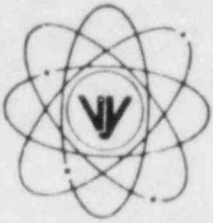


VERMONT YANKEE NUCLEAR POWER CORPORATION

PROPOSED CHANGE NO. 114



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

February 8, 1983

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FVY 83-8

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

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

Attention: Office of Nuclear Reactor Regulation

References: (a) License No. DPR-28 (Docket No. 50-271)

Subject: Expedited Technical Specification Change: Primary Containment
Isolation Valves

Dear Sir:

PROPOSED CHANGE

The change involves a revision of page 135 of the Vermont Yankee Technical Specifications. The revision to page 135 allows the use of a manual valve not currently listed in the Technical Specifications to effect primary containment isolation.

REASON FOR CHANGE

On February 3, 1983, V16-20-20 and V-16-20-22B failed to close. The valves were closed after several actuations of the remote manual switches. Based on past experience with these valves, the failure is assumed to be due to a collection of ferrous metal particles collected on the magnet used to provide valve position indication. On February 4, 1983, a Y-strainer with a magnetic insert was installed upstream of the valves to prevent the ferrous metal particles from reaching these valves.

The existing installation consists of the above mentioned two solenoid operated valves in series with a manual globe valve. The globe valve is installed to provide a boundary for leak testing V16-20-20 and V16-20-22B in accordance with 10CFR50 Appendix J. This change will allow the manual valve to be used as a containment isolation valve for a period not to exceed 72 hours during which V16-20-20 and V16-20-22B can be disassembled, cleaned, reassembled, leak tested in accordance with Appendix J, and returned to service. During the 1983 Refuel Outage, scheduled to begin March 5, 1983, the solenoid valves would be replaced with a valve of a different design. The installation of the Y-strainer will assure the operability of the valves during the interim period.

This change is required prior to February 15, 1983 in order to prevent a plant shutdown. The subject valves must be opened in order to re-establish d/p in containment after conducting vacuum breaker surveillance testing. A plant shutdown would invoke an additional cycle on the reactor vessel as well as expenditures of approximately \$750,000 per day for replacement power during the shutdown.

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SAFETY CONSIDERATIONS

V16-20-20 and V16-20-22B are closed at the present time thereby satisfying the safety aspect of primary containment. In order to return these valves to service without a plant shutdown, manual globe valve V-16-20-22D would be used to maintain primary containment integrity during the repair process. Although V16-20-22D is not presently listed in Vermont Yankee Technical Specifications, we believe its use as an isolation valve is acceptable for the following reasons:

1. The manual valve is properly designed for temperature and pressure conditions.
2. The manual valve would be used only once for a period not to exceed 72 hours during the repair of V-16-20-20 and V16-22-22B. The normal repair time for these valves is 8 to 12 hours.
3. The manual valve has been subjected to a leak test in accordance with 10CFR50 Appendix J. The last successful test was performed January 9, 1983.

10CFR50 Appendix J states that a Type C test shall be performed by local pressurization. The pressure shall be applied in the same direction as that when the valve would be required to perform its safety function, unless it can be determined that the results from the tests for a pressure applied in a different direction will provide equivalent or more conservative results.

V16-20-22D is the boundary valve for leak testing the two solenoid valves. When applying the test pressure, V16-20-22D is tested in a direction opposite that which the valve would be required to perform its safety function. In order to verify that the test is equivalent regardless of the direction that the pressure is applied, an identical valve was tested on February 4, 1983, in both directions. After repeating this test several times, it was concluded that there was no discernable difference in leakage rate when applying pressure under the seat or over the seat of this one inch manual globe valve. This test was witnessed by the Resident NRC Inspector. The maximum leakage in either direction was 0.014 lbm/hr.

Based on the above, the probability of previously evaluated accidents is not increased by this change. The possibility of a different type of accident is not created nor are the margins of safety as defined in the basis of the Technical Specification reduced by this proposed change. Therefore, this change does not constitute an unreviewed safety question as defined in 10CFR50.59(a)(2).

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

FEE DETERMINATION

This proposed change requires an approval that involve a single safety issue and is deemed not to involve a significant hazards consideration. For these reasons, Vermont Yankee Nuclear Power Corporation proposes this as a Class III Amendment. A payment of \$4,000.00 will be forwarded.

This proposed change will be incorporated into Vermont Yankee Technical Specification as soon as possible following NRC approval.

Very truly yours,

Jr Heider

LHH/dd

Then personally appeared before me, L. H. Heider, who, being duly sworn, did state that he is a Vice President of Vermont Yankee Nuclear Power Corporation, 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.

J. B. Sinclair
J. B. Sinclair

J. B. Sinclair
My Commission Expires

Notary Public
June 1, 1984

