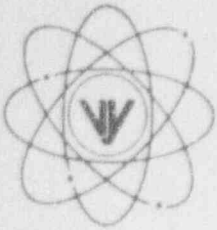


VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

REPLY TO
ENGINEERING OFFICE

July 14, 1993
BVY 93-068

580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

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

- References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to [All Licensees], NVE 88-09, dated February 1, 1988 (Generic Letter 88-01)
(c) Letter, VYNPC to USNRC, FVY 88-62, dated July 27, 1988
(d) Letter, USNRC to [All Licensees], NVE 92-21, dated February 4, 1992 (Supplement 1 to Generic Letter 88-01)
(e) Letter, USNRC to VYNPC, NVE 92-89, dated May 22, 1992

Subject: Proposed Change # 171 to Technical Specifications - Additions in Response to Generic Letter 88-01

Dear Sir:

Pursuant to the provisions of 10CFR 50.90 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following changes to Appendix A of the Facility Operating License [Reference (a)].

Proposed Change

Vermont Yankee proposes to modify Sections 3.6 and 4.6 of the Vermont Yankee Technical Specifications and its accompanying Bases section to comply with Generic Letter 88-01, "NRC Position on Intergranular Stress Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping" [Reference (b)]. Specifically, Vermont Yankee proposes to modify Technical Specifications as follows:

1. Page 108, Sections 3.6.C.1 and 4.6.C.1, to limit the increase in reactor coolant leakage into the primary containment from unidentified sources to not more than 2 gpm within any 24 period.
2. Page 122, Section 3.6.C.1 Bases, to include a reference to Generic Letter 88-01 as the basis for the 2 gpm increase in unidentified leakage Limiting Condition for Operation.
3. Page 108a, Section 4.6.E.1, to include compliance with Generic Letter 88-01 when performing the inservice inspection program for piping identified in the generic letter.

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4. Page 123, Section 4.6.E.1 Bases, to include a reference to Generic Letter 88-01.

Reason for Change

In Reference (b), the NRC issued Generic Letter 88-01 which transmitted to licensees various staff positions relative to the occurrence of IGSCC in BWR stainless steel piping and requested licensees to respond to these staff positions. This submittal constitutes Vermont Yankee's proposed changes to the Technical Specifications as requested by NRC in Reference (e).

Basis for Change

The basis for this change is contained in Generic Letter 88-01 [Reference (b)], as supplemented by Reference (d) and as directed by NRC in Reference (e).

Safety Evaluation

This proposed change involves the addition of a Limiting Condition for Operation to the Vermont Yankee Technical Specifications which directs plant operators to initiate an orderly shutdown and to bring the reactor to a cold shutdown condition within 24 hours as a result of detecting an increase in reactor coolant leakage into primary containment from unidentified sources in excess of 2 gpm within a 24 hour period. This is a more restrictive and conservative limitation than currently exists in the Vermont Yankee Technical Specifications. However, a similar requirement currently exists as an administrative control in plant procedure OP 4152. Therefore, relocating the requirement from a plant administrative document into the Technical Specifications does not change the requirement itself, resulting in no affect on plant safety.

This proposed change also includes the staff position on schedule, methods and personnel, and sample expansion for inservice inspection of piping identified in the generic letter. The additional inspections will not adversely affect plant safety.

This proposed change has been reviewed by the Vermont Yankee Plant Operations Review Committee (PORC) and the Vermont Yankee Nuclear Safety and Audit Review Committee (NSARC).

Significant Hazards Consideration

The standards used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulations (10CFR 50.92) which state that the operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The discussion below addresses each of these three criteria and demonstrates that the proposed amendment involves no significant hazards considerations.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment would add a more conservative requirement into the plant Technical Specifications, in addition to those that presently exist. Hence, approval of this change will have no effect on any previously evaluated accident scenario.
2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. No physical changes are being made to the plant and no new operating techniques or procedures are being proposed. The proposed amendment would add an additional Limiting Condition for Operation and an increased Surveillance Requirement to plant Technical Specifications. Hence, approval of this change will not create the possibility of a new or different kind of accident.
3. The proposed amendment will not involve a significant reduction in a margin of safety. The proposed change adds more restrictive requirements into the Technical Specifications. Hence, approval of this change would not reduce the 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 (ii) which is an additional limitation, restriction, or control not presently included in the Technical Specifications. This proposed amendment provides for an additional Limiting Condition of Operation and an increased Surveillance Requirement in the plant Technical

Specifications. Therefore, based on the above, it is determined this change does not constitute a significant hazards consideration as defined in 10CFR 50.92(c).

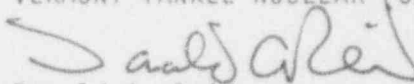
Schedule of Change

The revised pages will be incorporated in the Technical Specifications as soon as practicable following receipt of NRC approval. Please also be informed that Vermont Yankee intends to revise plant procedure OP 4152 to eliminate the words "averaged over" a 24 hour period, as requested by NRC in Reference (e), and will continue administrative controls to satisfy the 2 gpm leakage detection requirements of Generic Letter 88-01 until NRC approval of this proposed change request is received.

We trust that this submittal is acceptable; however, should you have any questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Donald A. Reid
Vice President - Operations

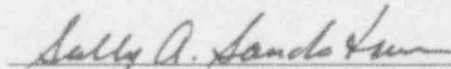
c: USNRC Region I Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS
VT Department of Public Service

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. Sandstrum Notary Public
My Commission Expires February 10, 1995

