

VERMONT YANKEE NUCLEAR POWER CORPORATION

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BVY 02-09

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

Reference: (a) Letter, VYNPC to USNRC, "Technical Specification Proposed Change
No. 248, Alternate Train Testing," BVY 01-65, dated August 20, 2001.

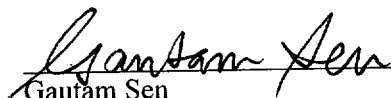
Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Replacement Pages for Proposed Change No. 248

Attached to this letter are four (4) replacement pages to our previous submittal (Reference a). The revised Technical Specification pages (106, 108, 111a and 112) incorporate Amendment 205 revisions, which were approved subsequent to our original submittal of Reference (a) and affected these same pages. No new changes are proposed by this submittal and these pages simply replace the corresponding retyped pages in our previous submittal.

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

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Gautam Sen
Licensing Manager

Attachment

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

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3.5 LIMITING CONDITION FOR OPERATION

2. From and after the date that the HPCI System is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding 14 days unless such system is sooner made operable, provided that:

- a. The RCIC System is immediately verified by administrative means to be operable, and

- b. During such 14 days all active components of the Automatic Depressurization System, the Core Spray Subsystems, the LPCI Subsystems, and the RCIC System are operable.

3. If the requirements of either Specification 3.5.E or Specification 4.5.E.1.c cannot be met, an orderly shutdown shall be initiated and the reactor pressure shall be reduced to ≤ 150 psig within 24 hours.

F. Automatic Depressurization System

1. Except as specified in Specification 3.5.F.2 below, the entire Automatic Depressurization Relief System shall be operable at any time the reactor steam pressure is above 150 psig and irradiated fuel is in the reactor vessel.
2. From and after the date that one of the four relief valves of the Automatic Depressurization Subsystem are made or found to be inoperable

4.5 SURVEILLANCE REQUIREMENT

- d. The HPCI System shall deliver at least 4250 gpm at normal reactor operating pressure when recirculating to the Condensate Storage Tank.

2. Deleted.

F. Automatic Depressurization System

Surveillance of the Automatic Depressurization System shall be performed as follows:

1. Operability testing of the relief valves shall be in accordance with Specification 4.6.E.
2. Deleted.

3.5 LIMITING CONDITION FOR OPERATION

- b. During such 14 days, the HPCI System is operable.
 3. If the requirements of either Specification 3.5.G or Specification 4.5.G.1.c cannot be met, an orderly shutdown shall be initiated and the reactor pressure shall be reduced to ≤ 150 psig within 24 hours.
- H. Minimum Core and Containment Cooling System Availability
1. During any period when one of the emergency diesel generators is inoperable, continued reactor operation is permissible only during the succeeding seven days, provided that all of the LPCI, Core Spray and Containment Cooling Subsystems connecting to the operable diesel generator shall be operable. If this requirement cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.
 2. Any combination of inoperable components in the Core and Containment Cooling Systems shall not defeat the capability of the remaining operable components to fulfill the core and containment cooling functions.
 3. When irradiated fuel is in the reactor vessel and the reactor is in either a refueling or cold shutdown condition, all Core and Containment Cooling Subsystems may be inoperable provided no work is permitted which has the potential for draining the reactor vessel.

4.5 SURVEILLANCE REQUIREMENT

- d. The RCIC System shall deliver at least 400 gpm at normal reactor operating pressure when recirculating to the Condensate Storage Tank.
- H. Minimum Core and Containment Cooling System Availability
1. Deleted.

BASES: 3.5 (Cont'd)

SSW pump, SSW valve, etc.), then reactor operation is limited to 15 days provided that during this time both the normal and emergency power supplies for the remaining operable equipment are also operable, in addition to requiring the operability of all remaining active components of the SSW system which perform a safety function and the alternate cooling tower fan.

If the SSW System would not be capable of performing its safety function for any reason, even without assuming a worst case single active failure, then the reactor must be placed in the cold shutdown condition within 24 hours.

E. High Pressure Coolant Injection System

The High Pressure Coolant Injection System (HPCIs) is provided to adequately cool the core for all pipe breaks smaller than those for which the LPCI or Core Spray Cooling Subsystems can protect the core.

The HPCIs meets this requirement without the use of outside power. For the pipe breaks for which the HPCIs is intended to function the core never uncovers and is continuously cooled; thus, no clad damage occurs and clad temperatures remain near normal throughout the transient. Reference: Subsection 6.5.2.2 of the FSAR.

In accordance with Specification 3.5.E.2, if the HPCI System is inoperable and the RCIC System is verified to be operable, the HPCI System must be restored to operable status within 14 days during reactor power operation. In this condition, adequate core cooling is ensured by the operability of the redundant and diverse low pressure emergency core cooling system (ECCS) injection and spray subsystems in conjunction with the Automatic Depressurization System (ADS). Also, the RCIC System will automatically provide makeup water at reactor operating pressures above 150 psig. During reactor power operation, immediate verification of RCIC operability is therefore required when HPCI is inoperable. This may be performed as an administrative check by examining logs or other information to determine if RCIC is out of service for maintenance or other reasons. It does not mean it is necessary to perform the surveillances needed to demonstrate the operability of the RCIC System. If operability of the RCIC System cannot be verified, however, Specification 3.5.E.3 requires that an orderly shutdown be initiated and reactor pressure reduced to ≤ 150 psig within 24 hours.

F. Automatic Depressurization System

The Automatic Depressurization System (ADS) consists of the four safety-relief valves and serves as a backup to the High Pressure Coolant Injection System (HPCI). ADS is designed to provide depressurization of the reactor coolant system during a small break loss-of-coolant accident if HPCI fails or is unable to maintain sufficient reactor water level. Since HPCI operability is required above 150 psig, ADS operability is also required above this pressure.

ADS operation reduces the reactor pressure to within the operating pressure range of the low pressure coolant injection and core spray systems, so that these systems can provide reactor coolant inventory makeup.

BASES: 3.5 (Cont'd)

The low pressure ECCS injection/spray subsystems consist of two core spray (CS) and two low pressure coolant injection (LPCI) subsystems. During cold shutdown and refueling conditions, each CS subsystem requires one motor driven pump, piping, and valves to transfer water from the suppression pool or condensate storage tank to the reactor pressure vessel (RPV). Also, during cold shutdown and refueling conditions, each LPCI subsystem requires one motor driven pump, piping, and valves to transfer water from the suppression pool to the RPV. Under these conditions, only a single LPCI pump is required per subsystem because of the larger injection capacity in relation to a CS subsystem. During shutdown and refueling conditions, LPCI subsystems may be considered operable during RHR system alignment and operation for decay heat removal, if those subsystems are capable of being manually realigned to the LPCI mode and are not otherwise inoperable. Because of low pressure and low temperature conditions during cold shutdown and refueling, sufficient time will be available to manually align and initiate LPCI subsystem operation to provide core cooling prior to postulated fuel uncover.

I. Maintenance of Filled Discharge Pipe

Full discharge lines are required when the core spray subsystems, LPCI subsystems, HPCI and RCIC are required to be operable to preclude the possibility of damage to the discharge piping due to water hammer action upon a pump start.