

VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

RUTLAND, VERMONT 05701

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD FRAMINGHAM, MASSACHUSETTS 01701 TELEPHONE 617-672-8100

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

Attention: Office of Nuclear Reactor Regulation

P. C. No. 81 Supplement 1

2.C.15.1

References:

- (a) License No. DPR-28 (Docke: 50-271).
- (b) Vermont Yankee Proposed Change No. 98 (FVY 81-128), dated September 2, 1981.
- (c) General Electric Company, "LOCA Analysis Report for Vermont Yankee Nuclear Power Station," NEDO-21697, August 1977.
- (d) Amendment No. 41, November 30, 1977.
- (e) Amendment No. 57, August 22, 1980.
- (f) Performance Appraisal Inspection Transcript; Exit Meeting, May 1, 1981

Subject: Reload 8 Licensing Submittal, Additional Information.

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 Appendix A of the Operating License.

PROPOSED CHANGE:

The changes are described on Attachment 99-S-1. Revised pages are attached.

REASON FOR CHANGE:

In general the changes incorporate additional information on limits for operation for applicable fuel types and update the technical specifications per previous commitments or discussions.

Tables 3.11-1B, -1E, and -1G, "MAPLHGR VERSUS AVERAGE PLANAR EXPOSURE" for fuel types 8D219, 8D274 (High Gd), and 8DPB289/P8DPB289, respectively, are amended to extend the upper bound of average planar exposure above 30,000 MWd/t. This provides ranges of exposures consistent with anticipated operation for each fuel type.

In addition to the changes described above, the change to Table 3.2.1 is intende' to correct a typographical error to the trip level setting nomenclature for the High Reactor Pressure trip function. The existing table erroneously contains a "greater than or equal to" rather than the proper "less than or equal to" symbol. All appropriate individuals, including the NRC Project Manager, have been made aware of the error; further, administrative controls have been effected to ensure that the applicable plant procedure contains the correct setting. 8111240669 811113

PDR ADDCK 0500027

November of 31, 1981

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The change to page 197, Specification 6.2.8.5.c, is proposed as a result of a Performance Appraisal Branch recommendation (Reference (f)), i.e., that "consideration should be given to adopting the words in this portion of the standard technical specification which would more clearly indicate that the NSAR committee review is not required prior to implementation."

BASIS FOR CHANGE:

The specifications for Limiting Conditions for Operation under Section 3.11.A, Average Planar Linear Heat Generation Rate (APLHGR), are modified to incorporate results over an extended range of average planar linear heat generation rate for currently applicable fuel types. The additional results of Maximum Average Planar Linear Heat Generation Rate (MAPLHGR), Peak Cladding Temporature (PCT), and Oxidation Fraction versus exposure were transmitted in the attached Errata and Addenda notice for the approved licensing topical report, Reference (c). These MAPLHGR limits are established to assure conformance with 10CFR50.46. The limits over an extended range of burnup were calculated using the same approved ECCS evaluation models that were used to calculate the current limits and which were previously reviewed and approved by the NRC (Reference (d)). Extensions of the limits' range to the same burnup level for other fuel types in Vermont Yankee were previously reviewed and approved by the NRC (Reference (e)).

The DEFINITIONS section provides for a uniform interpretation of the specifications. The definition for "Peaking Factor" is no longer required since peaking factor is no longer addressed as a limiting parameter in the Technical Specifications.

The change to Table 3.2.1 will correct a previously identified typographical error.

As stated above, the change to Specification 6.2.B.5.c is based on a recommendation made by the Performance Appraisal Branch following their inspection of Vermont Yankee.

SAFETY CONSIDERATIONS:

None of the changes are deemed to involve significant unreviewed safety questions.

Since the revised MAPLHGR limits are based on the approved ECC3 evaluation models and conform to the requirements of 10CFR50.46, no unreviewed safety questions are involved.

The change to delete the definition of "Peaking Factor" is administrative in nature as are the changes to Table 3.2.1 and Specification 6.2.8.5.c.

This submittal has been reviewed by the Vermont Yarkee Nuclear Safety Audit and Review Committee.

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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 was forwarded with Reference (b).

SCHEDULE OF CHANGE:

This proposed change supplement should be approved before November 29, 1981, which is the currently planned startup date for Cycle 9.

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

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

L. H. Heider Vice President

LHH/jg

Attachments

COMMONWEALTH OF MASSACHUSETTS)

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MIDDLESEX COUNTY

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

