



ATOMIC POWER COMPANY •

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September 12, 1985
MN-85-158

Proposed Change 81
Supplement 2

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

References: (a) License No. DPR-36 (Docket No. 50-309)
(b) MYAPCo Letter to USNRC dated April 3, 1981 (FMY-81-54)
Proposed Change 81
(c) USNRC Letter to MYAPCo dated September 14, 1982
(d) MYAPCo Letter to USNRC dated October 28, 1982 (MN-82-216)
(e) USNRC Letter to MYAPCo dated September 1, 1983
(f) MYAPCo Letter to USNRC dated February 29, 1984 (MN-84-33)
(g) MYAPCo Letter to USNRC dated April 10, 1984 (MN-84-58)
Proposed Change 81, Supplement 1

Subject: Maine Yankee Snubber Technical Specifications - Proposed Change 81,
Supplement 2

Gentlemen:

Attached is Supplement 2 to Maine Yankee's proposed change to our shock suppressor technical specification. This supplement incorporates comments from Dr. Kenneth Heitner and Mr. John Hudson of the NRC staff. The attached revision to Proposed Change 81 is essentially the same as Reference (g) with three exceptions. They are as follows:

1. T.S. 3.20.A - The NRC expressed concern that our original proposed change did not require snubbers be operable while shut down regardless of the operability requirements for the supported system. Snubbers supporting the RHR system fall into this category.

T.S. 3.20.A has been modified to require the snubbers supporting the RHR system be operable when that system is required by technical specifications. In order to perform maintenance RH-HSS-101 or 102 could be removed from service for up to 8 hours under the exception, for up to 6 hours when the RHRS is isolated for upper guide structure removal (T.S. 3.13) or when all fuel has been removed from the reactor.

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2. T.S. 4.9.A.4 - In our original change we proposed a note to our visual inspection criteria stating that "(i) noperable snubbers connected to a common reservoir represent one failure for determining next inspection interval". The NRC expressed concern because they felt the note may be used to loosen inspection requirements if multiple failures were found. Note #2 of T.S. 4.9.A.4 has been clarified to resolve the NRC's concern.
3. T.S. 4.9.B - The NRC questioned the need of an exception to the functional test requirements excluding the 50,000 lb. snubbers from functional testing. Maine Yankee has the capability and has tested 50,000 lb. snubbers in the past. The exception has been deleted from the attachment.

The remaining pages of Reference (g) have been included for completeness. Changes associated with Reference (g) are noted by a double bracket in the right-hand margin and changes associated with this proposal are noted by a triple bracket.

In accordance with Section 50.90, Maine Yankee proposes to modify Appendix A of Operating License DPR-36 as follows:

- A. Replace page 3.20-1 of Specification 3.20 with the enclosed revised pages 3.20-1 and 3.20-2.
- B. Replace pages 4.9-1 through 4.9-4 of Specification 4.9 with the enclosed revised pages 4.9-1 through 4.9-3.
- C. Replace page 5.10-2 of Specification 5.10 with the enclosed revised page 5.10-2.

This request for amendment has been evaluated using the criteria of 10 CFR 50.92, and Maine Yankee has concluded that no significant hazards considerations are involved by operating under this proposed amendment.

The proposed change adds additional and more restrictive limiting conditions for operation while the reactor is shut down and decay heat is being removed by the residual heat removal (RHR) system. The change provides the same seismic protection for the reactor cooling systems during shut down conditions as is provided during power operation. The remaining changes enclosed are administrative in nature and do not affect the design or operation of the Maine Yankee plant. For these reasons, Maine Yankee has concluded that this request for amendment does not involve an increase in the probability or the consequences of an accident previously analyzed, a new accident not previously analyzed, or a decrease in the margin of safety of a technical specification basis.

This supplemental proposed change has been reviewed by the Plant Operations Review Committee and the Nuclear Safety Audit and Review Committee. The Plant Operations Review Committee has concluded that these supplemental changes to Proposed Change No. 81 do not constitute an unreviewed safety question.

United States Nuclear Regulatory Commission
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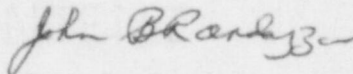
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Licensing fees for this proposed change were submitted with References (b) and (f).

A copy of this supplemental proposed change is being provided to the State of Maine in accordance with 10 CFR 50.91.b.1.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY



John B. Randazza
Vice President

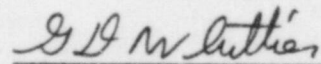
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cc: Mr. Edward J. Butcher, Jr.
Dr. Thomas E. Murley
Mr. Cornelius F. Holden
Mr. Clough Toppan

Enclosures: a. Specification 3.20 (2 pages)
b. Specification 4.9 (3 pages)
c. Specification 5.10 (1 page)

STATE OF MAINE)
)ss
COUNTY OF LINCOLN)

Then personally appeared before me, John B. Randazza, who being duly sworn did state that he is a Vice President of Maine Yankee Atomic Power Company, that he is duly authorized to execute and file the foregoing request in the name and on behalf of Maine Yankee Atomic Power Company, and that the statements therein are true to the best of his knowledge and belief.



Notary Public

G.D. WHITTIER
NOTARY PUBLIC, MAINE
MY COMMISSION EXPIRES OCTOBER 19, 1991