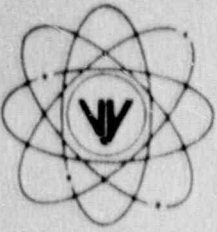


VERMONT YANKEE NUCLEAR POWER CORPORATION



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BVY 90-068

REPLY TO:
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June 1, 1990

U.S. Nuclear Regulatory Commission
Washington, D.C. 20535

Attention: Document Control Desk

References: (See Attachment 1)

Dear Sir:

Subject: Proposed Change #161 to Vermont Yankee Operating License and Technical Specifications to Correct Several Typographical and Format Inconsistencies

Pursuant to the provisions of 10CFR, Part 50, Section 50.90, Vermont Yankee Nuclear Power Corporation hereby proposes the following changes to the Facility Operating License and Appendix A thereof.

Proposed Change

1. In license paragraph 3.E.1, delete "(See Appendix B Technical Specification Section 1.1.A.6)".
2. Delete license paragraph 3.E.2 in its entirety and renumber subsequent paragraphs 3.E.3 through 3.E.14 as 3.E.2 through 3.E.13.
3. In license paragraph 3.E.9, as currently numbered, delete reference to Appendix A, paragraph 3.8.B.2, and replace with reference to Appendix A, paragraph 3.8.A.1.
4. In license paragraph 3.E.9, as currently numbered, reword second sentence which incorrectly references Appendix A, paragraph 3.1.F.1.b to read "Vermont Yankee will also notify MDPH in writing within 30 days following the release of radioactive materials in liquid effluents in excess of 10 percent of the limit set forth in the facility Technical Specifications, Appendix A, paragraph 3.8.A.1."
5. In license paragraph 3.E.13, as currently numbered, delete "staisfactory" and replace with "satisfactory".
6. Delete license paragraph 3.I.
7. In Appendix A, Table 3.2.1, Emergency Core Cooling System Actuation Instrumentation (page 35), change "High Sparger Pressure \leq 5 psig" to read "High Sparger Pressure \leq 5 psid."

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U.S. Nuclear Regulatory Commission
June 1, 1990
Page 2

8. In Appendix A, Table 3.2.5, Control Rod Block Instrumentation (page 47), delete reference to Note 1 in column heading.
9. In Appendix A, Table 3.2.5 Notes (page 48), in note 8, change "...condition without one hour..." to read "...condition within one hour."
10. In Appendix A, Table 3.2.6 Notes (page 49b), in note 5, change meter number from "Meter #16-19-29A or B" to read "Meter #16-19-12A or B."
11. In Appendix A, Specification 4.6.B.1.a (page 106), change sample time from "...every 36 hours..." to read "...every 96 hours...."
12. In Appendix A, delete Table 4.6.1 (pages 112, 113, 114, 115, 115a) in its entirety.
13. In Appendix A, Table 4.7.2.a, Primary Containment Isolation Valves - Valves Subject to Type C Leakage Tests (page 135) for "Main Steam Line Drain (2-74, 2-77)", change number Outboard from "2" to "1".
14. In Appendix A, Bases 4.7.A (continued) (page 142), change third sentence in second paragraph on page 142 from "The resultant dose that would occur over a 30-day period" to read "The resultant doses that would occur for the duration of the accident at the low population distance of 5 miles are lower than those stated due to the variability of meteorological conditions that would be expected to occur over a 30-day period."
15. In Appendix A, Specification 6.1.D.6 (page 190a), delete "Technical Advisor" and replace with "Engineer".

Reason for Change

1. Appendix B to which the parenthetical reference is made in license paragraph 3.E.1 does not exist, having been deleted by Amendment 56 [Reference b)].
2. By letters dated August 16, 1978 [Reference c)] and February 23, 1979 [Reference d)], Vermont Yankee requested an amendment of the Appendix B Non-Radiological Environmental Technical Specifications proposing to replace the license conditions of Appendix B with the water quality and surveillance requirements that fall within the jurisdiction of the U.S. Environmental Protection Agency and the Vermont Agency of Environmental Conservation. Justification for replacing the limiting conditions for operation (LCO's) and associated monitoring programs with those in the National Pollutant Discharge Elimination System (NPDES) Permit requirements was on the basis that water quality limits were outside the NRC's jurisdiction and authority. On July 3, 1979, NRC concluded that, with the exception of LCO's for chlorine and river flow, the majority of the changes were

U.S. Nuclear Regulatory Commission
June 1, 1990
Page 3

justified [Reference e)]. Subsequently on February 22, 1980, Reference b) concluded that LCO's relating to the protection of aquatic ecology, including those for chlorine and river flow, should be removed as a matter of law, and issued Amendment No. 56 to the Facility Operating License.

