

VERMONT YANKEE NUCLEAR POWER CORPORATION

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November 3, 1998
BVY 98-118

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Reference: (a) Letter, VYNPC to USNRC, Technical Specifications Proposed Change No. 180
– Administrative Change, BVY 96-06, dated February 5, 1996

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Technical Specifications Proposed Change No. 205
Administrative Change

Pursuant to 10 CFR 50.90, Vermont Yankee Nuclear Power Corporation (VYNPC) hereby requests that Facility Operating License DPR-28 be amended to incorporate the changes described in the enclosed attachments. The changes represent a number of minor corrections or clarifications which enhance the clarity of the Technical Specifications without materially changing meaning or application. This Proposed Change to Technical Specifications supercedes Reference (a).

Most of the proposed changes were identified during an earlier task which entailed reformatting the Technical Specifications; however, to facilitate that effort no changes were made in the text at that time to correct errors. Since completion of that effort a thorough review was conducted of the Technical Specifications to identify any administrative changes which would enhance the document. The identified changes include correction of typographical and other minor administrative errors. In some cases slight wording changes have been made to enhance the usability of the document and achieve consistency within the Technical Specifications. To further improve nomenclature, component identification numbers have been added in certain cases to improve specificity and consistency.

See Attachment A for a description and details regarding each change requested.

VYNPC has found that the proposed changes, when measured against the standards in 10 CFR 50.92, involve no significant hazards considerations. In this regard, the changes have been determined to be purely administrative in nature or in some cases may be deemed to constitute additional restrictions.

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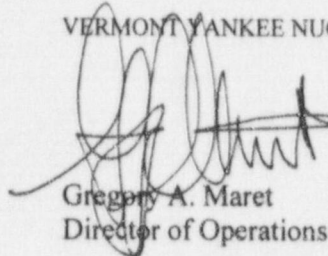
The following Attachments are included in support of this Proposed Change:

- Attachment A - Description and Bases for Changes
- Attachment B - Safety Considerations
- Attachment C - Environmental Assessment
- Attachment D - Listing of Affected Technical Specifications Pages
- Attachment E - Marked-Up Technical Specifications Pages
- Attachment F - Revised Technical Specifications Pages

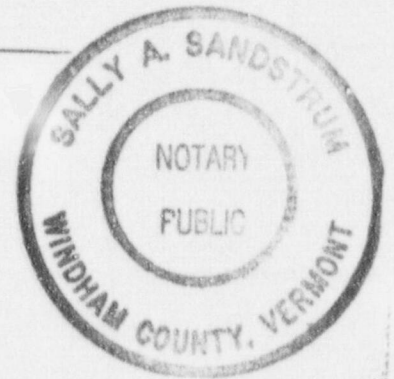
If you have any questions regarding this matter, please contact us.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

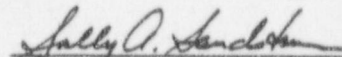


Gregory A. Maret
Director of Operations



STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Gregory A. Maret, who being duly sworn, did state that he is Director 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.


Sally A. Sandstrum, Notary Public
My Commission Expires February 10, 1999

cc: USNRC Region I Administrator
USNRC Project Manager – VYNPS
USNRC Resident Inspector – VYNPS
Vermont Department of Public Service

ATTACHMENT A
DESCRIPTION AND BASES FOR CHANGES
TECHNICAL SPECIFICATIONS PROPOSED CHANGE NO. 205
VERMONT YANKEE NUCLEAR POWER STATION
LICENSE NO. DPR-28, DOCKET NO. 50-271
(BVY 98-118)

