VERMONT YANKEE NUCLEAR POWER CORPORATION

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BVY 99-139

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

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Technical Specification Proposed Change No. 224
Reactor Power Distribution Limits Applicability

Pursuant to 10CFR50.90, Vermont Yankee (VY) hereby proposes to amend its Facility Operating License, DPR-28, by incorporating the attached proposed change into the VY Technical Specifications. This proposed change revises the applicability for the reactor power distribution limits and the Average Power Range Monitor (APRM) gain adjustments. The applicability is proposed to be revised to operation at $\geq$ 25% Rated Thermal Power.

This change is consistent with the BWR/4 Standard Technical Specifications[1], reconciling existing VY Technical Specification inconsistencies in applicabilities for power distribution limit determinations.

Attachment 1 to this letter contains supporting information and the safety assessment of the proposed change. Attachment 2 contains the determination of no significant hazards consideration. Attachment 3 provides the marked-up version of the current Technical Specification pages and Bases pages. Attachment 4 is the retyped Technical Specification pages and Bases pages.

VY has reviewed the proposed Technical Specification change in accordance with 10CFR50.92 and concludes that the proposed change does not involve a significant hazards consideration.

VY has also determined that the proposed change satisfies the criteria for a categorical exclusion in accordance with 10CFR51.22(c)(9) and does not require an environmental review. Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment needs to be prepared for this change.

Upon acceptance of this proposed change by the NRC, VY requests that a license amendment be issued for implementation within 60 days of the effective date of the amendment.

A001

[1] NUREG 1433, Standard Technical Specifications General Electric Plants, BWR/4, Revision 1, dated April 7, 1995.

If you have any questions on this transmittal, please contact Mr. Jeffrey T. Meyer at (802) 258-4105.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Robert J. Wanczyk
Director of Safety and Regulatory Affairs

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Robert J. Wanczyk, who, being duly sworn, did state that he is Director of Safety and Regulatory Affairs 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, 2003

Attachments

cc: USNRC Region 1 Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS
Vermont Department of Public Service

Docket No. 50-271
BVY 99-139

Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 224

Reactor Power Distribution Limits Applicability

Supporting Information and Safety Assessment of Proposed Change

INTRODUCTION

The reactor power distribution limits are the Average Planar Linear Heat Generation Rate (APLHGR), the Linear Heat Generation Rate (LHGR), and the Minimum Critical Power Ratio (MCPR). The reactor power distribution limits are explicitly governed by Vermont Yankee (VY) Technical Specifications Section 3.11, Reactor Fuel Assemblies. Regarding the reactor power distribution limits:

1. The applicability for the reactor power distribution limits as stated in LCOs 3.11.A, 3.11.B and 3.11.C is "during steady state power operation."
2. "Steady state power operation" is not defined in the Technical Specifications.
3. The Surveillance Requirements for determination of the reactor power distribution limits are stated in 4.11.A, 4.11.B and 4.11.C.
4. The applicability for these Surveillance Requirements is "during reactor operation at $\geq$ 25% rated thermal power." (4.11.C for MCPR also has an applicability of "following any change in power level or distribution that would cause operation with a limiting control rod pattern as described in the bases for Specification 3.3.B.6.")
5. Technical Specification Bases 4.11.A states (regarding APLHGR, LHGR and MCPR): "For a limiting value to occur below 25% of rated thermal power, an unreasonably large peaking factor would be required, which is not the case for operating control rod sequences."
6. Technical Specification Bases 4.11.C states (regarding MCPR): "At core thermal power levels less than or equal to 25%, the reactor will be operating at minimum recirculation pump speed and the moderator void content will be very small. For all designated control rod patterns which may be employed at this point, operating plant experience indicated that the resulting MCPR value is in excess of requirements by a considerable margin. With this low void content, any inadvertent core flow increase would only place operation in a more conservative mode relative to MCPR. During initial start-up testing of the plant, a MCPR evaluation will be made at 25% thermal power level with minimum recirculation pump speed. The MCPR margin will thus be demonstrated such that future MCPR evaluation below this power level will be shown to be unnecessary."

