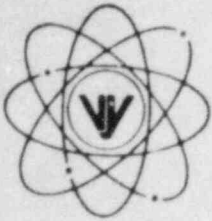


VERMONT YANKEE NUCLEAR POWER CORPORATION

Proposed Change #128



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

REPLY TO:
ENGINEERING OFFICE
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March 4, 1985
FVY 85-25

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

Attention: Office of Nuclear Reactor Regulation
Mr. Harold R. Denton, Director

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, Amendment No. 83 to
Facility Operating License No. DPR-28, dated 10/9/84
c) Letter, USNRC to VYNPC, Generic Letter
No. 83-43, dated 12/19/83
d) Letter, VYNPC to USNRC, Proposed Change
No. 78 - Supplement 1, dated 1/23/84
e) Letter, VYNPC to USNRC, FVY 83-116, dated 11/2/83

Dear Sir:

Subject: Administrative Changes to the Vermont Yankee Technical
Specifications Relating to Radiological Effluent
Technical Specifications (RETS)

Pursuant to Section 50.59 of the Commission's Rules and Regulations,
Vermont Yankee Nuclear Power Corporation hereby proposes the following modifica-
tions to Appendix A of the Operating License:

Proposed Change:

The proposed change involves administrative updates to the Vermont Yankee
Technical Specifications to: (1) reflect a recent rule change to 10CFR50.72 and
50.73, Licensee Event Reporting Requirements; (2) reduce the amount of infor-
mation presently provided in Monthly Operating Reports (Specification 6.7.A.3);
(3) clarify the bases of Specification 3.11.C, Minimum Critical Power Ratio
(MCPR); and (4) to correct two errors associated with the issuance of Amendment
No. 83 to Facility Operating License No. DPR-28, Radiological Effluent Technical
Specifications (RETS).

For the purposes of the NRC's review of this proposed change, it should be
noted that the attached revise Technical Specification pages reflect the recent
issuance of Amendment No. 83 [Reference b)]. Although this amendment does not
become effective until April 1, 1985, we presume that the NRC's review of this
proposed change will not be complete until after this date.

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PDR ADOCK 05000271
P PDR

*Avool w/check \$150
3/40 # 002102*

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The details for each of the changes discussed above is as follows:

Change (1)

The revision of pages 1, and 209 to reflect new reporting requirements consistent with the provisions of 10CFR50.72 and 50.73, Licensee Event Reporting Requirement. This change is also consistent with the intent of Generic Letter 83-43 [Reference c)] which was issued subsequent to the rule change to 50.72 and 50.73.

Because of the new reporting requirements, existing Specifications 6.7.B.2, Prompt Notification with Written Follow-up, and 6.7.B.2, Thirty Day Written Report, are no longer applicable and have been deleted. Deleting these Specifications results in the deletion of existing pages 210, 211 and 212. In addition, to consolidate Section 6 of the Technical Specifications, pages 213 through 222 have been renumbered as pages 210 through 220.

Change (2)

The revision of page 209 to reflect the deletion of certain provisions of Specification 6.7.A.3. Specifically, we have deleted the provision to include the reporting of major safety-related maintenance activities as part of the "Monthly Operating Report." In addition, we have changed the name of this report to "Monthly Statistical Report" to be consistent with nomenclature used in plant procedures.

Change (3)

The revision of page 180h to clarify the bases for the Minimum Critical Power Ratio (MCPR) operating limits. Bases Specification 3.11.C has been reworded to state that the limits are justified, as well as presented, in the current cycle's Core Performance Analysis Report.

Change (4)

The revision of pages 149 and 216 to reflect corrections of errors associated with the issuance of Amendment No. 83 [Reference b)]. The word "or" has been deleted from Specification 4.8.D.1 (page 149).

During the NRC's review of Proposed Change No. 78 - Supplement 1 [Reference d)], we informed the staff that the word "or" was a typographical error and should be deleted. The staff concurred; however, the specification was not corrected prior to the issuance of Amendment No. 83.

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The change to page 216 reflects the addition of Specification 6.7.C.4, Fire Protection System Reporting. This specification is presently in the Vermont Yankee Specifications under Section 6.7.C, but was inadvertently deleted by us when we submitted the extensive page changes associated with Proposed Change No. 78 - Supplement 1.

Change (5)

The revision of the Table of Contents to bring it up-to-date with respect to the existing Technical Specifications

Reason and Basis for Change

The reason and basis for each change is as follows:

Change (1)

As discussed in Generic Letter 83-43 [Reference c)], the NRC promulgated a change to 10CFR50.72 and 50.73, which become effective January 1, 1984. Section 50.72 was revised to reflect the immediate notification requirements for operating nuclear power reactors. A new Section 50.73 was added to provide for a revised Licensee Event Report (LER) System.

Section 50.73(g) states that "the requirements contained in this Section replace all existing requirements for licensees to report "Reportable Occurrences, as defined in individual plant Technical Specifications." Generic Letter 83-43 provided model Technical Specifications in the Standardize Technical Specification (STS) format for the "administrative controls" and definitions" sections of Technical Specifications. These model specifications were used as the basis for our proposed change.

The change proposed herein will bring the Vermont Yankee Technical Specifications into compliance with the revised regulations and eliminate possible contradiction between the requirements of Technical Specifications and the provisions of 10CFR50.72 and 50.73.

