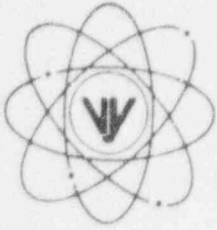


VERMONT YANKEE NUCLEAR POWER CORPORATION



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REPLY TO
ENGINEERING OFFICE
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April 26, 1996
BVY 96-53

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

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, VYNPC to USNRC, BVY 93-81, dated August 27, 1993
(c) Letter, USNRC to VYNPC, NVY 95-48, dated April 5, 1995
(d) Telecon, D.H. Dorman (USNRC) to J. Duffy (VYNPC), dated August 10, 1995

Subject: Proposed Change Number 170 to the Vermont Yankee Technical Specifications -
Incorporation of Comments and Submittal of Revised Technical Specification Pages

By Reference (b), Vermont Yankee requested an amendment to the Vermont Yankee Technical Specifications to incorporate changes to 10 CFR Part 20 and 10 CFR 50.36a. By Reference (c), NRC approved Vermont Yankee's proposed changes regarding 10 CFR 50.36a by issuing amendment 144 to the Vermont Yankee Technical Specifications. The NRC reviewed the remaining changes, those related to 10 CFR Part 20, separately.

By Reference (d), NRC provided Vermont Yankee with comments on the remaining portion of our proposed change and requested an updated copy of the affected Technical Specification pages. Vermont Yankee incorporated the following NRC comments into the attached revised Technical Specification pages:

1. Delete definitions of "Unrestricted Area", "Restricted Area" and "Controlled Area" since these terms are defined by regulation in 10CFR20.1003.
2. Revise Bases 3.8.1 Liquid Holdup Tanks, such that the 10 curie tank limit, if released to the Connecticut River, would not exceed the new ECL values of Appendix B to 10CFR Part 20 when averaged over the volume of the the nearest surface water body. This is a change from what had been proposed in Reference (b) since it lowers the absolute concentration values which could occur in the nearest surface water by a factor of 10.
3. Correct Technical Specification 6.5.B.1 by changing "required by Paragraph 20.1601(a)(1)" to "required by Paragraph 20.1601(a)." Therefore the revised Technical Specification reads, in part, "In lieu of the 'control device' or 'alarm signal' required by Paragraph 20.1601(a)." This change was made since "control device" is discussed in subparagraph 20.1601(a)(1) and (2) and "alarm signal" is discussed in subparagraph 20.1601(a)(2). Therefore "Paragraph 20.1601(a)" covers both of these.

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In addition, Vermont Yankee has made the following changes to the original proposed change:

1. Deleted definition of "Members of the Public" since this term is defined by regulation in 10CFR20.1003 (Enclosure B, page 4).
2. Deleted the phrase "to the plant" in TS Bases 3.8.E. The original Technical Specification (Enclosure B, page 186) reads "via the cow-milk-infant pathway to 1500 mrem/year for the nearest cow to the plant." The original proposed change (Reference (b), page 160f) revised this to read "via the cow-milk-infant pathway to 1500 mrem/year for the highest impacted cow to the plant." The phrase "to the plant" is now being deleted since its meaning depends on the word "nearest" and "nearest" was deleted in the original proposed change.
3. Revised Table 4.8.2.B Sampling Frequency and Minimum Analysis Frequency from the changes proposed in Reference (b), page 160. Added "for particulates" under Sampling Frequency" and Deleted "Grab sample for Particulates" under "Minimum Analysis Frequency."
4. Revised Section 6.13, Offsite Dose Calculation Manual, proposed paragraph A.3. The original proposed change (Reference (b), page 219) stated that licensee initiated changes to the ODCM "shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM." This has been revised to require that only the affected pages of the ODCM be submitted to the Commission, consistent with current, acceptable practice. Since Vermont Yankee maintains the highest professional standards in preparing its regulatory correspondence, the word "legible" is considered unnecessary and has been deleted.

These additional proposed changes are either administrative in nature or supported by the Significant Hazards Consideration in Reference (b). Therefore, in accordance with 10 CFR 50.90 and Reference (d), no additional Significant Hazards Analysis is required.

A copy of the revised Technical Specification pages is attached as Enclosure A. A copy of marked-up Technical Specification pages is attached as Enclosure B.

We trust that the information provided is acceptable, however should you have any questions, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



James J. Duffy
Licensing Engineer

Enclosures A and B

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