The determination of the LHGR is required to calculate the Maximum Fraction of Limiting Power Density (MFLPD). MFLPD is the largest value of the fraction of limiting power density in the core. The fraction of limiting power density is the LHGR existing at a given location divided by the specified LHGR limit for that bundle type.

The calculation of MFLPD is required for the adjustment of the Average Power Range Monitor (APRM) gains. To maintain the validity of the APRM setpoints, the APRM gain must be adjusted when operating under conditions of excessive power peaking. This maintains acceptable margin to the Fuel Cladding Integrity Safety Limit and the fuel cladding 1% plastic strain limit. The condition of excessive power peaking is determined by the ratio of the actual power peaking to the limiting power peaking at Rated Thermal Power (RTP). This ratio is equal to the ratio of the core limiting MFLPD to the fraction of rated (thermal) power (FRP), where FRP is the measured thermal power divided by the RTP. Excessive power peaking exists when:

$$\frac{\text{MFLPD}}{\text{FRP}} > 1$$

indicating that MFLPD is not decreasing proportionately to the overall power reduction, or conversely, that power peaking is increasing. To maintain margins similar to those at RTP conditions, the excessive power peaking is compensated by a gain adjustment on the APRMs.

Technical Specifications Section 2.1 and Surveillance Requirement 4.1.B require the determination of MFLPD for the purpose of APRM gain adjustment. Since MFLPD is derived from LHGR, these

specifications implicitly direct the determination of LHGR. Regarding the determination of MFLPD for the purpose of APRM gain adjustment:

1. Specification 2.1.A.1.a, APRM Flux Scram Trip Setting (Run Mode), requires APRM gain adjustment based upon the ratio of MFLPD to FRP and has an applicability of "when the mode switch is in the RUN position."
2. Specification 2.1.B.1, APRM Rod Block Trip Setting, requires APRM gain adjustment based upon the ratio of MFLPD to FRP and has no defined applicability.
3. Surveillance Requirement 4.1.B, Reactor Protection System, requires determination of MFLPD and adjustment of APRM gains with an applicability of "once a day during reactor power operation."
4. "Reactor Power Operation" is defined by Technical Specifications as "any operation with the mode switch in the 'Startup/Hot Standby' or 'Run' position with the reactor critical and above 1% rated thermal power."

Therefore, current Technical Specifications require the determination of LHGR, for which LCO 3.11.B explicitly defines the applicability as "during steady state power operation" (a phrase not defined in Technical Specifications), at the following different frequencies:

- During reactor operation at $\geq$ 25% RTP,
- When the mode switch is in the RUN position,
- No defined applicability, and
- Once a day during any operation with the mode switch in the "Startup/Hot Standby" or "Run" position with the reactor critical and above 1% RTP.

The BWR/4 Standard Technical Specifications provide the template for a single consistent applicability for these determinations. This applicability is "during operation at $\geq$ 25% Rated Thermal Power." This proposed change adopts this single, consistent BWR/4 Standard Technical Specifications applicability for all of the reactor power distribution limits, thereby clarifying the specifications.

Other associated changes to support this applicability change are also proposed herein. They are:

1. An applicability of "when the mode switch is in the RUN position" is added to Specification 2.1.B.1, APRM Rod Block Trip Setting. The absence of an applicability is an obvious administrative oversight with the intent clearly being for the function to be applicable when the APRM Flux Scram Trip Setting (Run Mode) is applicable; i.e., when the mode switch is in the RUN position.
2. For Surveillance Requirements 4.1.B, 4.11.A, 4.11.B, and 4.11.C, a frequency is added consistent with the BWR/4 Standard Technical Specifications. It requires that LHGR, APLHGR, MCPR, and MFLPD be determined and APRM gains adjusted "once within 12 hours after $\geq$ 25% Rated Thermal Power."
3. For LCOs 3.11.A, 3.11.B and 3.11.C, the required action for exceeding a reactor power distribution limit for > 2 hours is changed consistent with the BWR/4 Standard Technical Specifications. The requirement to bring the reactor to "the shutdown conditions within 36 hours" is changed to "< 25% Rated Thermal Power within 4 hours."
4. For LCOs 3.11.A, 3.11.B and 3.11.C, the requirement to initiate action within 15 minutes to restore operation to within the prescribed limits, if a reactor power distribution limit is exceeded, is relocated to the Bases. It is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.

