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FVY-81-80
2.C.2.1

May 15, 1981

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

Attention: Office of Nuclear Reactor Regulation
Darrell G. Eisenhut, Director
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, D. G. Eisenhut to All Licensees of Operating Plants, dated October 31, 1980
(c) Letter, VYNPC to USNRC, WVY 80-170, dated December 15, 1980
(d) Letter, D. B. Waters to USNRC, dated March 3, 1981
(e) Letter, VYNPC to USNRC, FVY 81-56, dated April 3, 1981

Subject: Submittal of Information on NUREG-0737, Item II.K.3.16, "Reduction of Challenges and Failures of Relief Valves" and Item II.K.3.18, "ADS Actuation"

Dear Sir:

Vermont Yankee has completed its evaluation of information received from the BWR Owners's Group, Reference (d), and hereby presents our response to the subject NUREG items as requested in Reference (b).

Item II.K.3.16 "Reduction of Challenges and Failures of Relief Valves"

The basic objective of Item II.K.3.16 is to reduce the number of challenges to relief valves. The approach taken in Reference (d) is to reduce the incidence of stuck open relief valve events; to reduce causes of spurious blowdowns, and to reduce the probability of safety/relief valves sticking open when challenged. The experience base compiled by General Electric Company includes over 1,000 safety/relief valve years of operation. For Vermont Yankee, two candidate modifications will result in fewer isolation events, thereby decreasing potential challenges to safety/relief valves. One of these involves lowering the MSIV pressure isolation setpoint to 800 psig. The second involves increasing the high steam flow isolation from 120 to 140 percent of rated steam flow. We are evaluating these changes. If found acceptable, they will be submitted as a proposed change to Technical Specifications.

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Item II.K.3.18 " Modifications of Automatic Depressurization System Logic"

This NUREG-0737 item requires a feasibility and risk assessment study to be performed to determine if changes should be made to the Automatic Depressurization System (ADS) logic to optimize its operation.

As discussed above, the BWR Owners' Group has completed a study which includes discussion on several viable options. Four hardware modifications, along with retention of the current scheme, were considered. These five options were evaluated as to system performance, feasibility of implementation, cost of additional design and hardware and impact on plant operation.

Vermont Yankee has completed review of the subject study and has concluded at this time that hardware changes are not desirable and, in fact, are not required if the new procedures developed from the emergency procedure guidelines are implemented. In addition, if any of the proposed changes were to be implemented, they would change the design basis of this system and the probability of existing design basis accidents. Such a change would constitute an unreviewed safety question.

We trust the above supplied information is acceptable to you. If you have further concerns or questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

L. H. Heider
Vice President