

# YANKEE ATOMIC ELECTRIC COMPANY

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2.C.15.1  
FYR 85-110  
PC #191

October 16, 1985

United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Office of Nuclear Reactor Regulation

References: (a) License No. DPR-3 (Docket No. 50-29)  
(b) YAEC Letter to USNRC, dated May 1, 1981  
(c) YAEC Letter to USNRC, dated April 17, 1984 (FYR 84-48)  
(d) YAEC Letter to USNRC, dated August 7, 1984 (FYR 84-84)  
(e) USNRC Letter to YAEC, dated September 14, 1983  
(f) USNRC Letter to YAEC, dated January 4, 1985 (NYR 85-08, Docket No. 50-29)

Subject: Change to Technical Specification (NUREG-0452), Revision 4,  
Degraded Grid Voltage Surveillance

Dear Sir:

Pursuant to Section 50.59 of the Commission's Rules and Regulations, Yankee Atomic Electric Company hereby requests the authorization to make the following change.

## PROPOSED CHANGE

Reference is made to the Yankee Plant Operating License No. DPR-3. We propose to modify Technical Specification Table 4.3-2, Engineered System Instrumentation Surveillance Requirements, to require a monthly functional test of the new second level degraded grid voltage protection for each of the three 480 V emergency buses. The amended Pages 3/4 3-15A and 3/4 3-16 are attached.

## REASON AND BASIS FOR CHANGE

The Technical Specification for testing of the new second level degraded grid voltage protection requires an 18-month testing interval in accordance with standard Westinghouse Technical Specifications (NUREG-0452), Revision 4. In References (e) and (f), the NRC requested that this be changed to a monthly testing interval to verify both function and accuracy of the second level degraded grid voltage and timing relays.

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We have evaluated our current Technical Specification surveillance requirements for the first level (loss of voltage) undervoltage protection. While these relays are not within the scope of our second level degraded grid modifications, it is our position that the current surveillance requirements are adequate for these relays, especially since these relays have demonstrated their high reliability over approximately 15 years. Therefore, based on this proven record, no change is warranted.

#### SAFETY CONSIDERATION

The significant hazards consideration is based on the guidance provided by example in 48FR14870. The change described herein is classified according to the following examples of actions involving no significant hazards:

1. A change that constitutes an additional limitation, restriction or control not presently included in the Technical Specification (i.e., a more stringent surveillance requirement).
2. A change to make a license conform to changes in the regulations where the license change results in very minor changes to facility operations clearly in keeping with the regulations.

This change in the second level testing interval will permit early detection of setpoint drifting on second level degraded grid voltage relays and associated time delay relays. The change represents an additional surveillance requirement not presently included in the Technical Specification and has been made at the request of NRC to conform with acceptance criteria.

Based on the consideration contained herein, it is concluded that there is reasonable assurance that operation of the Yankee plant, consistent with the proposed Technical Specification, will not endanger the health and safety of the public. This proposed change has been reviewed by the Nuclear Safety Audit and Review Committee.

#### FEE DETERMINATION

An application fee of \$150.00 is enclosed in accordance with 10CFR170.21.

#### SCHEDULE OF CHANGE

These changes to the Yankee Technical Specification will be implemented upon Commission approval. Notwithstanding, the Technical Specification will commence administratively with the startup of Cycle 18. A timely review and approval of this submittal consistent with our schedule for Cycle 18 is, therefore, requested.

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Very truly yours,

Oral

GP / gms

COMMONWEALTH OF MASSACHUSETTS)  
MIDDLESEX COUNTY ) ss )

Robert H. Groen

Robert H. Groce	Notary Public
My Commission Expires	August 29, 1991