SAFETY ASSESSMENT

Revising the reactor power distribution limits applicability and incorporating the associated changes consistent with the BWR/4 Standard Technical Specifications is not a safety concern as explained in Table 1. Table 1 details each proposed change and provides the basis and safety assessment for each change. The Change Numbers correspond to the annotations in Attachment 3, Marked-up Version of the Current Technical Specifications.

Table 1

Change #	Current Technical Specification	Proposed Change
1 & 2	Section 2.1, Fuel Cladding Integrity, Specification A.1.a, APRM Flux Scram Trip Setting (Run Mode) states as the applicability: "When the mode switch is in the RUN position ..."	
1	It then states as a requirement: "In the event of operation with the ratio of MFLPD to FRP greater than 1.0, the APRM gain shall be increased by the ratio: MFLPD/FRP, where: MFLPD = maximum fraction of limiting power density... [and] FRP = fraction of rated power (1593 MWt)."	"In the event of operation ..." is proposed to be changed to "In the event of operation at $\geq$ 25% Rated Thermal Power ..."
2	It then adds: "In the event of operation with the ratio of MFLPD to FRP equal to or less than 1.0, the APRM gain shall be equal to or greater than 1.0."	"In the event of operation ..." is proposed to be changed to "In the event of operation at $\geq$ 25% Rated Thermal Power ..."

Basis / Safety Assessment: The current applicability for the APRM system gain adjustments is "when the mode switch is in the RUN position." The proposed change establishes the Applicability for MFLPD and APRM system gain adjustments to be when Rated Thermal Power is $\geq$ 25%. Therefore, this change is less restrictive but acceptable, since both MFLPD determination and APRM gain adjustment are directly associated with enforcing the Fuel Cladding Integrity Safety Limit for MCPR, and the Surveillance Requirement for MCPR in Technical Specification 3.11 is only required during reactor operation at $\geq$ 25% RTP. At RTP levels < 25% RTP, the reactor is operating with substantial margin to the MCPR limits.

Since this change is consistent with the current MCPR Surveillance Requirements as fully supported by Bases 4.11.C, there is no impact on safety.

Change #	Current Technical Specification	Proposed Change
3	Section 2.1, Fuel Cladding Integrity, Specification B.1, APRM Rod Block Trip Setting, does not state an applicability. It does contain the identical APRM gain requirements as stated above for Specification A.1.a.	"When the mode switch is in the RUN position" is proposed to be added as the applicability for this specification.
Basis / Safety Assessment: The APRM Flow Biased Scram function applicability is "When the mode switch is in the RUN position" (see current Technical Specification 2.1.A.1.a). The current absence of an applicability for the associated rod block function is an apparent administrative error. The APRM rod block function is not assumed in any accident or transient analyses and, therefore, has no assumed applicability. By design, the function is a part of the scram and rod block circuitry only when the reactor mode switch is in the RUN position. Furthermore, Technical Specifications Table 3.2.5, Control Rod Block Instrumentation, requires the APRM Upscale (Flow Bias) and APRM Downscale functions to be operable in the "Run" mode. This change is administrative with no impact on safety.		
4 & 5	Section 2.1, Fuel Cladding Integrity, Specification B.1, APRM Rod Block Trip Setting, contains the identical APRM gain requirements as stated above (Changes 1 and 2) for Specification A.1.a.	"In the event of operation ..." is proposed to be changed to "In the event of operation at $\geq$ 25% Rated Thermal Power ..."
Basis / Safety Assessment: The APRM flow biased rod block function is not assumed in any accident or transient analyses and only serves to initiate a rod block to terminate rod withdrawal prior to reaching the APRM flow biased scram setpoint. Therefore, the applicability for the APRM gain adjustments for the flow biased rod block function is being changed to match the revised applicability for the APRM gain adjustments for the flow biased scram function. As discussed in the basis for Changes 1 and 2, there is no impact on safety.		

