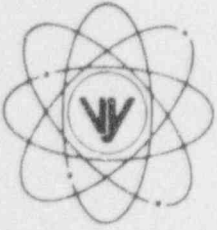


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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REPLY TO  
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February 5, 1996  
BVY 96-06

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

- References:
- (a) License No. DPR-28 (Docket 50-271)
  - (b) Letter, VYNPC to USNRC, BVY 94-49 dated May 4, 1994
  - (c) Letter, VYNPC to USNRC, BVY 94-74 dated July 1, 1994
  - (d) Letter, USNRC to VYNPC, NVY 94-132, dated August 17, 1994

Subject: Proposed Change No. 180, Administrative Change to Vermont Yankee Technical Specifications to Correct Typographical Errors and Text Inconsistencies

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following change to Appendix A of the operating license [Reference (a)].

Proposed Change:

Replace the pages of the Vermont Yankee Technical Specifications listed below with the attached revised pages:

ii	38	54	74	142a	245
17	39	56	81	159	249
20	40	57	88	168	250
21	41	58	90	186	255
22	42	59	92	193	258
23	43	60	93	194	260
25a	44	61	105	195	266
27	45	62	106	198	270
29	46	63	107	202	278
33	47	64	108	206	
34	49	67	118	209	
35	50	69	119	233	
36	51	72	140	237	
37	53	73	142	244	

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Changes to these pages are being proposed to correct typographical errors, textual inconsistencies, and minor errors which were identified primarily during our recent Technical Specification reformatting effort [References (b), (c), and (d)]. In addition, a number of potential enhancements were identified during an internal Technical Specification Evaluation we completed in 1994. Those changes identified during that evaluation which are administrative in nature are included within this proposed change. To further enhance the Technical Specifications, equipment identification numbers have been added to the Technical Specification tables in a uniform manner. A listing of the actual changes by page is attached as Enclosure A to aid in your review.

REASON FOR CHANGE:

Most of the changes in the attached listing were identified during the reformatting effort undertaken in preparing references (b), and (c); however, NRC guidance received regarding that change suggested that existing typographical errors and textual inconsistencies would be better addressed in a separate submittal following NRC approval of that change. Reference (d) documents NRC approval of the Vermont Yankee reformatted Technical Specifications. Since the receipt of that approval, we have completed a thorough review of our Technical Specifications to identify any administrative changes which could be made to enhance the document. These changes include correction of typographical errors, minor wording changes to enhance the usability of the document, and minor corrections to remove textual inconsistencies. To further enhance the Technical Specifications, equipment identification numbers have been added to the applicable Technical Specification tables in a uniform manner. In the past, equipment identification numbers were provided in only a few instances; this enhancement will provide this information for all applicable entries in the tables found in the Technical Specifications.

BASIS FOR CHANGE:

These proposed changes are considered enhancements to the Technical Specifications to correct obvious errors and textual inconsistencies and to enhance usability. These changes will have no effect on plant hardware, plant design, safety limit setting, or plant system operation.

SAFETY CONSIDERATIONS:

The changes proposed on the attached Technical Specification pages are administrative in nature and do not impact any FSAR safety analysis or change the function of any equipment. Approval of these changes will have no effect on plant safety. The proposed change has been reviewed by the Plant Operations Review Committee and the Vermont Yankee Nuclear Safety Audit and Review Committee.

SIGNIFICANT HAZARDS CONSIDERATIONS:

The standards used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulations, 10CFR50.92 which state that the 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 discussion below addresses the proposed changes with respect to these three criteria and demonstrates that the proposed amendment involves a no-significant-hazards consideration:

1. The administrative changes proposed herein will have no effect on plant hardware, plant design, safety limit setting, 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.
2. These changes do not affect any equipment nor do they involve any potential initiating events that would create any new or different kind of accident. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. These changes do not affect any equipment involved in potential initiating events or safety limits. Therefore, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

In addition, the Commission has provided guidance for the application of the significant hazards consideration standards in 10CFR50.92 by providing certain examples (51FR7751, dated March 6, 1986). An example of an action likely to involve a no significant hazards consideration is a purely administrative change to the Technical Specifications [example (i)]: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. This proposed change falls within the scope of this example since it involves the correction of typographical errors, changes to achieve consistency, and minor text corrections.

