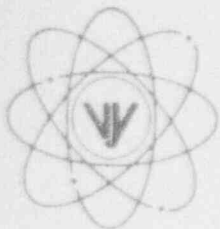


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPORT TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

March 26, 1993
BVY 93-29

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Reference: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, NRY 88-224, Generic Letter 88-16,
dated October 4, 1988
(c) Letter, USNRC to VYNPC, NRY 89-204, Amendment No. 116, dated
September 15, 1989

Subject: Proposed Technical Specification Change No. 169 to Update
Section 6.0, "Administrative Controls"

Dear Sir:

Pursuant to the Commission's rules and regulations as set forth in 10CFR50.90, Vermont Yankee Nuclear Power Corporation (VYNPC) hereby proposes the following change to Appendix A of the Vermont Yankee plant operating license (Reference (a)).

Proposed Change

Vermont Yankee proposes to change the Technical Specifications to update Section 6.0 in order to add and revise NRC-approved methodologies which will be used to generate the cycle-specific limits in the Vermont Yankee Core Operating Limits Report (COLR) for Cycle 17. The proposed section and changed pages are listed in Attachment 2. The revised pages are in Attachment 3.

Reason for Change

In accordance with the guidelines provided by the NRC in Reference (b), Section 6.0 of the Vermont Yankee Technical Specifications contains a list of methods approved by the NRC to generate the thermal limits specified in the Vermont Yankee Core Operating Limits Report. Additional NRC-approved methods, developed by Yankee Atomic Electric Company (YAEC), are being used in the Loss of Coolant Accident and transient analyses for Cycle 17. These methods are described in several references which are shown in Attachment 1. For administrative consistency, these methods are being added to the list.

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appearing in Section 6.7.A.4. General Electric (GE) has revised its "Standard Application for Reload Fuel" (GESTARII), NEDE-24011, which includes several NRC-approved methods being used for Cycle 17. In order to reduce the administrative burden of changing this reference every time GE updates this document, the reference includes the statement "the latest NRC-approved version will be listed in the COLR."

Basis for Change

In accordance with the guidance provided in Reference (b), Specification 6.7.A.4 lists the NRC-approved methods which can be used to generate the cycle-specific limits in the COLR (established by Reference (c)). Additional methods not currently in this list have been approved by the NRC. Vermont Yankee intends to use these approved methods to determine the LOCA and transient operating limits for Cycle 17 and future cycles. This proposed change simply adds these additional methods to Specification 6.7.A.4.

Safety Considerations

The proposed change does not constitute an unreviewed safety question as defined in 10CFR50.59(a)(2) because it is administrative in nature, serving only to update the Administrative Controls section of the Technical Specifications. All the methods referenced herein have been previously approved by the NRC. These changes have been reviewed by the Plant Operations Review Committee (PORC) and the Nuclear Safety Audit and Review Committee (NSARC).

Significant Hazards Consideration

10CFR50.92(c) states that a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not: (i) involve a significant increase in the probability or consequences of an accident previously evaluated; or (ii) create the possibility of a new or different kind of accident from any accident previously evaluated; or (iii) involve a significant reduction in a margin of safety. The Commission has also provided guidance concerning the application of these standards by providing certain examples (March 6, 1986, 51FR7751). An example of an amendment that is considered not likely to involve a significant hazards consideration is Example (i) which is a purely administrative change to the Technical Specifications. The discussion below addresses these standards and demonstrates that operating the facility in accordance with the proposed change involves no significant hazards considerations:

1. The proposed change will not involve any significant increase in the probability or consequences of an accident because the change only updates a table in the Technical Specifications to include

previously approved methods and, therefore, is administrative in nature. It also does not affect plant operation and will not weaken or degrade the facility.