The subject limits were thus removed from the Technical Specifications; however, we believe that due to an oversight the reference in the body of the license (paragraph 3.E.2) was not also removed.

3. By letter dated January 23, 1984 [Reference f)], Vermont Yankee proposed modification to Appendix A of the Operating License to incorporate the Radiological Effluent Technical Specifications (RETS) in direct response to the NRC's request that Vermont Yankee amend its Operating License (No. DPR-28) as discussed in References g) and h). The proposed Technical Specifications addressed issues put forth by the NRC in their Draft Radiological Technical Specification (NUREG-0472/0473), and were intended to implement the following Federal Regulations: 10CFR Part 50, Sections 50.34a and 50.36a; 10CFR Part 20; 10CFR Part 50, Appendix I; General Design Criteria 60 and 64; 40CFR Part 190. By Reference i), the Commission issued Amendment 83 to Facility Operating License No. DPR-28 consisting of changes to the Technical Specifications in response to the January 23, 1984 application.

Included in the modifications of Amendment 83 were revisions to Specifications 3.8.A and 3.8.B, addressing "Concentration" and "Dose". Concentration limits formerly addressed in 3.8.B are currently addressed in 3.8.A. In addition, all references to requirements which call for the preparation of information to be in Special Reports or other unique reports required by Specification 3.8.B were removed and addressed in Section 6.7.

The reference in the body of the license (paragraph 3.E.9) to Appendix A, paragraph 3.8.B.2 was apparently never adjusted to reflect the change implemented by Amendment 83 and should be corrected to reflect the appropriate current reference, namely paragraph 3.8.A.1.

4. In addition, paragraph 3.E.9 of the body of the license makes reference to Appendix A, paragraph 3.1.F.1.b as relates to an administrative limit for radioactive materials in liquid effluents. Paragraph 3.1.F.1.b does not exist, nor do we find any indication that such a numbered paragraph ever did exist; however, paragraph 3.8.F.1.b did at one time exist and did refer to an administrative limit for radioactive effluent. It appears then that this was an early typographical error which was never corrected. In any case, it is irrelevant as paragraph 3.8.F.1.b no longer exists having been deleted in a general rewrite of the Technical Specifications in 1973/1974 and issued as changes 13, 15, and 17. The second sentence of paragraph 3.E.9 was never corrected to reference an appropriate corresponding Appendix A limit which would require reporting.

U.S. Nuclear Regulatory Commission
June 1, 1990
Page 4

- Since the referenced administrative limits no longer exist, we believe the entire sentence should be rewritten, equivalent to its original intent, referencing a currently applicable Appendix A limit. Note that 10 percent of the limit specified in Appendix A paragraph 3.8.A.1 equates to 10 times the administrative limit formerly set forth in paragraph 3.8.F.1.b, that value being 1 percent of the limit formerly in paragraph 3.8.B.2 and which is now specified in paragraph 3.8.A.1.
5. The misspelling of the word satisfactory is a typographical error of undetermined origin which should be corrected.
 6. Amendment 53 [Reference j)] granted an exemption from the provisions of 10CFR50.55(a) as relates to inservice inspection extending the date for conformance by six months from July 30, 1979 to January 30, 1980. This exemption expired 10 years ago and license paragraph 3.I is therefore no longer relevant. We propose deletion of paragraph 3.I to eliminate this superfluous material.
 7. This is a typographical error which occurred in preparation of this page for Proposed Change No. 134, subsequently issued as Amendment 110 [Reference k)]. Amendment 110 did not make any change to the High Sparger Pressure item and "psid" should have been retained.
 8. Proposed Change No. 103 and the resulting Amendment No. 76 [Reference l)] removed reference to Note 1 from the column heading on page 47 and instead specified the applicable notes in the left hand page margin. This was done in part because Note 1 did not apply to the rod block monitor trip function. The page 47 issued with Amendment No. 90 [Reference m)] (Proposed Change No. 127), reinserted "Note 1" in the column heading. The reinsertion is believed to be an error which was probably caused by using an outdated word processing file when developing Proposed Change 127 for submission. A review of Proposed Change No. 127 and Amendment 90 indicates that the addition of "Note 1" to the column heading was not specifically addressed in either the submittal or the NRC's review of the change.
 9. This is a typographical error which occurred when Note 5 was revised and expanded for Amendment 90 [Reference m)] which necessitated retyping of the page.
 10. Amendment 113 [Reference n)] revised Table 3.2.6. Part of this revision included a corrective update to correct the identification numbers for the containment pressure indicating instruments which had previously been incorrectly identified with their associated transmitter identification number instead of their own identification number. An identical corresponding number correction should also have been made in Table 3.2.6 Note 5 (on the following page) which refers to these same indicating instruments but apparently was missed by oversight.