Change #	Current Technical Specification	Proposed Change
6	Surveillance Requirement 4.1.B, Reactor Protection System, states: "Once a day during reactor power operation the maximum fraction of limiting power density and fraction of rated power shall be determined and the APRM system gains shall be adjusted by the ratios given in Technical Specifications 2.1.A.1.a and 2.1.B." Surveillance Requirements 4.11.A, 4.11.B, and 4.11.C require determination of APLHGR, LHGR, and MCPR daily during operation at $\geq$ 25% rated thermal power.	A frequency is proposed to be added to Surveillance Requirements 4.1.B, 4.11.A, 4.11.B and 4.11.C that states: "Once within 12 hours after $\geq$ 25% Rated Thermal Power." An associated discussion is proposed for Bases 4.1.B and Bases 4.11.A. The word, "thereafter," is added to Specifications 4.11.A, 4.11.B, and 4.11.C to clarify the requirements to then perform (after the initial surveillances have been met) the required surveillances once per day when operating at $\geq$ 25% Rated Thermal Power. In addition, the unnecessary descriptors, "reactor" and "reactor power" are deleted from these same Specifications. This deletion is an administrative change and does not alter any technical requirements.

Basis / Safety Assessment: The requirement to check MFLPD, APLHGR, LHGR, and MCPR within limits once within 12 hours after $\geq$ 25% RTP is consistent with the BWR/4 Standard Technical Specifications, which state as a basis for the allowance: "The 12 hour allowance after THERMAL POWER $\geq$ 25% RTP is achieved is acceptable given the large inherent margin to operating limits at low power levels."

This (more restrictive) change ensures that within a reasonable time after reaching 25% RTP, the reactor is operating within the assumptions of the safety analysis. As such, there is no impact on safety.

Change #	Current Technical Specification	Proposed Change
7	Specification 4.1.B, Reactor Protection System, states: "Once a day during reactor power operation the maximum fraction of limiting power density and fraction of rated power shall be determined and the APRM system gains shall be adjusted by the ratios given in Technical Specifications 2.1.A.1.a and 2.1.B."	The stated frequency is proposed to be changed to "once a day during operation at ≥ 25% Rated Thermal Power thereafter." Thereafter, during operation at ≥ 25% Rated Thermal Power, the thermal limits will be checked daily. The word, "thereafter," is added to clarify this requirement. ("Thereafter" refers to the additional frequency as discussed in Change #6 above.) In addition, the unnecessary descriptor, "reactor power" is deleted from this requirement. This deletion is an administrative change and does not alter any technical requirements. The Bases of Surveillance Requirement 4.1.B is proposed to be changed to reflect this change.
	Specification 3.1.B states: "During operation with the ratio of MFLPD to FRP greater than 1.0 either: a. The APRM System gains shall be adjusted by the ratios given in Technical Specifications 2.1.A.1 and 2.1.B or b. The power distribution shall be changed to reduce the ratio of MFLPD to FRP."	The stated applicability is proposed to be changed to "During operation at ≥ 25% Rated Thermal Power with the ratio of MFLPD to FRP greater than 1.0 ..." making this Specification agree with its revised surveillance requirement and with the revised applicabilities of the Specifications to which it refers.

Basis / Safety Assessment: The allowance to not determine the ratio of MFLPD to FRP until after reaching 25% RTP (and adjust APRM gains accordingly) is acceptable, since both MFLPD determination and APRM gain adjustments are directly associated with enforcing the fuel cladding integrity safety limit for MCPR, and the Surveillance Requirements for MCPR in Technical Specification 3.11 are only required during reactor operation at ≥ 25% Rated Thermal Power. At RTP levels < 25%, the reactor is operating with substantial margin to the MCPR limits and this Specification is not required.

Since this change is consistent with the current MCPR Surveillance Requirements as fully supported by Bases 4.11.C, there is no impact on safety.

