

December 10, 1999

50-271

LICENSEE: Vermont Yankee Nuclear Power Corporation (VYNPC)

FACILITY: Vermont Yankee Nuclear Power Station

SUBJECT: SUMMARY OF MEETING ON DECEMBER 7, 1999, REGARDING ACTIVITIES AT VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. MA5876)

On December 7, 1999, representatives of VYNPC, licensee for the Vermont Yankee Nuclear Power Station met with members of the Nuclear Regulatory Commission (NRC) staff to discuss the June 15, 1999, Technical Specifications Proposed Change No. 217 for the Vermont Yankee Nuclear Power Station. The proposed amendment involves changes to surveillance test intervals and allowable out-of-service times. Enclosure 1 is a list of attendees and Enclosure 2 contains copies of handouts distributed at the meeting.

The staff requested that the licensee provide a letter clarifying portions of the submittal including the proposed wording for function-specific allowable out-of-service times and actions for specified emergency core cooling system actuation instrumentation. In addition, the staff requested that the licensee provide justification for certain allowable out-of-service times that were proposed. The licensee agreed to provide the information in a letter.

ORIGINAL SIGNED BY:
Richard P. Croteau, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

- Enclosures: 1. List of Attendees
2. Handouts

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 10, 1999

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A handwritten signature in black ink, appearing to read "R. Croteau".

Richard P. Croteau, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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cc w/encls: See next page

Vermont Yankee Nuclear Power Station

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NRC/VYNPC Meeting

December 7, 1999

List of Attendees

NAME

ORGANIZATION

Richard Croteau
Hukam Garg
Carl Schulten
Gautam Sen
William Drews

NRR
NRR
NRR
Vermont Yankee
Vermont Yankee

VY/NRC 12/7/99 MEETING AGENDA

- INTRODUCTION AND PLANT STATUS
(5 minutes)
- STI/AOT PRESENTATION
(15 minutes)
- ECCS FUNCTION SPECIFIC PRESENTATION
(5 minutes)
- TS ATTACHMENT 3- DETAILED REVIEW
(2.5 hours)
- SUMMARY AND ACTION ITEMS

Vermont Yankee Nuclear Station Application for Amendment of License

Surveillance Test Intervals (STIs) Extension and Allowable out-of-service Times (AOTs)

- Need for Change
- Technical Specification Proposal
- Operational Safety Benefits
- Supporting Documentation
- Deviations from Supporting Documentation
- Lessons Learned
- Summary (NSHC)

Vermont Yankee Nuclear Station

Application for Amendment of License

Need for Change

- Strict compliance with TS LCOs and Generic Letter 91-18 (Operability)
- Reduce unnecessary shutdown entries
- Reduce potential for inadvertent
 - Scrams
 - Primary Containment isolations
 - SGT and Secondary Containment isolations

Vermont Yankee Nuclear Station

Application for Amendment of License

Technical Specification Proposal

- Increase Surveillance Test Intervals (STIs) for Specified Instrumentation

RPS (SCRAM)

Isolation

ECCS

Rod Block

RCIC

Selected (RPT, Post-Accident
Monitoring)

Vermont Yankee Nuclear Station

Application for Amendment of License

Technical Specification Proposal (cont'd)

- Add Allowable Out-of-service Times (AOTs).
 - Add 6 hrs for required surveillance testing.
 - Add 12 hrs repair time for RPS (SCRAM) Instrumentation.
 - Add 24 hours repair time for instrumentation not common to RPS (SCRAM).
 - Add ECCS function specific AOTs and Actions.
- Remove APRM Downscale/IRM Trip Function RUN mode requirements.
 - Add SRM/IRM/APRM overlap surveillance.
- Relocate Power Monitors, editorial and administrative changes.
- Revise associated TS Bases

Vermont Yankee Nuclear Station

Application for Amendment of License

ECCS Function Specific AOTs Safety Benefits

- **“Loss of Function” review completed up front.**
- **Clear direction if outside AOT and “loss of function” statements.**
- **Specific system declared Inoperable in action rather than refer to other TS Sections.**

