with the attached page 3/4 5-8.

### REASON FOR CHANGE:

Our letter of August 26, 1980 (Reference (b)) requested deferment of certain surveillance requirements. In subsequent phone discussions, it was determined by the staff that deferment could only be granted through a temporary technical specification change. The enclosed proposed change is in response to this determination.

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As mentioned in Reference (b), the surveillance testing is normally performed during refueling outages when the main coolant system is normally opened. Since the main coolant system has remained closed during our turbine repair effort, performance of these surveillances would require an additional opening of the main coolant system and would significantly increase operator exposure performing these tests.

Our concern is that personnel exposure, as a result of these items, is normally incurred only during refueling outages. Our commitment to the ALARA philosophy requires us to make this request in order that personnel exposures be minimized and that our surveillance schedule remain on a refueling basis.

BASIS FOR CHANGE:

The change to the requirements in the Yankee Rowe Technical Specifications is intended to comply with the USNRC's and Yankee's commitments to the minimizing of personnel radiation exposure.

SAFETY CONSIDERATIONS:

The proposed changes to the Yankee Rowe Technical Specifications provides reasonable assurance that the facility is maintained within the limits determined acceptable. It was concluded that the changes did not present an unreviewed safety question as described in 10 CFR 50.59.

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

FEE DETERMINATION:

This proposed change is administrative in nature and has no safety or environmental significance. For these reasons, Yankee Atomic Electric Company proposes this change as a Class II Amendment. A payment of \$1,200.00 is enclosed.

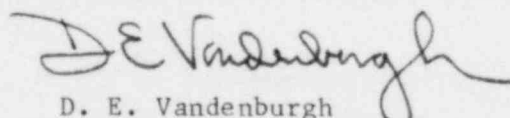
SCHEDULE OF CHANGE:

The changes described above will be incorporated into the Yankee Rowe Technical Specifications upon receipt of your approval.

We trust you will find this information satisfactory; however, should you have any questions relative to this matter, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

  
D. E. Vandenberg  
Senior Vice President

