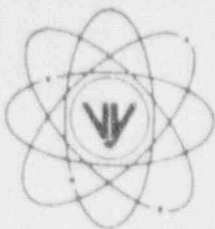


# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO  
ENGINEERING OFFICE  
580 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

December 15, 1992  
BVY 92-140

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

Reference: (a) License No. DPR-28 (Docket No. 50-271)

Subject: Proposed Change No. 167, Calibration Requirements For Control  
Rod Block Instrumentation

Dear Sir:

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 Page 59 of the Vermont Yankee Technical Specifications with the attached revised Page 59. A change to Page 59 is being proposed to correct the surveillance requirements applicable to the calibration of equipment responsible for the "Detector Not Fully Inserted" Trip Function for the Startup Range Monitor (SRM) and Intermediate Range Monitor (IRM).

The specific change is to correct the calibration interval for the SRM and IRM "Detector Not Fully Inserted" Trip Function. It is proposed to change the interval from "a required frequency not to exceed once per week" to "NA" (Not Applicable). A calibration requirement is not applicable to equipment performing this function. It is believed that the Note 6 entry dictating calibration frequency was an error. Actual maintenance and functional testing performed on the equipment of concern will not change. Therefore, this change is considered to be Administrative.

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### Reason for Change

We are proposing a change to the Technical Specification calibration requirements in Table 4.2.5 to reflect that no meaningful calibration of the SRM and IRM "Detector Not Fully Inserted" Control Rod Block function is possible. Verification of proper operation of the "Detector Not Fully Inserted" Trip Function is provided by functional testing. As such, it is proposed to change the "Note 6" entry under calibration to "NA" in Table 4.2.5. Actual surveillances and testing presently performed on the subject equipment will not change. A "NA" entry for this requirement is consistent with the requirements in the BWR Standard Technical Specifications and with requirements existing in Technical Specifications of other BWRs.

### Basis for Change

Table 4.2.5 has been revised to include a "NA" entry under calibration frequency for the SRM and IRM "Detector Not Fully Inserted" Trip Function. Vermont Yankee does not consider any of the actions performed to assure proper operation of this trip function to fall under the category of calibration nor do we believe that any additional actions other than functional testing are necessary. Additional assurance of proper equipment operation is provided by periodic maintenance on this equipment. Only the listed calibration frequency in the Technical Specifications has changed. The correction in calibration frequency will not change any of the surveillances or testing which are currently being performed. All the required maintenance will remain the same. The calibration requirements have been revised to agree with those which currently exist in the BWR Standard Technical Specifications and in Technical Specifications of other BWRs. This change will not pose any change to the design basis, protective function, redundancy, trip point, or logic of the original system.

### Safety Considerations

The change in the surveillance requirements for SRM and IRM "Detector Not Fully Inserted" calibration will not change the function of any equipment. Current maintenance and functional testing will assure component operability of this equipment.

The SRM and IRM equipment installed at Vermont Yankee has proven to function properly with the tests and calibrations presently being performed in accordance with applicable Technical Specification requirements.

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The requested change to the calibration frequency of the "Detector Not Fully Inserted" Rod Block function does not impact any FSAR safety analysis nor does it involve any change in Technical Specification setpoints, plant operation, protective function or design basis of the plant. Assurance of equipment operation is still provided by the functional tests, calibrations and maintenance, which are still to be performed, such that interded Control Rod Block Functions are provided.

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 proposed change to correct the "Detector Not Fully Inserted" calibration interval from "not to exceed once per week" to "NA" reflects what is considered to be a correction to the Technical Specifications. The proposed calibration interval is consistent with that which appears in the BWR Standard Technical Specifications and the Technical Specifications of some other BWRs. The procedures currently performed to assure the "Detector Not Fully Inserted" Function is operable are actually covered by functional testing and equipment maintenance. This existing testing and maintenance, which will not change, has demonstrated that it is appropriate to assure reliable operation of the subject trip functions. The proposed change does not result in any system hardware modification or new plant configuration. The requested change to the existing calibration interval does not impact any FSAR safety analysis involving the Control Rod Block System. Operability is still assured and Control Rod Block Functions are still provided as required. Therefore, it is concluded that

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there is not a significant increase in the probability or consequence of an accident previously evaluated.

2. The proposed change to correct the calibration interval for control rod block instrumentation meets the intent of Technical Specification requirements for assuring operation of equipment as designed. This change does not relieve the operation of the Control Rod Block Instrumentation from existing requirements and this instrumentation system is still bounded by the assumptions used in the safety analysis. Based upon past operational history, current functional testing and maintenance performed at Vermont Yankee adequately assure operation as designed. The proposed change does not involve any change in Technical Specification setpoints, plant operation, redundancy, protective function or design basis of the plant. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Changing the calibration interval for the SRM and IRM "Detector Not Fully Inserted" Function from "not to exceed once per week" to "NA" does not affect any existing safety margins. Operation, testing and maintenance of this control rod block instrumentation will remain the same. The change is considered an Administrative change since it is believed to be correcting an error. None of the surveillances and testing presently performed on the instrumentation will change. Also, there are no additional surveillances required to be performed on this instrumentation. System function and design basis is maintained. Assurance that Control Rod Block Instrumentation operates within limits determined to be acceptable continues to be provided. Based upon the above, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

The Commission has provided guidance for the application of the standards in 10CFR50.92 by providing certain examples (51FR7751, dated March 6, 1986) of actions likely to involve no significant hazards consideration. One of these examples (i) is a purely administrative change to the Technical Specifications; 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 Commission example since it involves correcting a Technical Specification entry but not deleting any of the present surveillance or testing performed on the subject equipment.

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

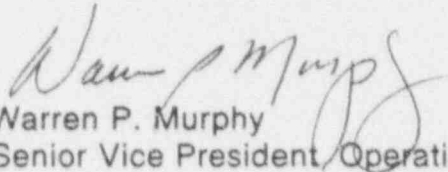
Schedule of Change

The proposed change will be incorporated into 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 on this matter, please contact us.

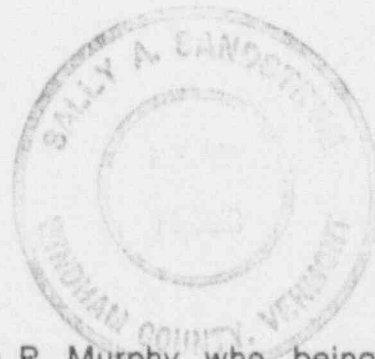
Very truly yours,

Vermont Yankee Nuclear Power Corporation

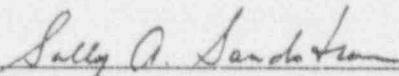
  
Warren P. Murphy  
Senior Vice President, Operations

cc: USNRC Region I Administrator  
USNRC Resident Inspector, VYNPS  
USNRC Project Manager, VYNPS

STATE OF VERMONT     )  
                                                  ) SS  
WINDHAM COUNTY         )



Then personally appeared before me, Warren P. Murphy, who, being duly sworn, did state that he is Senior Vice President, Operations of Vermont Yankee Nuclear Power Corporation, that he is 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.

  
\_\_\_\_\_  
Sally A. Sandstrum     Notary Public  
My Commission Expires February 10, 1995