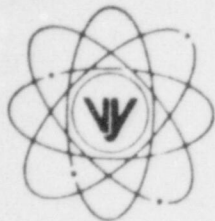


VERMONT YANKEE NUCLEAR POWER CORPORATION

PROPOSED CHANGE NO. 138



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

FVY 87-48

REPLY TO:

ENGINEERING OFFICE

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

April 28, 1987

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Office of Nuclear Reactor Regulation
Mr. T. Murley, Director

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

Dear Sir:

Subject: Proposed Administrative Change to Technical Specifications

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 190, 190a, 192, 194, 195, and 206 of the Vermont Yankee Technical Specifications with the attached revised Pages 190, 190a, 192, 194, 195, and 206. These revised pages reflect administrative changes to Section 6 of the Technical Specifications.

The proposed change involving the revision of Pages 190, 192, and 194 reflects a reorganization of station management. Specifically, the change involves the reorganization of the current Chemistry and Health Physics Department into two separate departments and a change to the Plant Operations Review Committee (PORC) membership to reflect the two supervisors in this area.

The change to Page 190a reinstates a change previously granted in Amendment 79, but was inadvertently deleted in Amendment 87.

The change to Page 195 is proposed to update Section 6.2.A.5 of the Technical Specifications by eliminating a reference to a non-existent group designation and clearly defining authority for designating PORC alternates.

Further, the change proposed to Page 206 revises Section 6.5.C regarding review and approval of procedures.

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REASON AND BASES FOR CHANGE

The reorganization of the existing Chemistry and Health Physics Department is based on an evaluation of the complexity of the department's functions. Specialization in several areas has increased dramatically over the years including radwaste packaging and shipment, chemistry, dosimetry, respiratory protection, hazardous wastes, and environmental monitoring. As a result, the management and supervision of these activities has become significantly more difficult and time consuming. To enhance management of these areas, two separate departments are created consisting of the Radiation Protection Department and the Chemistry Department. The addition of the Chemistry Supervisor and the Radiation Protection Supervisor to the PORC membership is consistent with the current membership by the existing Chemistry and Health Physics Supervisor and further enhances the review capabilities of the PORC.

The change to Page 190a reinstates the requirement that either the Health Physicist or the Radiation Protection Supervisor (formerly the Chemistry and Health Physics Supervisor) shall meet the qualifications of Regulatory Guide 1.8, Revision 1. Reference to the Chemistry and Health Physics Supervisor was inadvertently deleted by Amendment 87 and was previously approved in Amendment 79.

The change to Section 6.2.A.5 (Page 195) is proposed to eliminate reference to a no longer functioning plant group. This change will now clearly place the authority for designating alternate PORC representatives with the Plant Manager.

The change to Section 6.5.C is proposed to streamline the review and approval process for plant procedures. Currently, this Specification requires a review and approval of procedures by the Manager of Operations in addition to the Plant Manager. The proposed change eliminates the review and approval by the Manager of Operations and adds the requirement of review and approval by the applicable department supervisor. The review process for plant procedures at Vermont Yankee will ensure that each procedure revision is thoroughly reviewed at a minimum by the department supervisor. Further, this individual must consider the need for additional multi-disciplinary reviews and can require additional reviews by other plant personnel. This process will ensure that the procedures are thoroughly reviewed prior to approval by the applicable department supervisor and subsequent review and approval by the Plant Manager.

Further, based on past initiatives as a result of INPO evaluations, Vermont Yankee is preparing a Procedure Writer's Guideline that will further enhance the procedure revision process by ensuring consistency in the content and format of all plant procedures. This guideline will also provide for a verification of planned procedure revisions prior to approval of the change. It is presently anticipated that this guideline will be implemented no later than May 31, 1987. This guideline will be revised on a biennial schedule based on input from audits and user feedback. Because of this significant improvement to the review system, the Manager of Operations approval is no longer necessary. The Manager of Operations will continue to receive feedback on procedural effectiveness through audits, LER's and other such mechanisms.

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SAFETY CONSIDERATIONS

This proposed change is administrative in nature and has no safety or environmental significance.

This change has been reviewed by the Vermont Yankee Nuclear Safety Audit and Review Committee (NSARC).

SIGNIFICANT HAZARDS CONSIDERATIONS

The Commission has provided standards for determining whether a significant hazards consideration exists (10CFR50.92(c)). A proposed amendment to an operating license involves 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; 2) create the possibility of a new or different kind of accident previously evaluated; or 3) involve a significant reduction in a margin of safety. Vermont Yankee has determined, per 10CFR50.92, the following:

The organizational changes described in Section 6 (Administrative Controls) do not involve a significant increase in the probability or consequences of an accident previously evaluated because they are strictly organizational changes which will enhance station management and PORC review over plant activities associated with safe and effective operations. These changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because they likewise enhance organizational and station management review over plant activities related to safe and effective operations. The changes do not involve a significant reduction in a margin of safety because they are intended to enhance management and PORC attention related to safe and effective operations, as well as clarify the Technical Specifications regarding certain management authority by removing a reference to a no longer functioning plant group, and additionally eliminating a redundant step in the review and approval of plant procedures with no adverse impact in plant safety or safety margins. Therefore, Vermont Yankee has determined that these changes have no safety significance and that the proposed amendment will not alter any of the accident analyses.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples. The examples of actions involving no significant hazards include 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.

Based on the above, we have concluded that this change does not constitute a significant hazards consideration, as defined in 50.92(c), since the proposed changes to Section 6 (Administrative Controls) will have little or no impact on public health and safety and are strictly administrative in nature.

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FEE DETERMINATION

In accordance with the provisions of 10CFR170.12, we are enclosing an application fee of \$150.00.

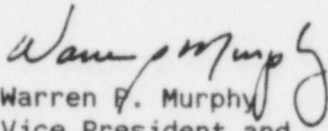
SCHEDULE OF CHANGE

This proposed change will be incorporated into the Vermont Yankee Technical Specifications as soon as practicable upon 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,

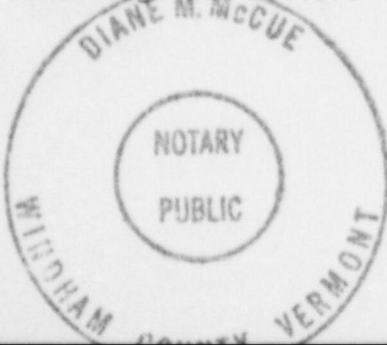
VERMONT YANKEE NUCLEAR POWER CORPORATION

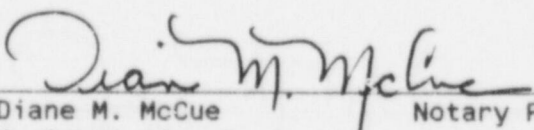

Warren P. Murphy
Vice President and
Manager of Operations

RWC/dm
Attachment
cc: Vermont Department of Public Service
120 State Street
Montpelier, Vermont 05602
Attention: Mr. G. Tarrant, Chairman

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Warren P. Murphy, who, being duly sworn, did state that he is 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 M. McCue Notary Public
My Commission Expires February 10, 1991