This change also addresses a commitment made by us in our letter dated November 2, 1983 [Reference e)].

Change (2)

Specification 6.7.A.3 presently requires that we submit a "Monthly Operating Report" to the NRC which includes a narrative summary of operating experience and information pertaining to any major safety-related maintenance.

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We propose to delete the provision for reporting major safety-related maintenance activity. The basis for deleting this provision includes: (1) there is no NRC requirement to report maintenance information as part of the Monthly Statistical Report; (2) BWR Standardized Technical Specification (STS) do not require reporting maintenance of any type; (3) existing plant maintenance programs can be inspected and audited by the I&E Resident Inspector; (4) equipment failures are reported to the Nuclear Plant Reliability Data System (NPRDS); and (5) certain equipment failures are reportable under the provisions of 10CFR50.73.

In addition, we have revised the title of report to "Monthly Statistical Report" to be consistent with the nomenclature of our plant procedures.

Change (3)

Bases Specification 3.11.C.1 (page 180h) presently states, "The MCPR operating limits are presented in Appendix A of the current cycle's Core Performance Analyses Report." The MCPR limits are actually presented in Table 3.11.2 of our Technical Specifications. Since this statement was intended to reflect the "bases" of the MCPR limits, we propose to modify the statement to read:

"The MCPR operating limits are justified by the analyses, the results of which are presented in the cycle's Core Performance Analyses Report."

This change clarifies the bases for the MCPR operating limits.

Change (4)

The change to page 149 merely corrects for a typographical error. The change to page 216 formally adds a special reporting requirement which was inadvertently deleted during a previous Technical Specification amendment request.

Change (5)

The changes to the Table of Contents merely update the Table to be consistent with the Specifications.

Safety Considerations:

All of the changes described above are administrative in nature and have no safety or environmental significance.

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This change has been reviewed by the Vermont Yankee Nuclear Safety Audit and Review Committee (NSARC).

Significant Hazards Consideration:

The Commission has provided guidance concerning the application of the standards for determining whether a "significant hazards" consideration exists by providing certain examples [see 48FR14870]. The examples of actions involving no significant hazards include (i) a change to make a license conform to changes in the regulations, where the change results in very minor changes to facility operations, clearly in keeping with the regulations; and (ii) a purely administrative change to Technical Specifications, for example, a change to achieve consistency throughout Technical Specifications, correction of an error, or a change in nomenclature.

Based on the above, we have concluded that change (1) does not constitute a significant hazards consideration, as defined by 10CFR50.92(c), since the change merely updates our specifications to be consistent with a rule change to 10CFR50, and results in changes to our reporting requirements so as to be consistent with 10CFR50.72 and 50.73. This change is consistent with the intent of Example (i).

We have concluded that Change (2) does not constitute a significant hazards consideration since this change deletes a provisions that is not required by any regulation and the information intended by the provision is reported by other mechanisms. This change is consistent with the intent of Example (i).

We have concluded that changes (3), (4) and (5) do not constitute significant hazards considerations as they are administrative in nature, do not alter the intent of our Technical Specifications, and promote consistency throughout the specifications. These changes are consistent with the intent of Example (ii).

Fee Determination:

In accordance with the provisions of 10CFR 170.72, we are enclosing an application fee of \$150.00.

Schedule of Change:

This proposed change will be incorporated into the Vermont Yankee Technical Specifications as soon as practicable upon receipt of your approval. It should be noted that although our current specifications are not consistent with the provision of 10CFR50.72 and 50.73, Licensee Event Reporting Requirements, we presently meet the the requirements of these regulations.

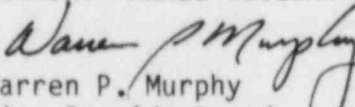
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It should also be noted that we will be incorporating the changes associated with Change (2) into our Technical Specifications upon issuance of the revised pages associated with Amendment No. 83. As discussed above, this Amendment will be in effect on April 1, 1985.

We trust that this information is sufficient to allow for your review and subsequent issuance of a License Amendment; however, should you have any questions regarding these changes, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

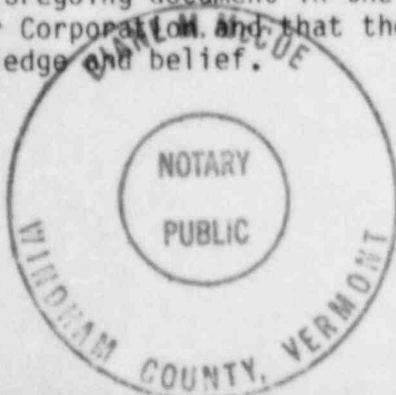
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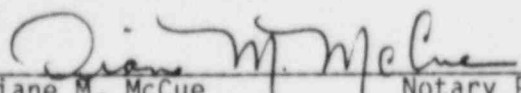
cc: U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Document Control Desk (40 copies)

Vermont Department of Public Service
120 State Street
Montpelier, Vermont 05602
Attention: Mr. Gerald Tarrant, Chairman

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Warren P. Murphy, who, being duly sworn, did state that he is Vice President and Manager of Operations of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.




Diane M. McCue Notary Public
My Commission Expires February 10, 1987