VERMONT YANKEE NUCLEAR POWER CORPORATION

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REPLY TO:
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2.C.2.1
FVY81-166

November 19, 1981

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation
Mr. T. A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing

References:
(a) License No. DPR-28 (Docket No. 50-271).
(b) Vermont Yankee Proposed Change No. 98 (FVY 81-128), dated September 2, 1981.
(c) Vermont Yankee Proposed Change No. 98, Supplement 1 (FVY 81-160), dated November 13, 1981.
(d) Telecon, J. C. Voglewede (NRC) to S. P. Schultz, (VY), November 9, 1981.
(e) Letter, R. E. Engle (GE) to T. A. Ippolito (NRC), "Extension of Emergency Core Cooling System Performance Limits," May 6, 1981.
(f) Letter, R. E. Engle (GE) to T. A. Ippoloito (NRC), "Extension of Emergency Core Cooling System Performance Limits," May 28, 1981.
(g) Amendment No. 57, August 22, 1980.

Subject: Additional Information on the Extension of Emergency Core Cooling System Performance Limits for Vermont Yankee

Dear Sir:

Reference (c) proposed an extension of emergency core cooling system limits (MAPLHGR limits) to higher applicable burnup ranges for specific Vermont Yankee fuel types. As stated in Reference (c), the limits were calculated by General Electric using methodology approved by the staff. This letter responds to Reference (d) in which the staff requested additional information regarding the applicability of these limits for Vermont Yankee in consideration of the NRC's models for enhanced fission gas release at high burnups. The specific information requested was a verification that the evaluation and assumptions made by General Electric in a generic response to these concerns (References (e) and (f)) are appropriate and representative for Vermont Yankee.

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We have reviewed the evaluation and analysis assumptions of the generic response and have determined that they are appropriate and representative for the Vermont Yankee analysis. This evaluation applies to the limits proposed for each Vermont Yankee fuel type as presented in Reference (c). This evaluation also applies to the limits as approved for each Vermont Yankee fuel type as presented in Reference (g).

We trust this information is satisfactory; however, should you have any further questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

R. L. Smith

R. L. Smith
Licensing Engineer

RLS/am