

VERMONT YANKEE NUCLEAR POWER CORPORATION

185 Old Ferry Road, Brattleboro, VT 05301-7002
(802) 257-5271

December 3, 1999
BVY 99-156

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

Reference: (a) Letter, VYNPC to USNRC, "Technical Specification Proposed
Change No. 224 - Reactor Power Distribution Limits Applicability," BVY
99-139, dated November 5, 1999

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 (Supplement)

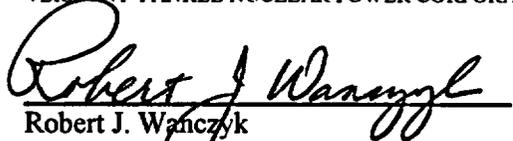
By Reference (a), Vermont Yankee (VY) requested that Facility Operating License DPR-28 be amended to incorporate certain changes to the Technical Specifications related to the applicability of reactor power distribution limits.

Attachment 2 to Reference (a) is the determination of no significant hazards consideration (NSHC) in support of the Proposed Change. Subsequent review of the NSHC identified a need for revision. Consequently, the NSHC determination has been revised and is re-submitted in its entirety as the enclosure to this letter. Please replace Attachment 2 to Reference (a) with the enclosed.

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

Sincerely,

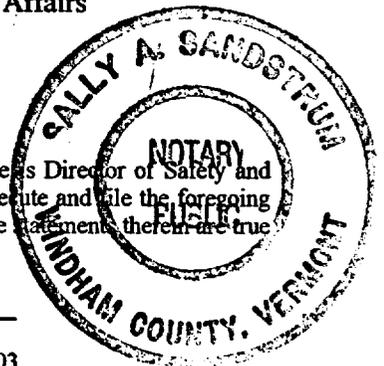
VERMONT YANKEE NUCLEAR POWER CORPORATION


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



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

Ac001

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Determination of No Significant Hazards Consideration**Description of amendment request:**

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 associated Bases. Below 25% rated thermal power considerable margin exists to power distribution limits. The changes are additionally supported by and consistent with the BWR/4 Standard Technical Specifications and their Bases.

More stringent and purely administrative changes also do not involve a significant hazards consideration. 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 hazards consideration.

Basis for no significant hazards determination:

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.**

The proposed change does not involve an increase in the probability or consequences of an accident previously evaluated because the revisions standardize and make consistent the applicability and actions for the reactor power distribution limits in the current Technical Specifications. Since reactor operation with these revised Specifications is fundamentally unchanged, no design or analytical acceptance criteria will be exceeded. As such, this change does not impact initiators of analyzed events or assumed mitigation of accident or transient events. The structural and functional integrity of plant systems is unaffected. Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. 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.

The proposed change does not affect 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 change 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.

At thermal power levels < 25% RTP, the reactor is operating with substantial margin to the reactor power distribution limits. The proposed change does not impact operation at power levels \geq 25% RTP and has no effect on any safety analysis assumption or initial condition. Thus, the margin of safety required for safety analyses are maintained. Therefore, the proposed change does 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, VY has also reviewed the 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.