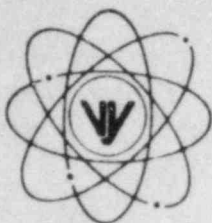


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-124

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

October 22, 1984

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, VYNPC to USNRC, FVY 84-8, dated 2/7/84, Proposed Change No. 117
- c) Letter, USNRC to VYNPC, dated 5/3/84; Generic Letter 84-13
- d) Letter, VYNPC to USNRC, FVY 84-87, dated 7/9/84
- e) Letter, USNRC to VYNPC, dated 3/29/84, Inspection 50-271/84-03
- f) Telecon, R.J. Wanczyk/H. Gregg, dated 8/8/84

Dear Sir:

Subject: Request for License Amendment - Safety Related Shock Suppressors

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

PROPOSED CHANGE

Replace pages 110a, 110b and 116 of the Vermont Yankee Technical Specification with the attached revised pages 110a, 110b, 110c, 110d, 110e, 110f, 116, and delete pages 116a-116c. These pages were initially submitted to the USNRC in Reference b). Subsequent discussions with members of the USNRC staff and receipt of Reference c) have resulted in additional changes as indicated in the attached revised pages. This change supersedes Reference b).

REASON AND BASES FOR CHANGE

In 1980, the NRC transmitted revised guidelines for snubbers to licensees and requested that licensees submit an amendment application incorporating the applicable portions of the model Technical Specifications. In February of this year, Vermont Yankee submitted Proposed Change No. 117 in response to the NRC's request.

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VERMONT YANKEE NUCLEAR POWER CORPORATION

Subsequently, discussions took place with NRC regional personnel, during both an on-site inspection [Reference e)] and telephone conversation [Reference f)]. The revised, attached Technical Specification pages reflect commitments and/or resolutions reached during and after our original transmittal.

Revision to pages 116a through 116c are made as a result of USNRC Generic Letter 84-13 [Reference c)].

SAFETY CONSIDERATIONS

The changes proposed in this submittal are intended to bring the Vermont Yankee Technical Specifications into conformance with NRC guidance. The changes enhance the current specification by clarifying: 1) operability requirements; 2) inspection criteria; 3) retest requirements; and 4) requiring engineering evaluations should degraded conditions be found.

We have concluded that the probability of previously evaluated accidents would not be increased by this change. The possibility of a different type of accident is not created nor are the margins of safety, as defined in the basis of the Technical Specifications, reduced by this change. Therefore, we have determined that this change does not constitute an unreviewed safety question as defined in 10CFR50.59(a)(2).

This supplemental submittal has been reviewed by the Vermont Yankee Nuclear Safety Audit and Review Committee.

SIGNIFICANT HAZARDS CONSIDERATION

The NRC has provided guidance concerning the application of standards for conclusions regarding "Significant Hazards Consideration" [47FR14870]. The examples of actions involving no significant hazards consideration include: a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications (for example, a more stringent surveillance requirement).

As discussed above, this proposed change enhances the current Technical Specifications by clarifying snubber operability requirements, inspection criteria, retest requirements, and the need for engineering evaluation should degraded conditions be found. Since the proposed specifications are more restrictive than those in the present Technical Specifications, we have concluded that this changes does not constitute a significant hazards consideration, as defined in 10CFR50.92(c).

VERMONT YANKEE NUCLEAR POWER CORPORATION

FEE DETERMINATION

This proposed change requires an approval that involves a single safety issue and is deemed not to involve a significant hazards consideration. A payment of \$4,000.00 was forwarded with Reference b).

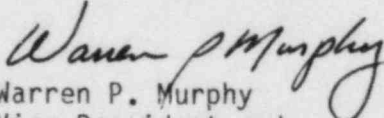
SCHEDULE FOR CHANGE

This change will be incorporated into the Technical Specifications upon receipt of your approval.

We trust that the information provided is sufficient to allow for your review and for the subsequent issuance of a license amendment; however, should you have any questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm

cc: Vermont Department of Public Service
120 State Street
Montpelier, Vermont 05602

U.S. Nuclear Regulatory Commission
Document Control Desk (40 copies)