2. The proposed change will not create the possibility of a new or different kind of accident because the change is administrative in nature and no physical alterations of any plant configuration, changes to setpoints, or operating parameters are proposed.
3. The proposed change will not involve a significant reduction in a margin of safety because the change involves an update to Section 6.0, "Administrative Controls," of the Technical Specifications and does not affect any operating practices, limits, or safety-related equipment, and, therefore, is administrative. The NRC-approved YAEK methodologies will be used to perform a LOCA analysis for Vermont Yankee in accordance with 10CFR50, Appendix K and to demonstrate compliance with the ECCS limits specified in 10CFR50.46.

The proposed change described above is administrative in nature because it simply updates Section 6.0, to include previously reviewed and approved methods which will be used to determine the core operating limits for Cycle 17 and future cycles. In accordance with Section 6.7.A.4 of the Technical Specifications, Vermont Yankee will, upon approval of this proposed change, issue a revised Core Operating Limits Report containing references to the subject approved methodologies.

Schedule for Change

We request that your review and approval of this proposed change be completed by June 1, 1993, in order to include this method in the generation of the Cycle 17 Core Operating Limits Report. This change will be incorporated into the Vermont Yankee Technical Specifications as soon as practicable following receipt of your approval.

We trust that the information above adequately supports our request; however, should you any questions in this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



D. A. Reid
Vice President - Operations

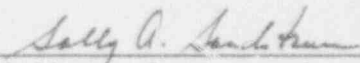
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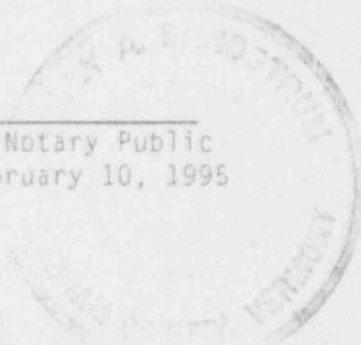
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March 26, 1993
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cc: USNRC Regional Administrator, Region I
USNRC Resident Inspector, VYNPS
USNRC Project Manager, VYNPS
Vermont Department of Public Service

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Donald A. Reid, who, being duly sworn, did state that he is Vice President - Operations, 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. Sandsrum Notary Public
My Commission Expires February 10, 1995



ATTACHMENT 1

NRC-Approved Methodology for Generating
Vermont Yankee Cycle-Specific Limits

- (a) Report, L. H. Steves, et. al, "HUXY: A Generalized Multirod Heatup Code with 10CFR50, Appendix K Heatup Option: User's Manual," XN-CC-33(A), Revision 1, dated November 14, 1975.
- (b) Report, "RELAP5YA, A Computer Program for Light-Water Reactor System Thermal-Hydraulic Analysis," YAE-1300P, October 1982.
- (c) Report, R. T. Fernandez and H. C. daSilva, Jr., "Vermont Yankee BWR Loss-of-Coolant Accident Licensing Analysis Method," YAE-1547, June 1986.
- (d) Letter from R. W. Capstick (VYNPC) to USNRC, "HUXY Computer Code Information for the Vermont Yankee BWR LOCA Licensing Analysis Method," FVY 87-63, dated June 4, 1987.
- (e) Letter from R. W. Capstick (VYNPC) to USNRC, "Request for Supplemental Safety Evaluation Report Supporting the Use of RELAP5YA for Vermont Yankee Nuclear Power Station," FVY 88-006, dated January 26, 1988.
- (f) Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Supplementary Information Regarding NRC LOCA Analysis Review Effort," BVY 89-91, dated October 6, 1989.
- (g) Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Supplementary Information Regarding NRC LOCA Analyses Review Effort," BVY 90-028, dated March 9, 1990.
- (h) Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Second Request for Additional Information on the Use of RELAP5YA," BVY 90-067, dated June 8, 1990.
- (i) Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Request for Additional Information on the Use of RELAP5YA," BVY 90-087, dated August 28, 1990.
- (j) Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Second Request for Additional Information on the Use of RELAP5YA," BVY 91-05, dated January 9, 1991.
- (k) Letter from L. A. Tremblay, Jr. (VYNPC) to USNRC, "Response to Third Request for Additional Information on the Use of RELAP5YA," BVY 91-41, dated April 19, 1991.

