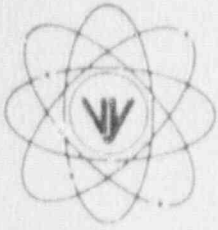


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Proposed Change 163

January 15, 1991

United States Nuclear Regulatory Commission
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Washington, DC 20555

- References:
- (a) License No. DPR-28, (Docket No. 50-271)
 - (b) Letter, VYV 89-195 (LER 89-23), VYNPC to USNRC, dated October 11, 1989
 - (c) Letter, WVY 74-5, VYNPC to USAEC, dated June 25, 1974

Dear Sir:

**Subject: Surveillance of the Indication of the LPCI Crosstie Monitor (Valve RHR-20):
Proposed Change No. 163**

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Vermont Yankee hereby proposes the following changes to Appendix A of the operating license Reference (a).

Proposed Change

This proposed change removes the surveillance requirement of the indication of the LPCI crosstie monitor [Residual Heat Removal (RHR) System Valve RHR-20] from the Vermont Yankee Technical Specifications. The proposed change would require replacing Page 51 of the Technical Specifications with the attached Page 51.

Reason for Change

On October 11, 1989, Vermont Yankee filed a License Event Report (LER) to the NRC [Reference (b)] which addressed noncompliance with Technical Specification 4.2.A as it applies to the daily surveillance of the valve position of RHR-20.

As explained in Reference (b), the RHR-20 valve is locked shut with its motor leads disconnected. Therefore, daily surveillance of its valve position indication is overly conservative and unnecessary and Technical Specification 4.2.A should be changed to remove the surveillance requirement of the RHR-20 valve.

Basis for Change

Vermont Yankee Technical Specifications require that an instrument check of the indication for the RHR System crosstie valve, RHR-20, be completed once per day. However,

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in Reference (c), Technical Specification 4.2.A was revised to reflect the removal of the RHR LPCI Loop selection logic. The loop selection logic was designed to determine which recirculation loop was breached during a LOCA and utilized the LPCI crosstie valve to direct cooling water to the selected loop. The change to the Technical Specification that removed the loop selection logic resulted in:

- o RHR-20 being chained and locked shut
- o RHR-20 motor leads being disconnected
- o The RHR-20 keylock switch being defeated

and thus the valve cannot be opened without direct manual intervention.

Because the RHR-20 valve is locked shut as described above, daily surveillance is not necessary. Also, current administrative procedures require surveillance for the RHR-20 valve position at a minimum frequency of once per operating cycle. Therefore, current administrative procedures ensure the proper positioning of the valve.

Safety Considerations

The proposed change is considered administrative because the RHR-20 valve is locked shut, the motor leads are disconnected, and the keylock switch is defeated. Thus, it cannot be opened without manual intervention. The change has been reviewed by the Plant Operations/Review Committee and the Nuclear Safety Audit and Review Committee.

Significant Hazards Considerations

10CFR50.92 states that a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not: (i) involve a significant increase in the probability or consequences of an accident previously evaluated; or (ii) create the possibility of a new or different kind of accident from any accident previously evaluated; or (iii) involve a significant reduction in a margin of safety.

The RHR-20 valve is locked shut, the motor leads are disconnected, and the keylock switch has been defeated. The proposed change refers only to the frequency of surveillance of the RHR-20 valve position indication, and therefore, can be considered administrative. As such, it does not increase the probability or consequence of any accident previously evaluated, nor does it create the possibility of a new or different kind of accident, nor does it involve any kind of safety margin. Therefore, the change does not involve a significant hazards consideration as defined in 10CFR50.92.

