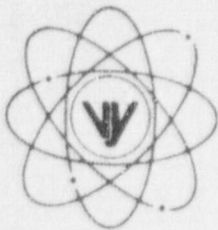


# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO  
ENGINEERING OFFICE

580 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

July 25, 1997  
BVY 97-95

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 89-44, dated May 12, 1989
  - (c) Letter, USNRC to VYNPC, Nvy 87-04, dated January 8, 1987
  - (d) Letter, USNRC to VYNPC, Nvy 92-96, dated June 5, 1992
  - (e) Letter, USNRC to VYNPC, Nvy 92-208, dated November 12, 1992
  - (f) Letter, VYNPC to USNRC, BVY 93-119, dated October 22, 1993
  - (g) Letter, VYNPC to USNRC, Fvy 87-41, dated April 10, 1987
  - (h) Letter, VYNPC to USNRC, BVY 94-43, dated April 15, 1994
  - (i) Letter, USNRC to VYNPC, IR 89-05, Nvy 89-97, dated May 4, 1989
  - (j) Letter, USNRC to VYNPC, Nvy 89-121, dated May 31, 1989
  - (k) Letter, USNRC to VYNPC, Nvy 94-174, dated October 6, 1994
  - (l) Telecon, USNRC to VYNPC, dated July 18, 1997

## Subject: Deferral of ATWS Rule (10CFR50.62) Technical Specifications

In Reference (b) Vermont Yankee provided its proposed Technical Specifications for the ATWS Rule, 10CFR50.62, as requested by NRC in Reference (c). NRC comments on the proposed changes were issued in Reference (d), which included a request for updated Technical Specification pages. Following meetings between NRC and Vermont Yankee, documented in Reference (e), Vermont Yankee submitted updated Technical Specifications pages in Reference (f). Since submitting Reference (f), review of this proposed change has been delayed by other higher priority matters and resolution of concerns regarding alternate rod injection (ARI) system diversity.

Vermont Yankee is operating in full compliance with the requirements of the ATWS Rule. As documented in Reference (g), Vermont Yankee's recirculation pump trip system is based on the "Monticello design" and fully meets the requirements of 10CFR50.62(c)(5). Additionally, Vermont Yankee plant procedure OP4611 requires that the standby liquid control (SLC) tank boron concentration be maintained such that the SLC system meets the performance criteria of 10CFR50.62(c)(4). Finally, the ARI system was modified during Vermont Yankee's 1995 refueling outage to fully comply with the requirements of 10CFR50.62(c)(3) as documented in Reference (h). NRC review of Vermont Yankee's compliance with the requirements of the ATWS Rule are documented in References (i), (j) and (k).

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United States Nuclear Regulatory Commission  
July 25, 1997  
Page 2 of 2

Given the delay in processing this proposed change, Vermont Yankee's compliance with the ATWS Rule, our commitment to the Improved Technical Specifications and our discussions with NRC staff [Reference (I)], Vermont Yankee has decided to withdraw Proposed Change No. 147.

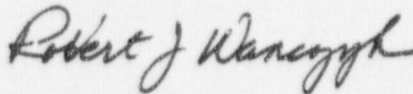
With this letter Vermont Yankee makes the following commitment:

- Vermont Yankee will incorporate any necessary ATWS Rule Technical Specification changes within our Improved Technical Specification Submittal.

We trust that this submittal is satisfactory. However, if additional information or clarification is required, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



*for*

Donald A. Reid  
Senior Vice President, Operations

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