Attachment A to BVY 98-118
Vermont Yankee Nuclear Power Station
Technical Specifications Proposed Change No. 205
Description and Bases for Changes
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No.	Page	Section	Description and Basis for Change
1	ii	TOC	<ul style="list-style-type: none"> • Change: Add sections 3.2.J, 3.2.K, and 3.2.L to the Table of Contents • Corrects an error in the Table of Contents by adding sections of the Technical Specifications not currently included in the Table of Contents. This achieves consistency by having all major sections of the Technical Specifications listed in the Table of Contents
2	17	B2.1.H	<ul style="list-style-type: none"> • Change "available" to "availability" • Corrects a typographical error
3	20	3.1	<ul style="list-style-type: none"> • Change "operbilty" to "operability" • Corrects a typographical error
4	20	4.1	<ul style="list-style-type: none"> • Change "instrumenttion" to "instrumentation" • Corrects a typographical error
5	21	T3.1.1	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors. • Note for all changes within Proposed Change-205 involving instrument tag numbers: Instrument tag numbers are indicative of the device (instrument) providing the required function and are not inclusive of all components in the associated instrument channel. This is consistent with the methodology previously used to define instrument channels providing a Technical Specifications function. Other controlled documents provide definition of all required components within a Technical Specifications instrument channel.
6	22	T3.1.1	<ul style="list-style-type: none"> • In one of the column headings, change "Min. No." to "Minimum Number" • Achieves consistency in the Technical Specifications, specifically with the same column heading on page 21.
7	22	T3.1.1	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
8	22	T3.1.1	<ul style="list-style-type: none"> • Change: Add Table title to page • Achieves consistency in the Technical Specifications by having Table titles at the top of pages
9	23	T3.1.1 Notes	<ul style="list-style-type: none"> • Change "lead" to "load" in Note 3.c. • Corrects a typographical error

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No.	Page	Section	Description and Basis for Change
10	25	T4.1.1	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. Component identification numbers are not repeated if the component was identified by number in the corresponding LCO table. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors.
11	27	T4.1.2	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
12	29	B3.1	<ul style="list-style-type: none"> • Change "on FSAR Page 7.5-8" to "in FSAR Section 7.5.5.4" in last line of the 6th paragraph. • Corrects an error and provides consistency within the Technical Specifications' Bases by referencing FSAR sections instead of page numbers
13	29	B3.1	<ul style="list-style-type: none"> • Change "Instrumentation (pressure switches) is..." to "Instrumentation is..." in the first line of the last paragraph • Corrects an error (the description was not inclusive of all sensors provided for this function)
14	33	B4.1.A	<ul style="list-style-type: none"> • Change "bi-stable" to "bistable" • Corrects a typographical error and achieves consistency in the Technical Specifications
15	34	3.2.A	<ul style="list-style-type: none"> • Change "3.5 the" to "3.5, the" in the 4th line • Corrects a typographical error
16	35	3.2.G	<ul style="list-style-type: none"> • Change "accident of abnormal" to "accident or abnormal" in the 9th line • Corrects a typographical error
17	36	3.2.I	<ul style="list-style-type: none"> • Change "operative" to "operable" in the 4th line • Corrects a typographical error and/or achieves consistent, defined terminology in the Technical Specifications
18	36	3.2.K	<ul style="list-style-type: none"> • Change "operative" to "operable" in the 4th line • Corrects a typographical error and achieves consistent, defined terminology in the Technical Specifications
19	38	T3.2.1	<ul style="list-style-type: none"> • Change: Capitalize each word in heading of last column from "...Conditions for Operation are Not Satisfied" to "...Conditions For Operation Are Not Satisfied" • Achieves consistency within the Technical Specifications
20	38	T3.2.1	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors

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No.	Page	Section	Description and Basis for Change
21	39	T3.2.1	<ul style="list-style-type: none"> Change: Capitalize each word in heading of last column from "... Conditions for Operation are Not Satisfied" to "... Conditions For Operation Are Not Satisfied" Achieves consistency within the Technical Specifications
22	39	T3.2.1	<ul style="list-style-type: none"> Change: Add component identification numbers Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
23	39	T3.2.1	<ul style="list-style-type: none"> Change trip function "RHR Pump A & C Discharge Pressure" to "RHR Pump (A-D) Discharge Pressure" This change corrects an error in the existing Technical Specifications in that only two of the four RHR pumps are listed. This trip function is applicable to all four RHR pumps, not just A & C.
24	40	T3.2.1	<ul style="list-style-type: none"> Change: Capitalize each word in heading of last column from "... Conditions for Operation are Not Satisfied" to "... Conditions For Operation Are Not Satisfied" Achieves consistency within the Technical Specifications
25	40	T3.2.1	<ul style="list-style-type: none"> Change: Add component identification numbers Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
26	41	T3.2.1	<ul style="list-style-type: none"> Change: Capitalize each word in heading of last column from "... Conditions for Operation are Not Satisfied" to "... Conditions For Operation Are Not Satisfied" Achieves consistency within the Technical Specifications
27	41	T3.2.1	<ul style="list-style-type: none"> Change: Add component identification numbers Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
28	42	T3.2.1	<ul style="list-style-type: none"> Change: Capitalize each word in heading of last column from "... Conditions for Operation are Not Satisfied" to "... Conditions For Operation Are Not Satisfied" Achieves consistency within the Technical Specifications
29	42	T3.2.1	<ul style="list-style-type: none"> Change: Add component identification numbers and reformat the component identification number of the third item (i.e., Time Delay) listed under "Trip Function" from "2E-K5A and B" to "2E-K5A/B" Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This additional nomenclature and change in format achieve consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors

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No.	Page	Section	Description and Basis for Change
30	43	T3.2.1	<ul style="list-style-type: none"> • Change: Capitalize each word in heading of last column from "...Conditions for Operation are not Satisfied" to "...Conditions For Operation Are Not Satisfied" • Achieves consistency within the Technical Specifications
31	43	T3.2.1	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
32	44	T3.2.1 Notes	<ul style="list-style-type: none"> • Change "one-out-of-two" to "one-out-of-two" in Note 4 • Corrects a typographical error and achieves consistency in the Technical Specifications
33	45	T3.2.2	<ul style="list-style-type: none"> • Change: Capitalize each word in heading of last column from "...Conditions for Operation are Not Satisfied" to "...Conditions For Operation Are Not Satisfied" • Achieves consistency within the Technical Specifications
34	45	T3.2.2	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
35	46	T3.2.2	<ul style="list-style-type: none"> • Change: Capitalize each word in heading of last column from "...Conditions for Operation are not Satisfied" to "...Conditions For Operation Are Not Satisfied" • Achieves consistency within the Technical Specifications
36	46	T3.2.2	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
37	47	T3.2.2	<ul style="list-style-type: none"> • Change: Capitalize each word in heading of last column from "...Conditions for Operation are not Satisfied" to "...Conditions For Operation Are Not Satisfied" • Achieves consistency within the Technical Specifications
38	47	T3.2.2	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors

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No.	Page	Section	Description and Basis for Change
39	49	T3.2.3	<ul style="list-style-type: none"> • Change the heading of last column from "... Conditions for Operation are not Met" to "... Conditions For Operation Are Not Satisfied" • Corrects the heading to achieve consistency within the Technical Specifications
40	49	T3.2.3	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
41	50	T3.2.4	<ul style="list-style-type: none"> • Change the heading of last column from "... Condition for Operation: are Not Met" to "... Conditions For Operation Are Not Satisfied" • Corrects the heading to achieve consistency within the Technical Specifications
42	51	T3.2.5	<ul style="list-style-type: none"> • Change: Add component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
43	53	T3.2.6	<ul style="list-style-type: none"> • Change component identification numbers and add further designation of components • Changes component identification to add additional designation or clarify designation. In two cases, designation of temperature elements (TE) was deleted since this provided superfluous information. By adding and clarifying component designation these changes represent nomenclature changes and achieve consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
44	54	T3.2.6	<ul style="list-style-type: none"> • Change containment hydrogen/oxygen "meter" to "recorder" in two places • Corrects an error by providing the proper terminology for these components
45	54	T3.2.6	<ul style="list-style-type: none"> • Change: Add and correct component identification numbers • Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors • Corrects an error in that the first item listed under "Type of Indication" should be changed from "Meter Z1-2-1A/B" to "Meter Z1-2-1A/B"
46	55a	T3.2.7	<ul style="list-style-type: none"> • Change: Inserts a new page • For consistency and clarity within the Technical Specifications, this change notes that Table 3.2.7 was intentionally deleted.

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No.	Page	Section	Description and Basis for Change
47	56	T3.2.8 Notes	<ul style="list-style-type: none"> Change footnote heading from "Table 3.2.7" to "Table 3.2.8" Corrects error by providing the proper Table number
48	57	T3.2.9	<ul style="list-style-type: none"> Change: Add component identification numbers Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
49	63	T4.2.1	<ul style="list-style-type: none"> Change: Move Note 4 from two places in "Trip Function" column to "Functional Test" column Corrects error in column location where note occurred in the Table, consistent with other Technical Specifications; there is no change to existing requirements by this change
50	71a	T4.2.7	<ul style="list-style-type: none"> Change: Inserts a new page For consistency and clarity within the Technical Specifications, this change notes that Table 4.2.7 was intentionally deleted.
51	74	T4.2 Notes	<ul style="list-style-type: none"> Change: In Note 4, change the fourth word of the first sentence from "expected" to "excepted". Corrects a typographical error
52	81a	3.3.A.2	<ul style="list-style-type: none"> Change "control rod driven" to "control rod drives" in the 1st line Corrects a typographical error
53	88	3.3.F	<ul style="list-style-type: none"> Change "Specification" to "Specifications" in the 1st line Corrects a typographical error
54	88	3.3.F	<ul style="list-style-type: none"> Change "3.3B through D" to "3.3.B through 3.3.D" Corrects a typographical error and clarifies this Specification to achieve consistency within the Technical Specifications.
55	90	B3.3/4.3	<ul style="list-style-type: none"> Change, "report" to "Report" in item #4 Corrects a typographical error
56	92	4.4.A	<ul style="list-style-type: none"> Change: Re-number second set of paragraphs from "1" and "2" to "3" and "4" Corrects a typographical error and/or achieves consistency in numbering of paragraphs within the Technical Specifications
57	93	4.4.A	<ul style="list-style-type: none"> Change: Re-number "3" and "4" to "5" and "6" Corrects a typographical error and/or achieves consistency in numbering of paragraphs within the Technical Specifications
58	105	3.5.D.3	<ul style="list-style-type: none"> Change "subsystem" to "subsystem(s)" in the 11th and 16th lines Corrects a typographical or grammatical error and achieves consistency within the Technical Specifications. Depending upon the circumstances, one or more subsystems may be affected

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No.	Page	Section	Description and Basis for Change
59	105	4.5.D.3	<ul style="list-style-type: none"> Change "subsystem" to "subsystem(s)" in the 7th line Corrects a typographical error and/or achieves consistency within the Technical Specifications. Depending upon the circumstances, one or more subsystems may be affected
60	106	3.5.E.3	<ul style="list-style-type: none"> Change "...reduced to 120 psig..." to "...reduced to \leq 120 psig..." in the 7th line Clarifies the intent of the corrective action required and is at least as restrictive as the current requirement. This was possibly a typographical error of omission. Corrects the wording of the Technical Specification to achieve consistency within the Technical Specifications in addressing process variable limits
61	107	3.5.F.3	<ul style="list-style-type: none"> Change "...reduced to 100 psig..." to "...reduced to \leq 100 psig..." in the 7th line Clarifies the intent of the corrective action required and is at least as restrictive as the current requirement. This was possibly a typographical error of omission. Corrects the wording of the Technical Specification to achieve consistency within the Technical Specifications in addressing process variable limits
62	107	4.5.G.1	<ul style="list-style-type: none"> Change "...normal operating pressure..." to "...normal reactor operating pressure..." in the 4th line from bottom of page Clarifies and adds consistency within the Technical Specifications by clarifying this Specification, which is similar to Technical Specification 4.5.E for HPCI system (may have been a typographical error)
63	108	3.5.G.3	<ul style="list-style-type: none"> Change "...reduced to 120 psig..." to "...reduced to \leq 120 psig..." in the 7th line Clarifies the intent of the corrective action required and is at least as restrictive as the current requirement. This was possibly a typographical error of omission. Corrects the wording of the Technical Specification to achieve consistency within the Technical Specifications in addressing process variable limits
64	108	3.5.H.1	<ul style="list-style-type: none"> Change "standby diesel generators" to "emergency diesel generators" in the 2nd line Adds consistency to the Technical Specifications by using the same equipment terminology (e.g., Technical Specification 3.10.A.1)
65	108	3.5.H.1	<ul style="list-style-type: none"> Change "...Low Pressure Core Cooling and Containment Cooling..." to "...LPCI, Core Spray and Containment Cooling..." in the 9th and 10th lines Adds consistency and specificity to the Technical Specifications by using the same equipment terminology used elsewhere in the Technical Specifications
66	108	4.5.H.1	<ul style="list-style-type: none"> Change "standby diesel generators" to "emergency diesel generators" in the 1st line Adds consistency to the Technical Specifications by using the same equipment terminology (e.g., Technical Specification 3.10.A.1)

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No.	Page	Section	Description and Basis for Change
67	118	3.6.B.2	<ul style="list-style-type: none"> Change chloride ion concentration from "0.01 ppm" to "0.1 ppm" in the 10th line This change corrects a typographical error. By letters dated May 4, 1994 (BVY 94-49) and July 19, 1994 (BVY 94-74) VYNPC submitted to NRC reformatted versions of the Technical Specifications to change page orientation from landscape to portrait format. Due to a typographical error, this value was incorrectly transcribed by VYNPC at that time. A review of the docket confirms that the subject value in the initial VYNPS Technical Specification was 0.1 ppm, and the only change to this page (Amendment 91 issued on October 28, 1985) did not change this value.
68	119	3.6.B.5	<ul style="list-style-type: none"> Change "3.6.B." to "3.6.B" in the 1st line Corrects a typographical error by deleting a period
69	140	B3.6/4.6	<ul style="list-style-type: none"> Change "CFR" to "10CFR" in the 3rd line of the 3rd paragraph Corrects a typographical error and/or adds consistency and specificity to the Technical Specifications
70	140	B3.6/4.6	<ul style="list-style-type: none"> Change the section heading from "Coolant Chemistry" to "B. Coolant Chemistry" Corrects a typographical error and adds consistency to the Technical Specifications by alpha-numerically designating sections of the Technical Specifications
71	140	B3.6/4.6	<ul style="list-style-type: none"> Change "3.8.C.1a" to "3.8.E.1" in the 4th line of the 4th paragraph on the page Corrects a typographical or administrative error in referencing the appropriate Technical Specification
72	140	B3.6/4.6	<ul style="list-style-type: none"> Change "postulate" to "postulated" in the 4th line of the 5th paragraph on the page Corrects a typographical or administrative error in using the proper verb tense
73	142	B3.6/4.6	<ul style="list-style-type: none"> Change "4.6.B.2" to "4.6.B.1.b" in the 5th line of the 1st paragraph on the page Corrects a typographical or administrative error in referencing the appropriate Technical Specification
74	142	B3.6/4.6.C	<ul style="list-style-type: none"> Change "leakage;" to "leakage," in the 6th line of the 1st paragraph Corrects a typographical or administrative error in using the proper form of punctuation
75	142a	B3.6/4.6.E	<ul style="list-style-type: none"> Change "Table 4.2-4" to "Table 4.2-3" in the 1st line Corrects a typographical or administrative error in referencing the appropriate Technical Specification
76	166a	B3.7	<ul style="list-style-type: none"> Change "3.7" to "4.7" in the heading Corrects a typographical or administrative error in appropriately designating this section of the Bases to the Technical Specifications
77	168	B4.7.A	<ul style="list-style-type: none"> Change "will be" to "was" in the 5th line of the 1st paragraph Corrects a typographical or administrative error in using the proper verb tense
78	193	T3.9.1	<ul style="list-style-type: none"> Change: Add component identification numbers in three places Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors

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No.	Page	Section	Description and Basis for Change
79	195	T3.9.2	<ul style="list-style-type: none"> Change: Add component identification numbers in several places Changes nomenclature by designating component identification numbers of associated instrumentation with trip functions. This achieves consistency with other Technical Specifications where component identification numbers are already included. An additional benefit to including component numbers in the Technical Specifications is the avoidance of confusion and the potential for errors
80	198	T3.9.3	<ul style="list-style-type: none"> Change "meteorological" to "meteorological!" in the 5th and 10th lines in the second column Corrects a typographical error
81	202	T3.9.4 Notes	<ul style="list-style-type: none"> Change: In the 4th line under note (a), add a "<" (less than symbol) before the "1.0" and delete the period after "1.0" Corrects a typographical or administrative error by adding a necessary symbol
82	206	T4.9.2 Notes	<ul style="list-style-type: none"> Change "indicate" to "indicates" in note (1)(a) Corrects a typographical or administrative error in using the proper verb tense
83	209	B3.9.C	<ul style="list-style-type: none"> Change "...Regulatory Guides 4.3 (C.2.a) and 4.1 (C.2.b)..." to "...Regulatory Guide 4.1 (C.2.b)..." in the 10th line of the 2nd paragraph Corrects an error by removing reference to Regulatory Guide 4.3 which is no longer active and has been withdrawn by the NRC.
84	233	4.12.E	<ul style="list-style-type: none"> Change "control rods" to "control rod's" in the 4th line Corrects a typographical or administrative error in grammar
85	237	B3.12/4.12.A	<ul style="list-style-type: none"> Change "Specification 3.2" to "Specification 3.3" in the 6th line of the 2nd paragraph Corrects a typographical or administrative error in referencing the appropriate Technical Specification
86	244	3.13.C.1	<ul style="list-style-type: none"> Change "3.12.C.2" to "3.13.C.2" in the 2nd line Corrects a typographical or administrative error in referencing the appropriate Technical Specification
87	249	4.13.G.1.d	<ul style="list-style-type: none"> Change the paragraph designation from "d." to "c." Corrects a typographical or administrative error in sequentially designating this section. There currently is no Technical Specifications section 4.13.G.1.c
88	250	T3.13.A.1	<ul style="list-style-type: none"> Change: Separate item #2 "Switchgear Room" into two fire areas and re-number the remaining list of sensors Dividing the switchgear room into two designated areas achieves consistency with how other rooms and fire areas are specified for fire detection in the Technical Specifications and also achieves consistency with the 1982 plant design change which divided the switchgear room into two (east and west) fire areas. This design change was originally incorporated into Technical Specifications in Amendment No. 154 dated March 6, 1998, except for the associated changes to this Table. This change also adds additional restrictions by ensuring that at least ten operable fire detection sensors will be in each fire area (i.e., east and west areas).

Notes:

- Page and Section numbers refer to the current (NRC-approved) version of VYNPS Technical Specifications
- Txxx under the Section heading denotes a table. Bxxx denotes a Bases section.

ATTACHMENT B

SAFETY CONSIDERATIONS

TECHNICAL SPECIFICATIONS PROPOSED CHANGE NO. 205

VERMONT YANKEE NUCLEAR POWER STATION

LICENSE NO. DPR-28, DOCKET NO. 50-271

(BVY 98-118)

1. SAFETY BASIS FOR CHANGES

There are no adverse safety implications associated with these changes. The changes proposed in the attached Technical Specifications pages are administrative in nature and do not impact any FSAR safety analysis or change the function of any equipment important to safety. Plant operation is unaffected as a result of these changes.

Since the proposed changes are considered administrative enhancements to the Technical Specifications to correct obvious errors and textual inconsistencies and to enhance usability, approval of these changes will have no detrimental effect on plant safety. No safety functions have been negatively affected.

The proposed changes have been reviewed by the Plant Operations Review Committee and the Vermont Yankee Nuclear Safety Audit and Review Committee.

2. SAFETY ANALYSIS AND SIGNIFICANT HAZARDS CONSIDERATION

The U.S. Nuclear Regulatory Commission has provided standards for determining whether a no significant hazards consideration exists as stated in 10CFR50.92(c). A proposed amendment to an operating license involves a no significant hazards consideration if 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; or (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.

VYNPC proposes to make administrative changes to the Technical Specifications to correct errors, add consistency within the Technical Specifications, and make nomenclature changes to support and enhance usability of the Technical Specifications.

