VERMONT YANKEE
NUCLEAR POWER CORPORATION

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

2.C.2.1
FVY 83-38

REPLY TO:
ENGINEERING OFFICE
1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

May 17, 1983

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

Attention: Office of Nuclear Reactor Regulation
Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, Generic Letter 83-02, dated January 10, 1983

Subject: NUREG-0737 Technical Specifications

Dear Sir:

In Reference (b), you requested that we review our facility Technical Specifications to determine their consistency with the guidance criteria provided in Enclosure 1 of Reference (b). The purpose of this letter is to provide you with the attached summary results of that effort.

We trust this information is satisfactory; however, should you have further questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

J. B. Sinclair

J. B. Sinclair
Licensing Engineer

JBS/dd

Attachment

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NUREG-0737 TECHNICAL SPECIFICATIONS

(1) STA Training (I.A.1.1.3)

References: (a) Letter, VYNPC to USNRC, Proposed Change No. 91, dated September 12, 1980
(b) Letter, USNRC to VYNPC, Amendment No. 63 to Vermont Yankee Technical Specifications, dated March 2, 1981
(c) Letter, VYNPC to USNRC, Proposed Change No. 112, dated February 28, 1983
(d) Letter, USNRC to VYNPC, Amendment No. 79 to Vermont Yankee Technical Specifications, dated May 2, 1983

Two proposed changes to Technical Specifications related to this item were submitted to the NRC via References (a) and (c). Both were subsequently approved by the NRC by References (b) and (d), respectively.

(2) Limit Overtime (I.A.1.3)

References: (a) Letter, VYNPC to USNRC, FVY 82-109, dated October 12, 1982
(b) Letter, USNRC to VYNPC, dated December 15, 1981

As we informed you in Reference (a), we have established controls necessary to ensure that, to the extent practicable, personnel are not assigned to shift duties while in a fatigued condition. Administrative procedures presently in force implement a management policy which meets the intent of the June 15, 1982 Commission's Policy Statement in this regard. These procedures have been reviewed by the NRC and found acceptable via Reference (b). Consequently, we do not believe a revision to Technical Specifications is appropriate since suitable controls have already been imposed and these controls are subject to inspection and enforcement by Region I.

(3) Dedicated Hydrogen Penetrations (II.E.4.1)

References: (a) Letter, VYNPC to USNRC, FVY 82-81, Exemption Request, dated July 6, 1982
(b) Letter, T. J. Dente to D. G. Eisenhut, dated June 24, 1982

Reference (a) requested an exemption from the requirements of 10CFR50.44(c)(3)(ii), which requires Mark I containments that rely on purge/repressurization as the primary means of hydrogen control, be provided with the capability to install an external recombiner following a postulated LOCA. The basis for our request stems from the findings of

a study entitled, "Generation and Mitigation of Combustible Gas Mixtures in Inerted BWR Mark I Containments - NEDO 22155," conducted by General Electric Company on behalf of the BWR Owners Group. This study was submitted to the NRC via Reference (b).

Pending the results of the NRC's review of this study and subsequent disposition of our Exemption Request, we will review the need for a change to Technical Specifications.

(4) Containment Pressure Setpoint (II.E.4.2.5)

References: (a) Letter, VYNPC to USNRC, WVY 80-170, dated December 15, 1980
(b) Letter, USNRC to VYNPC, dated December 8, 1981

As discussed in Reference (a), we provided the NRC with justification for not changing the containment pressure setpoint. In Reference (b) the NRC provided an SER which concluded that the existing setpoint meets the criteria of NUREG-0737. Therefore, no change to facility Technical Specifications is necessary.

(5) Containment Purge Valves (II.E.4.2.6)

References: (a) Letter, VYNPC to USNRC, WVY 80-170, dated December 15, 1980
(b) Letter, USNRC to VYNPC, NVY 82-201, dated December 9, 1982

As discussed in Reference (a), we stated that all purge and vent valves greater than three inches are capable of operating under the most severe design basis accident condition. In Reference (b) the NRC concluded that we met the Staff Interim Position and that no further action for this item is warranted.

(6) Radiation Signal on Purge Valves (II.E.4.2.7)

Reference: (a) Letter, VYNPC to USNRC, WVY 80-170, dated December 15, 1980
(b) Letter, USNRC to VYNPC, NVY 82-201, dated December 9, 1982

As discussed in our response to Item II.E.4.2 of Reference (a), containment purge and vent valves (listed in Table 4.7.2.a of Vermont Yankee Technical Specifications) automatically closed as a result of three (3) isolation signals, one of them being high radiation in the Reactor Building ventilation exhaust plenum or refueling floor. In Reference (b) the NRC provided an SER for this item. Since existing facility Technical Specifications address this item, we believe no further action is warranted.

(7) Reporting SV and RV Failures and Challenges (II.K.3.3)

Reference: (a) Letter, VYNPC to USNRC, WVY 80-170, dated December 15, 1980

As discussed in Reference (a), we agreed to consider model Technical Specifications for this item. In addition, we committed, and have revised our procedures accordingly, to report challenges to our relief valves as part of our 50.59 Annual Operating Report.

We have considered the model Technical Specifications and have determined that our present administrative provisions for reporting relief valve challenges as part of our Annual Operating Report adequately addresses this item.

(8) RCIC Restart and RCIC Suction (II.K.3.13 and 22)

References: (a) Letter, VYNPC to USNRC, FVY 83-31, dated April 5, 1983
(b) Letter, VYNPC to USNRC, FVY 82-101, dated September 9, 1982

References (a) and (b) document the scope of our design modifications for Items II.K.3.13 and II.K.3.22, respectively.

We believe that existing facility Technical Specifications [which require periodic surveillance of the RCIC System] and plant surveillance and operating procedures [which have been revised to reflect the design modifications discussed in References (a) and (b)] adequately address system operability.

(9) Isolation of HPCI and RCIC Modification (II.K.3.15)

References: (a) Letter, VYNPC to USNRC, Proposed Change No. 95, FVY 81-144, dated October 5, 1981
(b) Letter, VYNPC to USNRC, FVY 81-162, dated November 18, 1981
(c) Letter, USNRC to VYNPC, Amendment No. 69 to Vermont Yankee Technical Specifications, dated November 27, 1981

References (a) and (b) document our submittal for a proposed change to Technical Specifications to reflect modifications to HPCI and RCIC Systems to prevent inadvertent isolation due to starting steam flow transients. These Technical Specification changes were subsequently reviewed and approved by the NRC via Reference (c). No further action for this item is warranted.

(10) Interlock on Recirculation Pump Loop (II.K.3.19)

This item is not applicable to Vermont Yankee.

(11) Common Reference Level (II.K.3.27)

References: (a) Letter, VYNPC to USNRC, Proposed Change No. 93, dated December 1, 1980
(b) Letter, USNRC to VYNPC, Amendment No. 68 to Vermont Yankee Technical Specifications, dated November 16, 1981

Reference (a) documents our submittal for a proposed change to Technical Specifications to reflect provisions for a common reference for vessel level instrumentation. These Technical Specification changes were subsequently reviewed and approved by the NRC via Reference (b). No further action for this item is warranted.

(12) Manual Depressurization (II.K.3.45)

No action for this item is necessary.