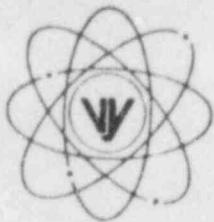


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

February 22, 1984

REPLY TO:
ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-5100

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

FVY 84-12

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, NVY 83-257, Generic Letter 83-36,
dated November 1, 1983

Subject: NUREG-0737 Technical Specifications (Generic Letter 83-36)

Dear Sir:

By Reference (b), you requested that we review the need for Technical Specifications for certain NUREG-0737 items. In addition, for those items where we identify deviations or absence of a specification in our Technical Specifications, as compared to the guidance included as Enclosure 1 to Reference (b), we were requested to submit an application for a license amendment.

The purpose of this letter is to provide you with the results our review of the need for the subject Technical Specifications. These results are provided as Enclosure 1 to this letter. It should be noted that although we concur with the need for Technical Specifications for certain of the subject NUREG-0737 items, a schedule for submitting applications for licensing amendments cannot be finalized at this time. In order to integrate this effort with other ongoing NRC mandated activities at our facility, we propose to negotiate a reasonable schedule for the development and submittal of these applications with our Project Manager.

We trust that the enclosed information adequately addresses your requests; however, should you have any questions in this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

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PDR ADDCK 05000271
P PDR

J. B. Sinclair
J. B. Sinclair
Licensing Engineer

JBS/smh

Enclosure

A046
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Vermont Yankee Response to NRC
Staff Guidance on Technical Specifications
for NUREG-0737 Items Scheduled After
December 31, 1981

(1) Reactor Coolant System (RCS) Vents (II.B.1)

Reference: (1) Letter, USNRC to VYNPC, NVY 82-160, Safety Evaluation Report, dated October 13, 1982.

Reference (1) concluded that existing systems at Vermont Yankee are sufficient to vent noncondensable gases from the RCS and meet the requirements of this item. In addition, Reference (1) states that, "Because the venting is inherent and places no new demands on the existing systems or procedures, we conclude that the current procedures and Technical Specifications are acceptable for RCS venting."

(2) Post-Accident Sampling (II.B.3)

The Technical Specification guidance provided by the staff states that an administrative program should be established, implemented, and maintained to ensure that the plant has the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions. This program should include:

- a) Training of personnel,
- b) Procedures for sampling and analysis, and
- c) Provisions for maintenance of sampling and analysis equipment.

The staff guidance goes on to state that, "If the licensee elects to reference this program in the administrative controls sections of the Technical Specifications and include a detailed description of the program in the plant operations manuals," that this approach is acceptable.

We concur with the staff's guidelines insofar as the details of our post-accident sampling program need not be incorporated into the Technical Specifications. However, we respectfully disagree with the need to reference this program in the administrative controls section of Technical Specifications. Because our sampling program (training, sampling and analysis procedures, and equipment maintenance) is subject to Region I inspection and enforcement, we cannot perceive of any value in referencing the existence of this program in our Technical Specifications. Further, such a reference does nothing to enhance the safe operation of the plant which we believe is the fundamental purpose of Technical Specifications.

(3) Noble Gas Effluent Monitors (II.F.1.1)

Reference: (1) Letter, VYNPC to USNRC, FVY 81-178, Proposed Change No. 99 to Facility Operating License No. DPR-28, dated December 29, 1981

By Reference (1), we submitted an application for a license amendment for the NUREG-0737 item which is currently being reviewed by the NRC. We believe our amendment application meets the intent of the staff's guidance criteria.

(4) Sampling and Analysis of Plant Effluents (II.F.1.2)

We take issue with the desirability of Technical Specifications for this item. Our basis for not submitting an application for a licensing amendment is discussed in Item (2) above.

(5) Containment High-Range Radiation Monitor (II.F.1.3)

(6) Containment Pressure Monitor (II.F.1.4)

(7) Containment Water Level Monitor (II.F.1.5)

(8) Containment Hydrogen Monitor (II.F.1.6)

(9) Control Room Habitability Requirements (II.D.3.4)

We agree that an application for a licensing amendment, which meets the intent of the staff's guidance criteria, should be submitted for Items 5 through 9. As stated in the cover letter, the schedule for developing and submitting the necessary applications for license amendments will be discussed with our Project Manager.