VYNPC has evaluated the proposed Technical Specification changes and determined that they do not involve a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10CFR50.92, operation of VYNPS in accordance with this change would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated, because:
 - The proposed changes are purely administrative in nature and have no effect on plant hardware, plant design, safety limit setting, or plant system operation and therefore do not modify or add any initiating parameters that would significantly increase the probability or consequences of an accident previously evaluated.
 - No new modes of operation are introduced by the proposed changes such that adverse consequences would result. Accordingly, the consequences of previously analyzed accidents are not affected by this proposed license amendment.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated, because:
- These changes do not affect the operation of any systems or components, nor do they involve any potential initiating events that would create any new or different kind of accident. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated for the Vermont Yankee Nuclear Power Station.
- (3) Involve a significant reduction in a margin of safety, because:
- These proposed changes do not affect any equipment involved in potential initiating events or safety limits. Therefore, it is concluded that the proposed changes do not involve a significant reduction in a margin of safety.
 - Administrative changes, as such, do not constitute any significant hazards considerations.

The Nuclear Regulatory Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples of amendments that are and are not considered likely to involve significant hazards consideration. This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations.

Example (i) of "Examples of Amendments That Are Considered Not Likely To Involve Significant Hazards Considerations", published in the Federal Register at 48 FR 14870 relates to 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. The changes proposed by this amendment request are purely administrative changes to the Technical Specifications and meet the above criterion in that they involve the correction of errors, achieve consistency within the Technical Specifications and/or change nomenclature. Some changes, although administrative, may also be deemed to constitute additional restrictions. As such they would meet Example (ii) of the above-cited guidance provided by the Nuclear Regulatory Commission. In each case, such changes are considered not likely to involve significant hazards considerations.

Therefore, based on the criteria established in 10 CFR 50.92(c), the guidance provided in the Federal Register, and the above considerations, VYNPC has determined that these proposed changes do not constitute a significant hazards consideration.

ATTACHMENT C
ENVIRONMENTAL ASSESSMENT
TECHNICAL SPECIFICATIONS PROPOSED CHANGE NO. 205
VERMONT YANKEE NUCLEAR POWER STATION
LICENSE NO. DPR-28, DOCKET NO. 50-271
(BVY 98-118)

Attachment C to BVY 98-118
Environmental Assessment

Vermont Yankee Nuclear Power Corporation has evaluated the proposed license amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided therein. This conclusion has been determined because the changes requested: (i) do not pose significant hazards consideration, (ii) do not involve a significant increase in the amounts, and no significant changes in the types, of any effluents that may be released offsite, and (iii) do not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed action is not required.

ATTACHMENT D

LISTING OF AFFECTED TECHNICAL SPECIFICATIONS PAGES

TECHNICAL SPECIFICATIONS PROPOSED CHANGE NO. 205

VERMONT YANKEE NUCLEAR POWER STATION

LICENSE NO. DPR-28, DOCKET NO. 50-271

(BVY 98-118)

Attachment D to BVY 98-118
Listing of Affected Technical Specifications Pages

Replace the pages of the Vermont Yankee Nuclear Power Station Technical Specifications listed below with the revised pages. Page numbers in parentheses () indicate new, additional pages¹.

ii	40	57	140
17	41	63	142
20	42	(71a)	142a
21	43	74	166a
22	44	81a	168
23	45	88	193
25	46	90	195
27	47	92	198
29	49	93	202
33	50	105	206
34	51	106	209
35	53	107	233
36	54	108	237
38	(55a)	118	244
39	56	119	249
			250

Note:

¹ To account for previously removed tables and the resultant break in sequential numbering of Technical Specifications tables, two new pages were added (i.e., pages 55a and 71a) for completeness and to avoid confusion.

ATTACHMENT E

MARKED-UP TECHNICAL SPECIFICATIONS PAGES
TECHNICAL SPECIFICATIONS PROPOSED CHANGE NO. 205
VERMONT YANKEE NUCLEAR POWER STATION
LICENSE NO. DPR-28, DOCKET NO. 50-271
(BVY 98-118)