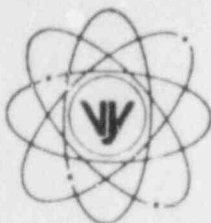


# VERMONT YANKEE NUCLEAR POWER CORPORATION

Proposed Change No. 117



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

REPLY TO  
ENGINEERING OFFICE

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

February 7, 1984

FVY 84-8

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

Attention: Office of Nuclear Reactor Regulation  
Mr. D. G. Eisenhut, Director  
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) Amendment No. 64, Calvert Cliffs-Unit 1  
(c) Letter, USNRC to VYNPC, Inspection Report 50-271/83-13,  
dated May 26, 1983  
(d) Letter, USNRC to All Power Reactor Licensees,  
dated November 20, 1980  
(e) Letter, VYNPC to USNRC, dated April 7, 1981

Subject: Request for License Amendment - Safety-Related Shock Suppressors

Dear Sir:

Pursuant to Section 50.59 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following modification to Appendix A of the Operating License:

Proposed Change:

Replace Pages 110a, 110b, 110c, 125, and 125a of the Vermont Yankee Technical Specifications with the attached revised Pages 110a, 110b, 110c, 110d, 110e, 110f, and 125. These pages have been revised to more closely match limiting conditions for operation and surveillance requirements contained in the Commission's Standard Technical Specifications.

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Reason for Change:

In 1980, the NRC transmitted revised guidelines for snubbers to licensees and requested that licensees submit amendment application incorporating the applicable portions of the model Technical Specification. At that time, we concluded that there was insufficient justification for implementing the additional requirements and formally took issue [Reference (e)] with the request.

On May 3, 1983, an NRC inspector, Mr. J. T. Wiggans, in company with the Senior Resident Inspector, Mr. W. Raymond, met with Vermont Yankee management personnel.

At that meeting, the NRC inspector discussed the bases for the new specifications. Further, the inspector discussed those areas in which the current Vermont Yankee Technical Specifications differ from Standard Technical Specifications (STS). These areas included:

1. The operability requirements for snubbers in those systems required to be operable during cold shutdown and refueling modes
2. The required actions when inoperable snubbers are identified
3. The visual inspection acceptance criterion associated with snubbers whose fluid reservoirs are found drained
4. The STS guidance regarding functional testing sample selection
5. The need to retest, at the next functional testing period, those snubbers which have failed a functional test
6. The need for an engineering evaluation to be performed to determine the effects of inoperable snubbers on the performance of safety-related systems
7. The need for a snubber service life monitoring program

At that time, it was agreed that we would review our position and program.

Based on our review, we have concluded that certain changes should be made to enhance our existing program. These changes are reflected in the attached revised pages.

Standard Technical Specifications, the existing Technical Specifications, and a licensing amendment [Reference (b)], previously found acceptable by the NRC, were reviewed and form the bases for this proposal.

Each of the seven differences listed above has been carefully looked at and, with the exception of Item #7, we are proposing changes which we feel meet the intent of the Commissions' Standard Technical Specification. With regard to Item #7 (the need for a service life monitoring program), we remain convinced that our preventive maintenance program, as described in Reference (e), is sufficient to monitor snubber performance. Further, we question the bases for requiring this program in the snubber section of the Technical Specifications, when it is not required in other more important areas of the Technical Specifications.

Safety Considerations:

The changes proposed in this submittal are intended to bring the Vermont Yankee Technical Specifications into conformance with NRC guidance. The changes enhance the current specification by clarifying: 1) operability requirements, 2) inspection criteria, 3) retest requirements, and 4) requiring engineering evaluations should degraded conditions be found.

As discussed above, these changes are consistent with those previously approved by the NRC for another facility.

We have concluded that the probability of previously evaluated accidents would not be 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 Specifications, reduced by this change. Therefore, we have determined that this change does not constitute an unreviewed safety questions, as defined in 10CFR50.59(a)(2).

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

Significant Hazards Consideration:

The NRC has provided guidance concerning the application of standards for conclusions regarding "Significant Hazards Consideration" [48FR14870]. The examples of actions involving no significant hazards consideration include: a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications (for example, a more stringent surveillance requirement).

As discussed above, this proposed change enhances the current Technical Specifications by clarifying snubber operability requirements, inspection criteria, retest requirements, and the need for engineering evaluation should degraded conditions be found. Since the proposed specifications are more restrictive than those in the present Technical Specifications, we have concluded that this change does not constitute a significant hazards consideration, as defined in 10CFR50.92(c).

Fee Determination:

This proposed change requires an approval that involves 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 is enclosed.

Schedule of Change:

The change described above will be incorporated into the Vermont Yankee Technical Specifications as soon as reasonable upon receipt of your approval; however, no sooner than startup from the 1984 refueling outage (presently expected in mid-August 1984).

We trust that the information provided above adequately supports our request; however, should you have any questions in this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

L.H. Heider

L. H. Heider  
Vice President

JBS / smh

## Attachments

cc: Vermont Department of Public Services  
120 State Street  
Montpelier, Vermont 05602  
Attention: Mr. Richard Saudek, Chairman

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 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.



J. B. Sinclair  
J. B. Sinclair  
My Commission Expires

Notary Public  
June 1, 1984