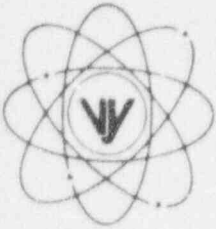


# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO  
ENGINEERING OFFICE

580 MAIN STREET  
BOLTON, MA 01740

(508) 779-6711

October 11, 1996  
BVY 96-120

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) Letter, VYNPC to USNRC, Licensee Event Report 96-13, BVY 96-68, dated May 23, 1996

**Subject: Proposed Change Number 188, Revised Recirculation Motor Generator Set Fire Protection Foam System Capacity**

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 operating license [Reference (a)].

**Proposed Change:**

This proposed change revises the existing requirements regarding the amount of foam concentrate required to support the operability of the Recirculation Motor Generator (M. G.) Set Foam System as stated in Technical Specifications 3.13.G.1 and 3.13.G.2. In both instances, the required amount of foam concentrate is increased from 100 gallons to 150 gallons.

Specifically, the changes proposed are as follows:

- (1) Page 248, Specification 3.13.G.1. The parenthetical description of a "full tank" is revised from 100 gallons to 150 gallons.
- (2) Page 248, Specification 3.13.G.2. The amount of foam concentrate required to be available on site whenever the Recirculation M. G. set Foam Set is inoperable is revised from 100 gallons to 150 gallons.

**Reason/Basis For Change:**

Reference (b) reported, in part, that the Reactor Recirculation M. G. Set foam suppression system area of coverage per foam nozzle was found to exceed the manufacturer's recommended coverage. The system was administratively declared inoperable and compensatory measures were put in place. The stated corrective action for this problem was that the system would be modified as necessary to bring it to its required design configuration prior to startup from the 1996 refueling outage. To that end, a design change has been prepared to replace the existing equipment with a system capable of satisfying National Fire Protection Association (NFPA) discharge density requirements, thereby restoring the system to

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its originally approved design configuration. As part of this new system, a 150 gallon foam concentrate tank will be installed to provide the capacity required to meet the NFPA Standards. The intent of the current Technical Specification regarding foam concentrate inventory is to keep the existing tank full and to keep a 100% refill capacity on site at all times. This proposed change will ensure that intent continues to be met.

#### Safety Considerations:

This Proposed Change will only modify the Technical Specifications to reflect the actual inventory of foam concentrate required to support the operability of the Recirculation M. G. Set Foam System. The method of system operation and initiation remain unchanged from the originally approved design. The increase in inventory is required to assure that NFPA Code requirements for this system are met. This system is not considered an accident initiator; the Proposed Change does not change the radiological dose to the public in any way; and there are no plant safety functions impacted by this change such that the probability of a malfunction which could impact analyzed transients is increased. The new system design has been evaluated to ensure that the enhanced spray pattern and increased volume of spray does not impact any equipment not previously evaluated and does not create any threat of flooding to equipment. Therefore the possibility of a different type of malfunction of equipment than previously evaluated in the FSAR is not created.

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

#### Significant Hazards Considerations:

The standards used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulations, 10CFR50.92 which state 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 practical guidance in the practical application of these criteria in 51FR7751, dated March 6, 1986.

The discussion below addresses the proposed changes with respect to these three criteria and demonstrates that the proposed amendment involves a no-significant-hazards consideration:

1. The changes proposed herein affect only the amount of foam concentrate inventory required to support the operability of the Recirculation M. G. Set Foam System and therefore do not modify or add any initiating parameters that would significantly increase the probability or consequences of any previously analyzed accident.
2. These changes involve the upgrade of an existing system using standard fire protection components to provide the level of protection originally required. An evaluation has been completed to ensure that the enhanced spray pattern and increased volume of spray does not impact any equipment not previously evaluated and does not create any threat of flooding to equipment. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. These changes do not affect any equipment involved in potential initiating events or safety limits. Therefore, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

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

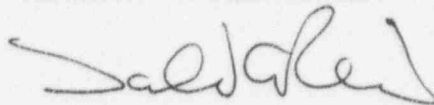
Schedule of Change:

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 adequately supports our request, however, should you have any questions regarding this matter, please do not hesitate to contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



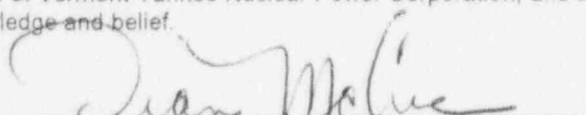
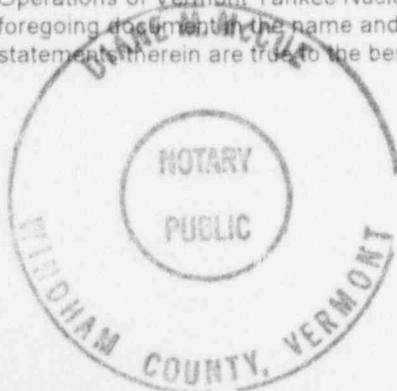
Donald A. Reid  
Vice-President, Operations

Enclosure A: Affected Technical Specification page  
Enclosure B: New Technical Specification page

c: USNRC Region I 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.



Diane S. McCue, Notary Public  
My Commission Expires 2/10/99