

From: Guzman, Richard
Sent: Friday, March 08, 2013 6:52 AM
To: 'Couture III, Philip'
Subject: Vermont Yankee - Request for Additional Information re: Change to TS 3.3.B Inoperable Control Rods (TAC No. MF0426)

Phil,

The NRC staff has reviewed the information provided in the subject license amendment request dated December 17, 2012 (ADAMS Accession No. ML12356A297), and has determined that additional technical justification is needed to support the review of the proposed license amendment. Below is the NRC staff's request for additional information (RAI). To support the timely review of this application, we request that you provide a formal response within 60 days of the date of this message. Please contact me if you have any questions.

RAI-1

In its application dated December 17, 2012, the licensee states that the proposed amendment to the VY Technical Specifications (TSs) would revise TS 3.3, "Control Rod System," Section B, "Control Rods" to provide action statements for inoperable control rods in accordance with similar actions specified in the Improved standard technical specifications (STS). Specifically, the proposed wording would allow continued operation with an inoperable control rod, provided the control rod(s) are fully inserted within 3 hours and disarmed (electrically or hydraulically) within 4 hours. The licensee states that these completion times are consistent with STS, are reasonable, and provide time to insert and disarm the control rods in an orderly manner without unnecessarily challenging plant systems, however, there is inadequate discussion of why the current TS are overly restrictive or any given operating history to show that the current TS are burdensome. Also, the licensee does not state whether there are any deviations between VY plant design and the design assumed in the STS (nor is there a comparison of the two designs).

Provide additional information (i.e., plant-specific justification, operational experience, and/or technical basis) to justify that the proposed use of the STS (i.e., BWR/4 LCO 3.1.3 Condition C of the STS) satisfies NRC regulations and is appropriately conservative. Stating that the proposed change to the plant's TS is similar and/or consistent with the STS without a safety basis is not an acceptable justification, particularly when the proposed change would make the plant less conservative. For example, the current TS require the reactor to be in hot shutdown in 12 hours if certain conditions cannot be met. Adopting the standard TS would allow continued operation once the control rod is inserted and disarmed within certain completion times.

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US NRC
301-415-1030