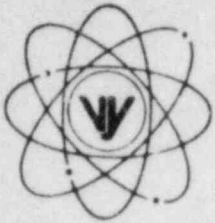


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-84

REPLY TO:  
ENGINEERING OFFICE

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

July 9, 1984

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation  
Mr. Domenic B. Vassallo, Chief  
Operating Reactors Branch No. 2  
Division of Licensing

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, VYNPC to USNRC, FVY 84-58, Proposed Change  
No. 120 to Facility Operating License No. DPR-28,  
dated June 5, 1984  
c) Letter, VYNPC to USNRC, FVY 84-62, Proposed Change  
No. 120, Supplement 1, to Facility Operating License  
No. DPR-28, dated June 15, 1984

Dear Sir:

Subject: Clarification of Proposed Change No. 120 to the Vermont  
Yankee Technical Specifications

By letter dated June 5, 1984 [Reference b)], we requested a change to the Vermont Yankee Technical Specifications to revise the definition of the term "Operable" and to incorporate a revision to Specification 3.7.B.1. These revisions were intended to allow refueling operations to proceed with one Emergency Diesel Generator out of service for routine maintenance purposes. Although Specification 3.5.H.4 presently allows refueling activities to be conducted with one diesel generator out of service, with respect to Emergency Core Cooling Systems (ECCS) operability, Specification 3.7.B.1 requires both diesel generators to be in service to declare secondary containment operable.

We have held numerous conference calls with members of your staff since the submittal of Reference b). Subsequently, we submitted Supplement 1 to the subject Proposed Change by letter dated June 15, 1984 [Reference c)]. This supplement deleted the proposed definition revision of "Operable" and, further, specifically revised Specification 3.7.B.1 so that secondary containment could be satisfied with the Standby Gas Treatment System (SBGTS) and one diesel generator operable.

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VERMONT YANKEE NUCLEAR POWER CORPORATION

We were recently informed by members of your staff that our existing Specification 3.7.B.1 can be interpreted to allow the following:

1. To begin moving irradiated fuel with one Emergency Diesel Generator out of service for maintenance, and/or
2. Change operational mode from shutdown to refueling with one Emergency Diesel Generator out of service for maintenance.

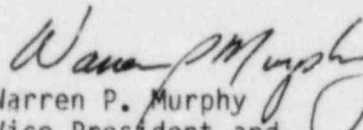
The above is allowed for up to seven days provided the appropriate surveillance requirements are satisfied. This interpretation will only be utilized during refueling/maintenance outages.

For the reasons stated in References b) and c), we request that you continue your review and approval of the subject Proposed Change in a timely manner. However, based on this interpretation of our existing Technical Specifications, it is no longer necessary to expedite this Proposed Change. The use of the aforementioned interpretation will be implemented, as necessary, during our present and future refueling outages.

We trust that the above interpretation is transcribed correctly; however, should you have any questions regarding this matter, please contact us as soon as possible.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and  
Manager of Operations