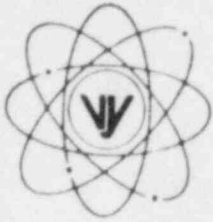


VERMONT YANKEE
NUCLEAR POWER CORPORATION

Proposed Change No. 98
Supplement 2



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

2.C.15.2
FVY 82-93

REPLY TO
ENGINEERING OFFICE
1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

August 19, 1982

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

Attention: Office of Nuclear Reactor Regulation

Reference: (a) License No. DPR-28 (Docket 50-271)
(b) Letter, VYNPC to USNRC, FVY 82-36, March 31, 1982, YAEC-1299P
(c) Letter, VYNPC to USNRC, FVY 81-128, dated September 2, 1981,
(Proposed Change No. 98)
(d) Letter, USNRC to VYNPC, SER, dated November 27, 1981
(e) Letter, VYNPC to USNRC, FVY 81-167, dated November 23, 1981

Subject: Supplement (2) to Reload 8 Licensing Submittal

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 change involves revision to page 180-01 of Vermont Yankee Technical Specifications. The revised page is provided as Attachment 1.

Reason for Change

The detailed reasons for this change are described in Reference (b). In general, this change reflects the Technical Specification MCPR Operating Limit changes and revisions based on the methodology described in the attachment to that Reference. Further, this change fulfills the commitment made in Reference (b).

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VERMONT YANKEE NUCLEAR POWER CORPORATION

U. S. Nuclear Regulatory Commission
August 19, 1982
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Basis for Change

The basis for the Vermont Yankee Reload 8 licensing analysis is provided in Reference (c). This reference presents licensing analysis results using methods developed by Vermont Yankee. Upon review of these methods, the staff concluded [Reference (d)] that the method for calculating the MCPR operating limits using the MAYU04-YAEC computer code was not acceptable. However, plant operation was allowed until EOC-2000 because the MCPR operating limits for operation between BOC through EOC-2000 were determined independent of MAYU04-YAEC methodology as documented in Reference (e). As a result, Vermont Yankee was requested to submit an improved or a new method for determining MCPR operating limits via Reference (d). In response, Vermont Yankee chose to submit a new method for determining MCPR operating limits as documented in Reference (b). This method is currently under review by the staff.

The revised MCPR operating limits submitted with this change are based on this new methodology, as described in Reference (b).

This change will also require an update to the Core Performance Analysis Report, YAEC-1275, which was submitted in Reference (c). This update is provided as Attachment 2.

Safety Considerations:

The method for calculating MCPR operating limits has received extensive review at Yankee. External technical peer review was attained through a presentation describing this method at the Second RETRAN International meeting held this April at San Diego. The method has been qualified against experimental data, and the results have shown excellent agreement with the data. The results of Vermont Yankee Reload 8 MCPR operating limits based on this method show no unexpected trends or deviations from the previous reload analysis. Therefore, Vermont Yankee concludes that this method can be used with confidence to evaluate core reloads and for compliance with licensing requirements. This change has been determined not to involve an unreviewed safety question.

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

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 previously forwarded with Reference (c).