Change #	Current Technical Specification	Proposed Change
8	Specifications 3.11.A, Average Planar Linear Heat Generation Rate, 3.11.B, Linear Heat Generation Rate, and 3.11.C, Minimum Critical Power Ratio have an applicability of "During steady state power operation."	It is proposed to change the applicability to "During operation at $\geq$ 25% Rated Thermal Power."
Basis / Safety Assessment: The applicability of Surveillance Requirements 4.11.A, 4.11.B, and 4.11.C which require verification of the reactor power distribution limits is during reactor power operation at $\geq$ 25% Rated Thermal Power. This is because the reactor power distribution limits are primarily derived from fuel design evaluations and LOCA and transient analyses that are assumed to occur at high power levels. At < 25% RTP, the reactor is operating with substantial margin to the reactor power distribution limits. This is fully supported by the current Technical Specifications Bases 4.11.A and 4.11.C. Recognizing the margin that exists below 25% RTP, the BWR/4 Standard Technical Specifications define an applicability of $\geq$ 25% RTP for the reactor power distribution limits and the APRM gain adjustments. The change in applicability is supported by the current Technical Specifications Bases. The margins are such that violating the reactor power distribution limits is not a concern at < 25% RTP. Therefore, this change has no impact on safety.		
9	Specifications 3.11.A, Average Planar Linear Heat Generation Rate, 3.11.B, Linear Heat Generation Rate, and 3.11.C, Minimum Critical Power Ratio, state as the required action for the APLHGR, LHGR, or MCPR limit being exceeded: "If the APLHGR [LHGR, MCPR] is not returned to within prescribed limits within two (2) hours, the reactor shall be brought to the shutdown condition(s) within 36 hours."	It is proposed to change "the shutdown conditions" to "< 25% Rated Thermal Power."
Basis / Safety Assessment: When required actions are not met, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. Since the applicability is $\geq$ 25% Rated Thermal Power, then the specification is changed to require exiting that applicability. This is an administrative change, reflecting the revised applicability. As such, there is no impact on safety.		

Change #	Current Technical Specification	Proposed Change
10	Specifications 3.11.A, Average Planar Linear Heat Generation Rate, 3.11.B, Linear Heat Generation Rate, and 3.11.C, Minimum Critical Power Ratio, state as the required action for the APLHGR, LHGR, or MCPR limit being exceeded: "If the APLHGR [LHGR, MCPR] is not returned to within prescribed limits within two (2) hours, the reactor shall be brought to the shutdown condition(s) within 36 hours."	It is proposed to change "36 hours" to "4 hours." Together with Change #9 above, if these power distribution limits are not returned to within prescribed limits within two hours, the reactor must be brought to < 25% RTP within four hours.
Basis / Safety Assessment: All of the proposed changes follow the BWR/4 Standard Technical Specifications template, which reduces the time for exiting the applicability to 4 hours from 36 hours. The BWR/4 Standard Technical Specifications Bases states that the 4 hour Completion Time is reasonable, based on operating experience, to reduce THERMAL POWER to < 25% in an orderly manner and without challenging plant systems. This is a more restrictive change with no impact on safety.		
11	Bases 4.11.A states: "The APLHGR, LHGR and MCPR shall be checked daily to determine if fuel burnup, or control rod movement has caused changes in power distribution."	The phrase "when operating at ≥ 25% Rated Thermal Power" is added after "checked daily."
Basis / Safety Assessment: This is an administrative change to clarify the Bases regarding the applicability of the surveillance requirements. The current Technical Specifications only require the checks "daily during reactor operation at ≥ 25% rated thermal power." This change is purely administrative with no impact on safety.		

Change #	Current Technical Specification	Proposed Change
12	Specifications 3.11.A, Average Planar Linear Heat Generation Rate, 3.11.B, Linear Heat Generation Rate, and 3.11.C, Minimum Critical Power Ratio, state: "If at any time during steady state operation it is determined by normal surveillance that the limiting value for APLHGR [LHGR, MCPR] is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the APLHGR [LHGR, MCPR] is not returned to within prescribed limits within two (2) hours, the reactor shall be ..."	Together with proposed Change #8 above, it is proposed to change the action statement as follows: "If at any time during operation at $\geq$ 25% Rated Thermal Power it is determined by normal surveillance that the limiting value for APLHGR [LHGR, MCPR] is being exceeded, APLHGR(s) [LHGR(s), MCPR(s)] shall be returned to within prescribed limits within two (2) hours; otherwise, the reactor shall be ..." The 15 minutes to initiate action requirement is relocated to the Bases Section 4.11.B in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.

