The augmented inservice inspection requirements to be imposed on all nonconforming systems in accordance with Enclosure A represent an upgrading of the existing inspection program. These measures are deemed to be sufficient to maintain the necessary safety margins and to preclude endangerment of the public health and safety. Therefore, this change does not involve any unreviewed safety questions.

This submittal has been reviewed by the Vermont Yankee Nuclear Safety Audit and Review Committee.

Fee Determination:

This proposed change is being submitted in response to a written request from the USNRC to bring Vermont Yankee Technical Specifications in to compliance with NUREG-0313, Revision 1. Therefore, we deem no fee need be paid pursuant to 10 CFR 170.

Schedule of Change:

Enclosure A will be incorporated into Vermont Yankee Technical Specifications upon acceptance by the Commission. In addition, a revision to the Vermont Yankee Inservice Inspection Program detailing the augmented inservice inspection schedule for nonconforming systems will be available for Commission review within six months of your acceptance of Enclosure A.

We trust you will find this submittal satisfactory; however, should you desire additional information, please feel free to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

LH Heider

L. H. Heider
Vice President

COMMONWEALTH OF MASSACHUSETTS)
)ss
MIDDLESEX COUNTY)

Then personally appeared before me, L. H. Heider, who, being duly sworn, did state that he is a Vice President of Yankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing request 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.

Robert H Groce

Robert H. Groce Notary Public
My Commission Expires September 14, 1984

ROBERT H. GROCE
MASSACHUSETTS
NOTARY PUBLIC

E. Structural Integrity and Operability Testing

The structural integrity and the operability of the safety-related systems and the components shall be maintained at the level required by the original acceptance standards throughout the life of the plant.

E. Structural Integrity and Operability Testing

1. Inservice inspection of safety-related components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda is required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g) (6) (i).

2. Operability testing of safety-related pumps and valves shall be performed in accorance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a (g) (6) (i).

3. All Reactor Coolant Pressure boundary piping and components shall comply with the objectives of NUREG-0313, Rev. 1, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping, July 1980," to the extent that activities associated with such compliance shall remain consistent with established ALARA policies regarding personnel radiation exposure.

greater than the limit specified for unidentified leakage, the probability is small the imperfections or cracks associated with such leakage would grow rapidly. Leakage less than the limit specified can be detected within a few hours utilizing the available leakage detection systems. If the limit is exceeded and the origin cannot be determined in a reasonably short time the plant should be shut down to allow further investigation and corrective action.

The removal capacity from the drywell floor drain sump and the equipment drain sump is 50 gpm each. Removal of 50 gpm from either of these sumps can be accomplished with considerable margin.

D. Safety and Relief Valves

Parametric evaluations have shown that only three of the four relief valves are required to provide a pressure margin greater than the recommended 25 psi below the safety valve actuation settings as well as a MCPR 1.06 for the limiting overpressure transient below 98% power. Consequently, 95% power has been selected as a limiting power level for three valve operation. For the purposes of this limiting condition a relief valve that is unable to actuate within tolerance of its set pressure is considered to be as inoperable as a mechanically malfunctioning valve.

Experience in safety valve operation shows that a testing of 50% of the safety valves per refueling outage is adequate to detect failures or deterioration. The tolerance value is specified in Section III of the ASME Boiler and Pressure Vessel Code as $\pm$ 1% of design pressure. An analysis has been performed which shows that with all safety valves set 1% higher the reactor coolant pressure safety limit of 1375 psig is not exceeded.

E. Structural Integrity an Operability

A pre-service inspection of the components listed in Table 4.2-4 of the FSAR has been conducted after site erection to assure freedom from defects greater than code allowance; in addition, this serves as a reference base for further inspections. Prior to operation, the reactor primary system was free of gross defects. In addition, the facility has been designed such that gross defects should not occur throughout plant life. The Inservice Inspection Program will be in accordance with 10 CFR 50, Section 50.55 a (g) (6) (i) except where specific written relief has been granted by the NRC. This inspection provides further assurance that gross defects are not occurring. This inspection will also insure that safety-related components remain operable. In addition, an augmented Inservice Inspection Program which meets the objectives of NUREG-0313, Rev. 1 will be applied to Reactor Coolant Pressure Boundary piping and components that have exhibited an increased susceptibility to intergranular stress corrosion cracking. This program provides an inspection schedule which is slightly accelerated over that required by 10 CFR 50.55 a, and implementation will be subjected to personnel radiation exposure limits which will ensure that established ALARA policies are observed.