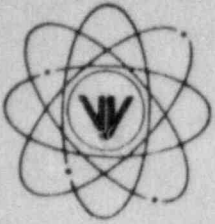


# VERMONT YANKEE NUCLEAR POWER CORPORATION

Proposed Change No. 123



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

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD  
FRAMINGHAM, MASSACHUSETTS 01701  
TELEPHONE 617-872-8100

November 2, 1984  
FVY 84-130

United States Nuclear Regulatory Commission  
Washington, D. C. 20555

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

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) Letter, VYNPC to USNRC, FVY 84-38, dated April 27, 1984  
(c) Letter, USNRC to VYNPC, NVY 84-151, dated July 2, 1984  
(d) Letter, VYNPC to USNRC, FVY 82-86, dated July 22, 1982

Subject: Mark I Containment - Proposed Technical Specification Change

Dear Sir:

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 138, 139, and 139a with the attached revised Pages 138, 139, and 139a to the Vermont Yankee Technical Specifications. This change updates the Primary Containment bases (Specification 3.7.A) of the Vermont Yankee Technical Specifications to incorporate the results of the VYNPS Plant Unique Analysis Report (PUAR) for the Mark I Containment long-term program.

Reason for Change:

By letter, dated July 2, 1984 [Reference (c)], the NRC requested that Vermont Yankee submit any Technical Specification changes required as a result of the Mark I Containment modifications made (i.e., torus temperature monitoring system changes, torus to drywell differential pressure control changes, and torus water level changes).

*A025  
1/1 w/check \$150<sup>00</sup>  
# 042135*

We have performed a review of the Technical Specifications as requested by Reference (c) and have concluded that the only changes required at this time are those necessary to update the bases to reflect the Plant Unique Analysis Report (PUAR). The PUAR verifies that all stresses in the suppression chamber structure including shell, external supports, vent system, internal structures, and attached piping meet the structural acceptance criteria of NUREG-0661, "Safety Evaluation Report, Mark I Containment Long-Term Program". It should be noted that proposed Technical Specifications for torus temperature monitoring system changes are presently under NRC review [Reference (d)].

Basis for Change:

By letter, dated April 27, 1984 [Reference (b)], Vermont Yankee submitted Revision 2 of the Plant Unique Analysis Report (PUAR) for the Mark I Containment program at the Vermont Yankee Nuclear Power Station. This report summarized the results of the extensive analysis on the Vermont Yankee torus structure and reported safety margins against established criteria.

On July 2, 1984, the NRC notified Vermont Yankee by letter [Reference (c)], that it had completed the post-implementation audit review of the Vermont Yankee PUAR for the Mark I Containment Long-Term program. The staff determined that all but a few of the modifications made by Vermont Yankee were in accordance with the generic acceptance criteria contained in Appendix A of NUREG-0661, Mark I Containment Long-Term program and its supplement. The NRC also determined that any deviations taken from the acceptance criteria specified in NUREG-0661 were found acceptable. The staff concluded that the PUAR verified that the containment modifications made restored the original design safety margin to the Mark I Containment at Vermont Yankee and that their review was complete. By this same letter, the NRC provided its safety evaluations for the pool dynamic and structural load aspects of the Mark I Containment Long-Term program and requested that Vermont Yankee submit any Technical Specification changes required as a result of the Mark I containment modifications made. As previously stated, Vermont Yankee has performed a review of the Technical Specifications and concluded that the only changes required at this time are those necessary to update the Primary Containment bases (Specification 3.7.A) to reflect the PUAR.

Safety Considerations:

This proposed change is administrative in nature and serves to update the Primary Containment bases of the Vermont Yankee Technical Specifications. Therefore, this change is not considered to constitute an unreviewed safety question as defined in 10CFR50.59(a)(2).

This change has been reviewed by the Nuclear Safety Audit and Review Committee.

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 (48FR14870).

One example of an action not involving significant hazards includes example (i), a purely administrative change to Technical Specifications; for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. As described above, the proposed change serves to update the Primary Containment basis section of the Vermont Yankee Technical Specifications along the lines of an administrative change to incorporate the conclusions of the safety evaluations by the Office of Nuclear Reactor Regulation related to the Mark I Containment Long-Term program pool dynamic loads and structural reviews issued under Reference (c). Therefore, we conclude that this Proposed Change does not constitute a significant hazards consideration as defined in 10CFR50.92(c).

Fee Determination:

In accordance with the provisions of 10CFR170.12, an application fee of \$150.00 is enclosed.

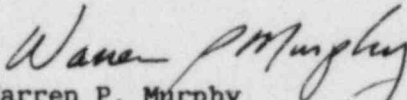
Schedule of Change:

This change will be incorporated into the Vermont Yankee Technical Specifications as soon as practicable following receipt of your approval.

We trust that the information provided above adequately supports our request; however, should you have any questions in this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and Manager of Operations

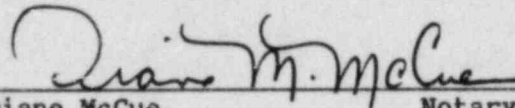
RC/cmj  
Enclosure

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

Vermont Department of Public Services  
120 State Street  
Montpelier, Vermont 05602  
Attention: Mr. Richard Saudek, Chairman

STATE OF VERMONT )  
                          )ss  
OF WINDHAM COUNTY)

Then personally appeared before me, Warren P. Murphy, who, being duly sworn, did state that he is a 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 McCue

Notary Public

My Commission Expires

