VERMONT YANKEE NUCLEAR POWER CORPORATION



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October 31, 1995 BVY 95-115

United States Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

References: a. License No. DPR-28 (Docket No. 50-271)

- b. Letter, USNRC to L.A. England (BWROG), Acceptance for Referencing of Topical Reports NEDO-31960 and NEDO-31960 Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology"(TAC NO. M75928), July 12, 1993.
- c. Licensing Topical Report, BWR Owners' Group Long-Term Stability Solutions Licensing Methodology, NEDO-31960, General Electric Nuclear Energy, June 1991.
- d. Licensing Topical Report, BWR Owners' Group Long-Term Solutions Licensing Methodology (Supplement 1), NEDO-31960 Supplement 1, General Electric Nuclear Energy, March 1992.
- e. Letter, USNRC to D.A. Reid (VYNPC), THERMAL HYDRAULIC STABILITY - VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. M87091), March 30, 1995

Subject:

Submittal of YAEC-1926, Yankee Atomic Electric Company Application of BWROG Stability Exclusion Region Methodology for Implementation of Long Term Solution Option 1-D at Vermont Yankee Nuclear Power Station

In July 1993, the NRC issued via reference (b) a Safety Evaluation Report (SER) for the BWR Owners' Group Long Term Stability Solution Licensing Methodology (references c and d). The SER and its attached Technical Evaluation Report (TER) contained specific conditions for acceptance of each solution for a given plant. Based on submittals of plant specific evaluations, Vermont Yankee received a SER (reference d) for long term stability solution Option 1-D, with requirements to provide a stability monitor and reload procedures to satisfy the conditions of the SER.

The attachment to this letter provides a validation report on the application of the BWROG exclusion region methodology to Vermont Yankee. The validation report concludes that the Vermont Yankee application provides a conservative approach for determining the excluded area of the power/flow map

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Unites States Nuclear Regulatory Commission October 31, 1995 Page 2

Vermont Yankee application provides a conservative approach for determining the excluded area of the power/flow map for a given fuel cycle. It is our intent to apply this methodology, upon receipt of an NRC SER approving its use, in calculating the power/flow exclusion region boundary in the Core Operating Limits Report and reference the subject report to meet the requirements of Reference (e).

The exclusion region calculations are one of two parts required for reload confirmation for an Option 1-D plant. The second part, validation of reactor protection system setpoints (detect and suppress methodology), has been submitted separately by the BWROG. This latter part of the stability reload confirmation will be calculated using the BWROG confirmation procedure.

We trust this information is acceptable; however, should you have any further questions, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

James J. Duffy

James J. Duffy Vermont Yankee Licensing Engineer

Enclosure

cc: USNRC Region I Administrator USNRC Resident Inspector - VYNPS USNRC Project Manager