U.S. Nuclear Regulatory Commission
June 1, 1990
Page 5

11. Amendment 91 [Reference o)] in part revised Specification 3.6.B.1.a. The retying of this page for this revision apparently resulted in a typographical error in Specification 4.6.B.1.a (adjacent to the right of Specification 3.6.B.1.a) which inadvertently changed the "96 hours" to "36 hours." The correct "96 hours" should be restored to this Specification.
12. Amendment 99 [Reference p)] changed the Technical Specifications to require that the in-service examinations of piping, components, and their supports be performed in accordance with 10CFR50.55a(b)2 rather than by an earlier edition of ASME Code Section XI.

Amendment 99, in part, modified Specification 4.6.E to incorporate current criteria and resulted in the elimination of the reference to Table 4.6.1 contained in the pre-amended specification. This amendment as issued, however, failed to specifically delete Table 4.6.1. We believe this was due to an administrative oversight and request that the now obsolete Table 4.6.1 be deleted.

13. This is a typographical error that appeared in Amendment 74 [Reference q)] which granted a one-time use, not to exceed 72 hours, of a manual valve for primary containment isolation while accomplishing repairs. This was apparently the result of retying of the page for this amendment. There is one outboard main steam line drain containment isolation valve as indicated in the specifications prior to Amendment 74, and Table 4.7.2.a should be corrected to reflect this.
14. This is a transcription omission which deleted part of a sentence and appears to have occurred in the 1973/1974 general re-write of the Technical Specifications issued as Changes 13, 15, and 17. The subject sentence as it now stands is an incomplete sentence. Earlier versions contain the complete sentence. Our technical review indicates the original wording (which we propose to restore with a minor grammatical correction in tense, i.e., doses vs dose) to be technically correct.
15. This is a typographical error. Amendment 79 [Reference r)] contained organizational changes which changed the title Shift Technical Advisor to Shift Engineer and also changed the reporting line. This change was reflected in Specification 6.1.D.6 replacing the title Shift Technical Advisor with the title Shift Engineer. In a subsequent amendment, Amendment 87 [Reference s)], the old title Shift Technical Advisor re-appeared. This appears to have been the result of inadvertently accessing an obsolete word processing document in preparing the later Amendment 87.

Safety Consideration

The changes proposed by this amendment request are to correct various administrative errors and inconsistencies in the Technical Specifications and do not present any unreviewed safety questions as defined in 10CFR50.59.

U.S. Nuclear Regulatory Commission
June 1, 1990
Page 6

Significant Hazards Considerations

The Commission has provided standards for determining whether a significant hazards determination exists as stated in 10CFR50.92. A proposed amendment to an operating license involves no significant hazards if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposed changes are to correct various administrative errors and inconsistencies including typographical errors, transcription errors, cross references which no longer apply, and deletion of no longer applicable material obsoleted by prior amendments but which, through oversight, had not been removed.

None of these changes will affect any plant hardware, plant design, safety limit settings, or plant system operation, and therefore do not modify or add any initiating parameters that would significantly increase the probability or consequences of any previously analyzed accident. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously evaluated.

As discussed above, the proposed changes only correct administrative errors and inconsistencies. The proposed changes do not affect any equipment nor do they involve any potential initiating events that would create any new or different kind of accident. As such, the plant initial conditions utilized for the design basis accident analyses remain unchanged and valid. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

As discussed above, the proposed changes which correct administrative errors and inconsistencies, do not affect any equipment involved in potential initiating events or safety limit settings. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

We conclude, therefore, that the proposed changes do not constitute a significant safety hazards consideration as defined in 10CFR50.92.

Schedule of Change

These changes to the Vermont Yankee License and Technical Specifications will be implemented as soon as practicable following receipt of your approval.