Based on the above, we conclude that the proposed change does not constitute a significant hazards consideration as defined in 10CFR50.92(c).

#### SCHEDULE OF CHANGE:

The proposed change will be incorporated into Vermont Yankee Technical Specifications and implemented as soon as practicable following receipt of your approval.

We trust that the information provided adequately supports our request, however, should you have any questions regarding this matter, please do not hesitate to contact us.



Enclosure A

Change Listing For Administrative Tech Spec Change

PAGE NO.	SECTION	LOCATION	TYPE	CHANGE
ii	TABLE OF CONTENTS	3.2	correction	add 3.2.J, 3.2.K, and 3.2.L
17	Bases 2.1.H	para 2, line 2	typo	"available" to "availability"
20	3.1	line 1	typo	"operbilty" to "operability"
20	4.1	line 2	typo	"instrumentttion" to "instrumentation"
21	Table 3.1.1	various	enhancement	added equipment identification numbers
22	Table 3.1.1	heading	enhancement	"Min. to Minimum"
22	Table 3.1.1	various	enhancement	added equipment identification numbers
23	Table 3.1.1 NOTES	note 3.c	typo	"lead" to "load"
25a	Table 4.1.1	various	enhancement	added equipment identification numbers
27	Table 4.1.2	various	enhancement	added equipment identification numbers
29	Bases 3.1	para 6, line 12	enhancement	"on FSAR Page 7.5-8" to "in FSAR Section 7.5.5.4"
29	Bases 3.1	para 8, line 1	correction	"Instrumentation (pressure switches) is..." to "Instrumentation is..."
33	Bases 4.1	para 2, line 2	correction	"bi-stable" to "bistable"
34	3.2.A	line 4	typo	"3.5 the" to "3.5, the"
35	3.2.G	line 9	typo	"accident of abnormal" to "accident or abnormal"
35	4.2.G	line 3	correction	"tested and calibrated" to "tested and/or calibrated"
36	3.2.I	line 4	enhancement	"operative" to "operable"
36	3.2.K	line 4	enhancement	"operative" to "operable"
36	3.2.K	line 5	enhancement	"Table 3.2.8" to "Table 3.2.7"
36	4.2.K	line 5	enhancement	"Table 4.2.8" to "Table 4.2.7"
37	3.2.L	line 8	enhancement	"Table 3.2.9" to "Table 3.2.8"
37	4.2.L	line 8	enhancement	"Table 4.2.9" to "Table 4.2.8"
38	Table 3.2.1	heading	enhancement	"for Operation are Not Satisfied" to "For Operation Are Not Satisfied"
38	Table 3.2.1	various	enhancement	added equipment identification numbers
39	Table 3.2.1	heading	enhancement	"for Operation are Not Satisfied" to "For Operation Are Not Satisfied"
39	table 3.2.1	various	enhancement	added equipment identification numbers
40	Table 3.2.1	heading	enhancement	"for Operation are Not Satisfied" to "For Operation Are Not Satisfied"
40	Table 3.2.1	various	enhancement	added equipment identification numbers
41	Table 3.2.1	heading	enhancement	"for Operation are Not Satisfied" to "For Operation Are Not Satisfied"
41	Table 3.2.1	various	enhancement	added equipment identification numbers
42	Table 3.2.1	heading	enhancement	"for Operation are Not Satisfied" to "For Operation Are Not Satisfied"
42	Table 3.2.1	various	enhancement	added equipment identification numbers
43	Table 3.2.1	heading	enhancement	"for Operation are not Satisfied" to "For Operation Are Not Satisfied"
43	Table 3.2.1	various	enhancement	added equipment identification numbers



