Proposed Change No. 91 Supplement 1

REPLY TO

ERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

RUTLAND, VERMONT 05701

B.3.2.1

FVY 81-5

January 5, 1981

ENGINEERING OFFICE

1671 WORCESTER ROAD FRAMINGHAM, MASSACHUSETTS 01701 TELEPHONE 617-872-8100

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

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

Fee Determination

The fee determination contained in Reference (c) applies to this change. A fee payment of \$4000.00 has already been submitted with that Reference.

Schedule of Change

The changes described above will be incorporated into the Vermont Yankee Technical Specifications upon 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

Weider

L. H. Heider Vice President

COMMONWEALTH OF MASSACHUSETTS)

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.

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