Basis / Safety Assessment: This change is consistent with the BWR/4 Standard Technical Specifications. The 2 hour completion time for restoration of the limit is retained in the Specification. This completion time allows appropriate actions to be evaluated by the operator and completed in a timely manner.

The 2 hour completion time defines the period in which a reactor power distribution limit can be exceeded prior to taking action to exit the applicability. Therefore, the relocated details concerning the initiation of restoration activities are not required to be in the Technical Specifications to provide adequate protection of the public health and safety, and thus, there is no impact on safety.

Docket No. 50-271
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Attachment 2

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 224

Reactor Power Distribution Limits Applicability

Determination of No Significant Hazards Consideration

Pursuant to 10CFR50.92, Vermont Yankee (VY) has reviewed the proposed change and concludes that the change does not involve a significant hazards consideration since the proposed change satisfies the criteria in 10CFR50.92(c).

1. The operation of Vermont Yankee Nuclear Power Station in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Each of the proposed changes can be categorized as one of the following: 1) a change in the applicability for the reactor power distribution limits and their derivatives to $\geq$ 25% RTP; 2) an imposition of more restrictive requirements in support of the $\geq$ 25% RTP applicability change consistent with the BWR/4 Standard Technical Specifications; 3) a purely administrative change that has no impact on the technical content; or 4) relocation to the Bases of details not required to be in Technical Specifications. The changes in the first category are justified by current Surveillance Requirements 4.11.A, 4.11.B, and 4.11.C and their Bases. The changes are additionally supported by and consistent with the BWR/4 Standard Technical Specifications and their Bases. Since the changes standardize the applicability for the reactor power distribution limits to the current Technical Specifications applicability for the surveillances that explicitly govern the determinations, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. More stringent and purely administrative changes also do not involve a significant increase in the probability or consequences of an accident previously evaluated. The two hour completion time defining the period in which a reactor power distribution limit can be exceeded prior to taking action to exit the applicability is retained in the Technical Specifications. Details regarding the initiation of those actions do not meet the criteria of 10CFR50.36 for retention in the Technical Specifications. Therefore, their relocation does not involve a significant increase in the probability or consequences of an accident previously evaluated.

1. The operation of Vermont Yankee Nuclear Power Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

None of the proposed changes affects any parameters or conditions that could contribute to the initiation of any accident. No new accident modes are created. No safety-related equipment or safety functions are altered as a result of these changes. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The operation of Vermont Yankee Nuclear Power Station in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

As stated in the Bases for Surveillance Requirements 4.11.A, 4.11.B, and 4.11.C, at thermal power levels < 25% RTP, the reactor is operating with substantial margin to the reactor power distribution limits. Since both MFLPD determination and APRM gain adjustment are directly associated with enforcing the Fuel Cladding Integrity Safety Limit for MCPR, those requirements are only necessary when the MCPR limit is applicable. Therefore, the applicabilities for the determination of the reactor power distribution limits and their derivatives can be standardized consistent with the existing Surveillance Requirements of Section 4.11 and the BWR/4 Standard Technical Specifications without involving a significant reduction in a margin of safety. Purely administrative changes with no technical impact, the imposition of more stringent requirements, and the relocation of details that do not meet the criteria of 10CFR50.36 for retention in the Technical Specifications cannot negatively impact margin of safety. Therefore, those changes do not involve a significant reduction in a margin of safety.

Summary No Significant Hazards Consideration

On the basis of the above, VY has determined that operation of the facility in accordance with the proposed change does not involve a significant hazards consideration as defined in 10CFR50.92(c), in that it: (1) does not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) does not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) does not involve a significant reduction in a margin of safety.

In making this determination, Vermont Yankee has also reviewed the NRC examples of license amendments considered not likely to involve significant hazards considerations as provided in the final adoption of 10CFR50.92 published in the Federal Register, Volume 51, No. 44, dated March 6, 1986.