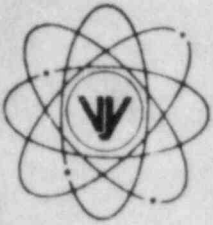


# VERMONT YANKEE NUCLEAR POWER CORPORATION

Proposed Change No. 124



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

REPLY TO:  
ENGINEERING OFFICE

1671 WORCESTER ROAD  
FRAMINGHAM, MASSACHUSETTS 01701  
TELEPHONE 617-472-8100

December 14, 1984

FVY 84-146

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

Attention: Office of Nuclear Reactor Regulation  
Mr. H. R. Denton, Director

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  
(c) Letter, VYNPC to USNRC, FVY 84-12, dated February 22, 1984

Subject: NUREG-0737 Technical Specifications

Dear Sir:

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

## PROPOSED CHANGE

Replace Pages 34a, 49, 49a, 60, 66, and 67 of the Vermont Yankee Technical Specifications with the attached revised Pages 34a, 49, 49a, 60, 66, and 67 and add Pages 49b, 49c, 60a, and 61b. These changes incorporate the addition of post-accident instrumentation and associated limiting conditions for operation and surveillance requirements, as well as several minor corrective updates which reflect currently installed, upgraded instrumentation.

## REASON FOR CHANGE

By Generic Letter 83-36 [Reference (b)], NRC provided guidance on Technical Specifications for NUREG-0737 items scheduled after December 31, 1981. Reference (b) also requested that all boiling water reactor licensees review their facility's Technical Specifications to determine if they were consistent with that guidance. For those items where deviations or absence of a specification was identified, NRC requested that an application for a license amendment be submitted.

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By letter, dated February 22, 1984 [Reference (c)], Vermont Yankee provided NRC with the results of our review concerning the need for Technical Specification modifications with respect to Generic Letter 83-36 guidance. Vermont Yankee's review determined that an application for license amendment to meet the intent of the staff's guidance criteria should be submitted for the following installed instrumentation: Containment High-Range Radiation Monitor, Containment Hydrogen Monitor, Containment Pressure Monitor, Containment Water Level Monitor, and Control Room Toxic Gas Monitor. Additional changes were made to reflect currently installed, upgraded instrumentation.

#### BASIS FOR CHANGE

Based on the requirements of NUREG-0737 discussed above, the following additional instrumentation was installed: (1) Containment High-Range Radiation Monitor, (2) Containment Hydrogen/Oxygen Monitor, (3) Containment Pressure Monitor, (4) Torus Water level (Wide Range) Monitor, and (5) Control Room Toxic Gas Monitor. In Reference (b), the NRC requested that we add the operability surveillance and calibration requirements for these instruments to the Technical Specifications. In Reference (c), we agreed to provide proposed modifications to Technical Specifications for these instruments. The proposed specifications provided to address Items (2), (3), (4), and the corrective updates are consistent with existing limiting conditions for operation and surveillance requirements. The proposed specifications to address Items (1) and (5), above, are appropriate due to the low probability of occurrence and/or the alternative means available to obtain the information.

#### SAFETY CONSIDERATIONS

The addition of redundant environmentally and seismically qualified instruments (instrumentation numbered 1 through 4 above) enhance the operators' ability to follow the course of an event. The addition of the Control Room Toxic Gas Monitor (Number 5 above) assures that Control Room operators will be adequately protected against the effects of an accidental release of toxic gases. The corrective updates are administrative in nature and are consistent with other Technical Specifications. The probability of accidents previously evaluated is not increased, 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 the proposed change. Thus, these proposed changes have been determined not to constitute an unreviewed safety question as defined by 10CFR50.59(a)(2).

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

#### SIGNIFICANT HAZARDS CONSIDERATION

The Commission has provided guidance for the application of the standards in 10CFR50.92 by providing certain examples (48FR14870) of actions likely to involve no significant hazards consideration. One of the examples (i) is a purely administrative change to the Technical Specifications for example, a

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change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. Another of the examples (ii) is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications.

The modifications to Technical Specifications in response to TMI Action Plan Items constitute additional limitations, restrictions, or controls not presently included in the Vermont Yankee Technical Specifications. Therefore, the proposed changes are similar to the Commission's example (ii), above, and are not considered to constitute a significant hazards consideration as defined in 10CFR50.92(c). The corrective updates to the proposed specifications are purely administrative changes similar to the Commission's example (i), above, and therefore are not considered a significant hazards consideration as defined in 10CFR50.92(c).

FEE DETERMINATION

In accordance with the provisions of 10CFR170.12 and application fee of \$150.00 is enclosed.

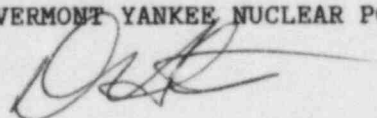
SCHEDULE OF CHANGE

This change to the Vermont Yankee Technical Specifications will be implemented as soon as practicable following receipt of your approval.

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

  
D. Hunter  
Vice President

RC/tja


Enclosure



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

Then personally appeared before me, D. Hunter, who, being duly sworn, did state that he is a Vice President and Manager of Operations 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.

  
Armand R. Soucy                      Notary Public  
My Commission Expires      August 29, 1991