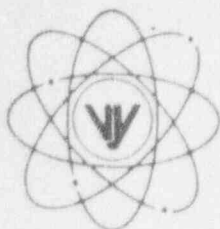


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

August 3, 1994
BVY 94-77

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

References: a. License No. DPR-28 (Docket No. 50-271)
b. Letter, VYNPC to USNRC, BVY 90-044, dated April 8, 1990.
c. Letter, USNRC to VYNPC, NVY 90-161, dated August 23, 1990

Subject: Amendment No. 125 to Facility Operating License regarding DC Power System

In Reference (b) Vermont Yankee submitted a proposed change to the plant Technical Specifications with regard to the DC Power System at Vermont Yankee Nuclear Power Station. This proposed change was approved by the NRC as License Amendment No. 125 via Reference (c).

During a recent review of the surveillance requirements contained in the Vermont Yankee Technical Specifications, we have detected an apparent discrepancy between our submittal of Reference (b) and wording contained in the NRC Safety Evaluation Report (SER) enclosed with Reference (c) regarding the use of the term "pilot cell" as it pertains to batteries in the DC power system.

In the "Reason for Change" section of the Vermont Yankee proposed change submittal [Reference (b)], Paragraph 3 reads as follows:

"The present surveillance requirement to measure the temperature of cells adjacent to the pilot cells has been replaced with the requirement to measure the temperature of the pilot cell itself. The temperature of every sixth cell will be measured quarterly for the purpose of specific gravity correction."

Paragraph 8 of the same section reads as follows:

"The electrolyte temperature and level and cell voltage are important parameters to be monitored during quarterly battery surveillance and is recommended by both the battery manufacturers and IEEE. IEEE recommends the temperature of every sixth cell be measured and recorded."

The revised Technical Specification pages contained a requirement to measure and log the specific gravity, temperature, level and voltage of the pilot cell weekly and a requirement to measure and log the voltage, temperature, level and specific gravity of each cell every three months.

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In the Safety Evaluation Report which accompanied Reference (c), Paragraph 2 reads as follows:

"The proposed SR 4.10.A.2.a adds a requirement to measure and record pilot cell (every sixth cell) electrolyte level weekly. It also requires measurement of the temperature of the pilot cell itself weekly. The proposed SR 4.10.A.2.b adds a requirement to measure and record electrolyte level and temperature for all the cells during quarterly battery surveillance."

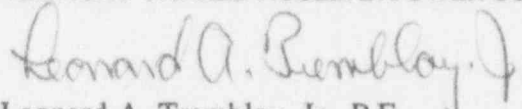
The wording contained in the SER implies that Vermont Yankee treats every sixth cell as a pilot cell. The proposed change letter [Reference (b)] discusses using a measurement from every sixth cell for quarterly temperature averaging, but does not state that every sixth cell is a pilot cell. Vermont Yankee, following common industry practice, has always designated one cell per battery bank as the pilot cell. Performing surveillance on every sixth cell on a weekly basis would mandate surveillance testing which would extend well beyond common industry practice and would represent a significant, unnecessary burden on Vermont Yankee.

We request that the Staff review References (b) and (c) and revise and/or amend as appropriate the SER enclosed with Reference (c) to clarify the definition of a pilot cell at Vermont Yankee.

Should you have any questions with regard to this request, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Leonard A. Tremblay, Jr., P.E.
Senior Licensing Engineer

cc: USNRC Region I Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS