

VERMONT YANKEE NUCLEAR POWER CORPORATION

Proposed Change No. 120



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REPLY TO:
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June 5, 1984

FVY 84-58

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

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

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to Georgia Power Co., dated November 17, 1983
(c) NUREG-0123, Boiling Water Reactor Standardized Technical Specifications

Subject: Technical Specification Clarifications

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 2 and 130 of the Vermont Yankee Technical Specifications with the attached revised pages. These pages have been changed to provide additional clarification for certain limiting conditions for operation and definitions.

As currently interpreted, these sections have resulted in unnecessary delays and/or significant constraints on operating flexibility with relatively no benefit in terms of protection of the public health and safety.

Reason and Bases for Change

The current definition for "operable" requires normal and emergency power systems to be available in order to classify a system as operable. We understand that the definition of "operable" in the latest draft of NUREG-0123, and the approved Technical Specification for Susquehanna Unit 1, more appropriately specify "electrical power" as a requirement for operability. This change was made by the NRC to eliminate the conflict between the "old" definition and Specification 3.0.5 contained in Standard

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Technical Specifications and to assure consistency with the applicability of Criterion 17 of 10CFR50, Appendix A. The revision proposed endorses this change.

The changes requested will allow refueling operations to proceed while having one diesel generator out of service for maintenance purposes. We believe that this approach is consistent with industry practice, plant design criteria, and allowed for those plants with Standardized Technical Specifications (STS) 3.0.5, or its equivalent.

Pages 140 of the Vermont Yankee Technical Specifications, which discusses the bases for the Standby Gas Treatment System (SBGTS), and the Secondary Containment System, clearly indicates that "reactor or refueling" operation can continue with one SBGTS train out of service. This conflicts with page 130 of our Technical Specifications which indicates that both diesel generators are required to declare the SBGTS operable.

Technical Specifications are written with respect to systems under a specific system heading. To avoid confusion, a Technical Specification should be self-supporting, as much as possible, and not be subject to cross-interpretation. The existing Specification goes beyond that by requiring us to address the inoperability of emergency power not only within the limiting conditions of operation and action statements applicable to the diesel generators; but effectively to every system and/or subsystem that the diesels support. When considered from this point of view, the multiple interpretations across systems are confusing, difficult to implement, and overly conservative.

Safety Considerations

The clarification of the definition of operable and changes to the operability requirements of the Standby Gas Treatment System are intended to minimize confusion and over-conservatism caused by cross-interpretation of Technical Specification sections. We believe that a strict interpretation of the existing specification confuses concepts of redundancy and independency, and is in conflict with guidance provided by the NRC. As long as off-site and on-site power supplies are independent and subsystems redundant, then the protection offered by the SBGTS meets the design basis assumed for our plant. The consequences of power systems being out of service have already been justified in the specifications by providing restrictions on continued operation commensurate with the level of degradation.

Based on the above, we believe that the proposed change to the definition of operable does not reduce the level of safety assumed in the licensing basis for our plant, but merely eliminates over-conservatism associated with our current definition.

This proposed change has been reviewed by the Vermont Yankee Nuclear Safety and Review Committee.

Significant Hazards Consideration

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48FR14870). The examples involving no significant hazards consideration include: (iv) "A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: For example, a change resulting from the application of a small refinement of a previously used calculational model or design method".

The change described above reduces a margin of safety by allowing us to declare the SBGTS operable with one diesel generator; however, this change is clearly within the applicable criteria and is therefore encompassed by example (iv).

Based on the above, we have concluded that the proposed change does not constitute a significant hazards consideration, as defined in 10CFR50.92(c).

Fee Determination

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

Schedule for Change

This change will be incorporated into the Technical Specifications as soon as reasonable upon receipt of your approval. Your prompt attention to this request would be appreciated in that these changes will have a direct bearing on our planning for the 1984 refueling outage which is scheduled to commence on June 16, 1984.

The reasons for requesting your prompt attention are as follows: Our initial 1984 refuel outage schedule of activities was developed in consideration of our present Technical Specification that secondary containment is operable only if the Standby Gas Treatment System and both diesel generators are available. As a result, our refuel outage schedule is extended for seven to eight days to accommodate the requirement to have both diesels in service in order to declare the SBGTS operable. Approval of this change will allow certain refuel activities to proceed concurrent with having one diesel out of service, thus shortening the refuel outage critical path activities by approximately one week. Specifically, our current outage schedule indicates that refuel activities requiring secondary containment could commence on July 4, 1984, but based on the current Technical Specification, must be delayed until July 12, 1984 when Diesel Generator B is restored to an operable condition. The estimated cost per day for replacement power is nominally \$600,000.00.

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We trust that the information provided is sufficient to allow for your review and for the subsequent issuance of a license amendment; however, should you have any questions, please contact us.

VERMONT YANKEE NUCLEAR POWER CORPORATION

Robert H. Moore