Justification

- **ECCS instrumentation involves more complex actions than RPS and Containment Isolation (pumps initiations, timers, valves opening and closing).**
- **VY TS implies and procedures allows only one channel to be tested at a time.**
- **Multiple channels failures are uncommon.**
- **AOTs and actions consistent with generic (unbracketed) Improved STS.**

Vermont Yankee Nuclear Station

Application for Amendment of License

Operational Safety Benefits

- Reduced Potential Inadvertent Plant Scrams/ESF Actuations
 - Reduction of time the protective instrument logic is in a half-Scram/trip condition.
 - Elimination of hurried atmosphere during repairs and tests which cause an increased risk of error.
 - Enhancement of BOP Predictive Maintenance Program.
 - Total reduction of ~ 3,000 test cycles per year on 7,350 components.

Vermont Yankee Nuclear Station

Application for Amendment of License

Supporting Documentation

- Supporting GE Topical Reports (Approved with NRC SERs)
 - GE Topical Report NEDC-30851P-A, "Technical Specification Improvement Analysis for BWR Reactor Protection System," March 1988
 - GE Topical Report NEDC-30851P-A, Supplement 1 "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988
 - GE Topical Report NEDC-30851P-A, Supplement 2 "Technical Specification Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," July 1986
 - GE Topical Report NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation, " July 1990
 - GE Topical Report NEDC-30936P-A, Parts 1 and 2, "BWR Owners Group Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation)," December 1988

Vermont Yankee Nuclear Station

Application for Amendment of License

Supporting Documentation (Cont'd)

- GE Topical Report GENE-770-06-1-A, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," December 1992
- GE Topical Report GENE-770-06-2-A, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," December 1992
- NUREG 1433, "Standard Technical Specification General Electric Plants, BWR/4," Revision 1
- NEDO - 31466 "Technical Specification Screening Criteria Application and Risk Assessment"

Vermont Yankee Nuclear Station

Application for Amendment of License

Deviations from Supporting Documentation

- Minor wording differences (overlap surveillance, ECCS function specific AOTs) between proposed TS and STS to maintain consistency within current TS (does not alter meaning).

Vermont Yankee Nuclear Station

Application for Amendment of License

Lessons Learned from Other Utilities

- Added SRM/IRM/APRM overlap surveillance (*Fitzpatrick Amendment No. 227, dated September 11, 1995*)
- AOT wording for ECCS (*FitzPatrick Amendment No.250 dated January 12, 1999*)
- RPS Tables (*Peach Bottom Amendment Nos. 210 and 214, ITS Conversion*)

Vermont Yankee Nuclear Station

Application for Amendment of License

Lessons Learned from Other Utilities (cont'd)

- Performed GE (NSSS) evaluation for added assurance that the proposed change is consistent with the design and licensing basis and that Neutron Monitoring requirements are properly applied in the Technical Specification (*Monticello Amendment No.50 dated August 25, 1987; Millstone Unit No.1 Amendment 103 dated October 27, 1997*).

Vermont Yankee Nuclear Station

Application for Amendment of License

Summary

- This Technical Specification change is being proposed as a Category 2, Item 1,2 and 6 Amendment, which is considered not to involve Significant Hazard consideration.
- Item 1 involves a purely administrative change to Technical Specifications; for example, a change to achieve consistency throughout the TS, correction of an error, or a change in nomenclature.
- Item 2 involves a change that constitutes an additional limitation, restriction, or control not presently included in the TS; for example, a more stringent surveillance requirement.
- Item 6 involves a change which may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin but where the results of the change are clearly within acceptable criteria.

Vermont Yankee Nuclear Station

Application for Amendment of License

Summary (cont'd)

- Will benefit VY by allowing better use of Plant resources as the result of reduced testing.
- Assuming approval, request a License Amendment which will be effective upon issuance and shall be implemented within 90 days of issuance. This latitude permits appropriate procedural/program revisions and training necessary to implement the proposed changes.