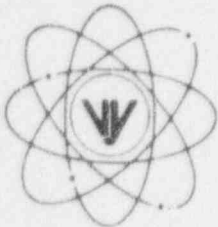


VERMONT YANKEE NUCLEAR POWER CORPORATION



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REPLY TO:
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August 22, 1996
BVY 96-99

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) NRC Generic Letter No. 83-36, NUREG-0737 Technical Specifications, November 1, 1983

Subject: Proposed Change No. 181, High Range Stack Monitor Action Statement

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following change to Appendix A of the facility Operating License [Reference (a)].

Proposed Change

This proposed change removes the existing action statement for the High Range Stack Noble Gas Monitor and replaces it with an action statement based on the guidance provided in Reference (b).

The change proposed is as follows:

- (1) Page 55, Section 3.2.G., Table 3.2.6, Note 7. Delete the existing note and replace with the following: "From and after the date that this parameter is unavailable by Control Room indication, within 72 hours insure that local sampling capability is available. If the Control Room indication is not restored within 7 days, prepare and submit a Special Report to the NRC within 14 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status."

Reason/Basis for Change

This Proposed Change will remove the action statement requiring reactor shutdown after 30 days of inoperability of the High Range Stack Gas Monitor and substitute an action statement consistent with the guidance provided in NRC Generic Letter 83-36. Enclosure 1 to Reference (b) provides the following guidance concerning Noble Gas Effluent Monitors (NUREG-0737 item II.F.1.1):

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Noble Gas Effluent monitors provide information, during and following an accident, which is considered helpful to the operator in assessing the plant condition. It is desired that these monitors be operable at all times during plant operation, but they are not required for safe shutdown of the plant. In case of failure of the monitor, appropriate actions should be taken to restore its operational capability in a reasonable period of time. Considering the importance of the availability of the equipment and possible delays involved in administrative controls, 7 days is considered to be the appropriate time period to restore the operability of the monitor. An alternate method for monitoring the effluent should be initiated as soon as practical, but no later than 72 hours after the identification of the failure of the monitor. If the monitor is not restored to operable condition within 7 days after the failure, a special report should be submitted to the NRC within 14 days following the event, outlining the cause of the inoperability, actions taken and the planned schedule for restoring the system to operable status.

The High Range Stack Noble Gas Monitor consists of a single instrument with no redundant counterpart. This change will minimize the potential for an unnecessary shutdown in the event the instrument is damaged by lightning, or otherwise out of service and cannot be immediately repaired.

Safety Consideration

The High Range Stack Monitor provides an estimate of gross stack activity that has exceeded the upper limit of the normal range instrumentation. The High Range Monitor reading serves as input to dose projection systems for initial estimation of off-site conditions. The monitor reading would be used prior to the acquisition of stack isotopic sample data which would provide a more accurate indication of stack activity.

Due to the passive function of the instruments and the ability to monitor this parameter utilizing alternate methods, it is not appropriate to impose stringent requirements on the operation of the unit. Further, the proposed required action to restore, provide an alternate method of monitoring, and report any long term inoperability will minimize the potential for plant transients that can occur during required shutdowns. This monitor is identified in the Vermont Yankee Reg. Guide 1.97 submittal as Category 2, Type E. This monitor provides post accident information for use in determining the magnitude of the release of radioactive materials and for monitoring such release. However, the High Range Stack Monitor does not have any safety function associated with the prevention or automatic mitigation of design basis accidents, neither does it provide primary information needed to permit the control room operating personnel to take required manually controlled actions.

This Proposed Change has been reviewed by the Vermont Yankee Plant Operations Review Committee and Nuclear Safety Audit and Review Committee.

Significant Hazards Consideration

The Standards used to arrive at a determination that a request for amendment involves no significant hazards are included in the Commission's regulations (10CFR50.92) which states that the operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant

reduction in a margin of safety. In addition, the Commission has provided guidance in the practical application of these criteria in 51FR7751, dated March 6, 1986.

The discussion below addresses each of these criteria and demonstrates that the proposed amendment involves no significant hazards consideration.

- 1) The High Range Stack Monitor is a RG 1.97, Category 2, Type E instrument with no specified safety function associated with the prevention or automatic mitigation of design basis accidents, neither does it provide primary information needed to permit the control room operating personnel to take required manually controlled actions. The proposed change to the action statement associated with this monitor will not change the function of this monitor, and since the monitor is not assumed to initiate any accidents, nor function to mitigate any accidents, this change will not significantly increase the probability or consequences of any previously analyzed accident.
- 2) The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will still ensure effective methods are available to assess post accident conditions. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
- 3) The proposed change to the action statement associated with this monitor will not change the function of this monitor, and since the monitor is not assumed to function for the prevention or mitigation of any previously evaluated accidents, this change will not significantly reduce a margin of safety.

Based on the above discussion, we have determined that this change does not constitute a significant hazard consideration as defined in 10CFR50.92(c).

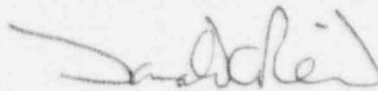
Schedule of Change

The proposed change will be incorporated into Vermont Yankee Technical Specifications 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 question in this matter, please do not hesitate to contact us.

Sincerely,

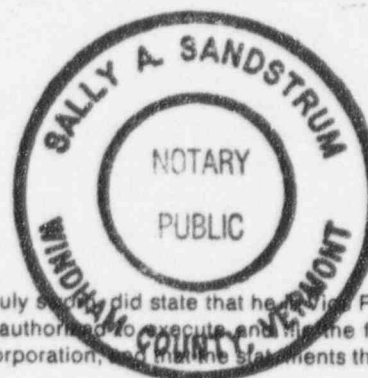
Vermont Yankee Nuclear Power Corporation



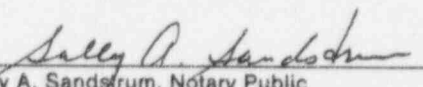
Donald A. Reid
Vice President, Operations

cc: USNRC Region 1 Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS

STATE OF VERMONT)
)ss
WINDHAM COUNTY)



Then personally appeared before me, Donald A. Reid, who, being duly sworn, did state that he is Vice President, 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.


Sally A. Sandstrum, Notary Public
My Commission expires February 10, 1999