PAGE NO.	SECTION	LOCATION	TYPE	CHANGE
44	Table 3.2.1	note 4	typo	"one-out-of two" to "one-out-of-two"
45	Table 3.2.2	heading	enhancement	"for Operation are Not Satisfied" to "For Operation Are Not Satisfied"
45	Table 3.2.2	various	enhancement	added equipment identification numbers
46	Table 3.2.2	heading	enhancement	"for Operation are not Satisfied" to "For Operation Are Not Satisfied"
46	Table 3.2.2	various	enhancement	added equipment identification numbers
47	Table 3.2.2	heading	enhancement	"for Operation are not Satisfied" to "For Operation Are Not Satisfied"
47	Table 3.2.2	various	enhancement	added equipment identification numbers
49	Table 3.2.3	heading	enhancement	"for Operation are not Met" to "For Operation Are Not Satisfied"
49	Table 3.2.3	various	enhancement	added equipment identification numbers
50	Table 3.2.4	heading	enhancement	"Condition for Operation Are Not Met" to "Conditions For Operation Are Not Satisfied"
51	Table 3.2.5	various	enhancement	added equipment identification numbers
53	Table 3.2.6	various	enhancement	added equipment identification numbers
54	Table 3.2.6	Cont. H2O2 Monitor	correction	"Meter" to "Recorder" (2 places)
54	Table 3.2.6	various	enhancement	added equipment identification numbers
56	Table 3.2.7	Title	enhancement	"TABLE 3.2.8" to TABLE 3.2.7"
56	Table 3.2.7	various	enhancement	added equipment identification numbers
57	Table 3.2.8	Title	enhancement	"TABLE 3.2.9" to TABLE 3.2.8"
57	Table 3.2.8	various	enhancement	added equipment identification numbers
58	TABLE 3.2.8 NOTES	heading	enhancement	"TABLE 3.3.9" to "TABLE 3.2.8"
59	Table 4.2.1	various	enhancement	added note 4 to four entries
60	Table 4.2.1	various	enhancement	added note 4 to six entries
61	Table 4.2.1	various	enhancement	added note 4 to four entries
62	Table 4.2.1	various	enhancement	added note 4 to two entries
63	Table 4.2.1	various	enhancement	moved note 4 under "Functional Test" heading
64	Table 4.2.2	various	enhancement	added note 4 to three entries
67	Table 4.2.3	various	enhancement	added note 4 to two entries
69	Table 4.2.5	various	enhancement	added equipment identification numbers
72	Table 4.2.7	Title	enhancement	"TABLE 4.2.8" to "TABLE 4.2.7"
73	Table 4.2.8	Title	enhancement	"TABLE 4.2.9" to "TABLE 4.2.8"
74	Table 4.2 NOTES	note 4	correction	note rewritten to reference Technical Specification Definition G.1
81	3.3.A.2	line 1	typo	"driven" to "drives"
88	3.3.F	line 2	correction	"3.3A through D" to "3.3A through E"
90	Bases 3.3&4.3	4	typo	"report" to "Report"
92	4.4.A	"2nd" 1&2	enhancement	"1&2" to "3&4"
93	4.4.A	3&4	enhancement	"3&4" to "5&6"
105	3.5.D.3	line 11, 16	clarification	"subsystem" to "subsystem(s)"
105	4.5.D.3	line 7	clarification	"subsystem" to "subsystem(s)"

PAGE NO.	SECTION	LOCATION	TYPE	CHANGE
106	3.5.E.3	line 7	clarification	"reduced to 120 psig" to "reduced to less than 120 psig"
107	3.5.F.3	line 7	clarification	"reduced to 100 psig" to "reduced to less than 100 psig"
107	4.5.G.1	para 2 line 8	clarification	"normal operating pressure" to "normal reactor operating pressure"
108	3.5.G.3	line 7	clarification	"reduced to 120 psig" to "reduced to less than 120 psig"
108	3.5.H.1	line 2	clarification	"standby" to "emergency"
108	3.5.H.1	line 9,10	clarification	"Low Pressure Core Cooling" to "LPCI and CS"
108	4.5.H.1	line 1	clarification	"standby" to "emergency"
118	3.6.B.2	line 10	typo	"0.01 ppm" to "0.1 ppm"
119	3.6.B.5	line 1	typo	"3.6.B." to "3.6.B"
140	Bases 3.6 and 4.6 A	para 3 line 3	typo	"CFR" to "10CFR"
140	Bases 3.6 and 4.6 B	section heading	correction	"Coolant Chemistry" to "B. Coolant Chemistry"
140	Bases 3.6 and 4.6 B	para 1 line 4	correction	"3.8.C.1a" to "3.8.E.1"
140	Bases 3.6 and 4.6 B	para 2 line 4	typo	"postulate" to "postulated"
142	Bases 3.6 and 4.6 B	para 1 line 5	correction	"4.6.B.2" to "4.6.B.1.b"
142	Bases 3.6 and 4.6 C	para 1 line 6	typo	"leakage;" to "leakage."
142a	Bases 3.6 and 4.6 E	line 1	correction	"Table 4.2-4 of the FSAR" to "Table 4.2-3 of the FSAR"
159	Table 4.7.2.a	line 4	typo	"SG" to "SC"
168	Bases 4.7.A	para 1 line 5	correction	"will be" to "was"
186	Bases 3.8.D	para 2 line 5	typo	"portable" to "potable"
193	Table 3.9.1	various	enhancement	added equipment identification numbers
194	Table 3.9.1 Notation	note 5, line 6	typo	"e.8.A.1" to "3.8.A.1"
195	Table 3.9.2	various	enhancement	added equipment identification numbers
198	Table 3.9.3	line 5	typo	"meteorological" to meteorological"
198	Table 3.9.3	line 10	typo	"meteorological" to meteorological"
202	Table 3.9.4	note (a), line 4	correction	"+... 1.0." to "+... < 1.0."
206	Table 4.9.2 Notation	note (1) (a)	typo	"indicate" to "indicates"
206	Table 4.9.2 Notation	note (4), line 3	correction	"hydrogen balance nitrogen" to "hydrogen balance air"
209	Bases 3.9.C	para 2 lines 10&11	correction	"Guides 4.3 (C.2.a) and 4.1 (C.2.b), Revision 1, April 1975" to "Guide 4.1 (C.2.b), Revision 1, April 1975"
233	4.12.E	line 4	typo	"control rods control cell" to "control rod's control cell"
237	Bases 3.12 & 4.12.A	para 2 line 6	correction	"Specification 3.2 limits" to "Specification 3.3 limits"
244	3.13.C.1	line 2	typo	"3.12.C.2" to "3.13.C.2"
245	3.13.D	Title	correction	"System" to "Systems"
245	3.13.D.1	line 5	correction	"switchgear room" to "switchgear rooms"
245	4.13.D	Title	correction	"CO <sub>2</sub> System" to CO <sub>2</sub> Systems"
245	4.13.D.1	line 1	correction	"CO <sub>2</sub> System" to CO <sub>2</sub> Systems"
245	4.13.D.1	line 3	correction	"switchgear room" to switchgear rooms"

PAGE NO.	SECTION	LOCATION	TYPE	CHANGE
249	4.13.G.1.d	para designation	correction	"d." to "c."
250	TABLE 3.13.A.1	Item 2	enhancement	changed to clearly indicate the division of the switchgear room into 2 fire areas
255	6.1.D.4.c, d, e, g, h	line 1	correction	"Supervisor" to "Manager"
255	6.1.D.4.e	line 1	correction	"See Item D.7, Page 190a" to "See Item 6.1.D.7"
255	6.1.D.4.f	line 1	correction	"Reactor and Computer Supervisor" to "Reactor Engineering Manager"
258	6.2.A.1.c	line 1	correction	"Engineering Support Supervisor" to "Engineering Manager"
258	6.2.A.1.d, e, g, h, i	line 1	correction	"Supervisor" to "Manager"
258	6.2.A.1.f	line 1	correction	"Reactor and Computer Supervisor" to "Reactor Engineering Manager"
260	6.2.b.2	line 2	correction	"members of " to "members plus"
266	6.7	lines 3, 4	correction	"...shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement..." to "...shall be submitted to the appropriate Regional Office..."
270	6.7.A.4	4th reference	correction	"VYNRC to USNRC" to "VYNPC to USNRC"
278	6.14	foot note, line 2	correction	"annual" to "periodic"