



VERMONT YANKEE NUCLEAR POWER CORPORATION

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B.3.2.1
FVY 81-5

January 5, 1981

REPLY TO:
ENGINEERING OFFICE
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United States Nuclear Regulatory Commission
Washington, D. C. 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
 - (c) Letter, VYNPC to USNRC dated September 12, 1980; Proposed Change No. 91
 - (d) Letter, USNRC to VYNPC, dated December 1, 1980
 - (e) Letter, USNRC to VYNPC, dated December 10, 1980
 - (f) Letter, VYNPC to USNRC, dated January 8, 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:

Table 3.2.6 is revised to incorporate limiting conditions for operation (LCO's) for safety and relief valve position monitoring instrumentation. Revised pages 49 and 49a are attached and are intended to supercede pages 49 and 49a previously submitted with Reference (c). Page 215 is revised to incorporate requirements for programs concerning integrity of systems outside containment and iodine monitoring.

Reason and Basis for Change:

Reference (c) proposed the addition of safety and relief valve position indication instrumentation requirements to the Technical Specifications. That Reference also stated that this indication was an operator aid and was not related to the safe operation of the plant, therefore LCO's were not necessary. Reference (d) responded to Reference (c) stating that the NRC believed that Vermont Yankee's Technical Specifications should contain LCO's pertaining to the instrumentation in question. Vermont Yankee still believes that the proposed LCO's are unnecessary, however, we feel that our best course of action at this time is to comply with the commission's request. The changes to page 215 of the Technical Specifications is made at the NRC's request as stated in Reference (e).

Section 6.10 on page 215 supercedes Item 2.1.6.a of Reference (f).

Safety Considerations

The safety considerations applicable to this change are contained in Reference (c).

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