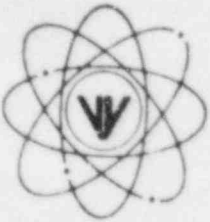


# VERMONT YANKEE NUCLEAR POWER CORPORATION

PROPOSED CHANGE NO. 130



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

REPLY TO:  
ENGINEERING OFFICE

1671 WORCESTER ROAD  
FRAMINGHAM, MASSACHUSETTS 01701  
TELEPHONE 617-872-8100

October 9, 1985  
FVY 85-95

United States Nuclear Regulatory Commission  
Washington, DC 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 84-200, dated August 28, 1984,  
"Order Confirming Licensee Commitments on Pipe Crack  
Related Issues"

Subject: Recirculation System Equalizer Piping Valves

Dear Sir:

Pursuant to Section 50.59 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following changes to Appendix A of the operating license.

## Proposed Change

Replace Pages 51, 109, 110 and 124 of the Vermont Yankee Technical Specifications with the enclosed revised Pages 51, 109, 110 and 124. This proposed change will revise the Vermont Yankee Technical Specifications to

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delete sections associated with the requirement that valves in the equalizer piping between the recirculation loops be closed during reactor operation.

#### Reason for Change

Vermont Yankee will be replacing the Recirculation System Piping during the present refueling outage which began on September 21, 1985. The replacement piping design includes the removal of the equalizer valves located between the recirculation loops. This design will thus achieve the Section 3.6.H.1 required isolation between the two loops by physically ensuring two independent loops without any connection. Therefore, the existing license condition, stated in Section 3.6.H.1 that the equalizer valves remain closed during reactor operation, is no longer required. Further, the Table 4.2.1 LPCI crosstie monitor functional test, calibration and instrument check requirements, and Section 4.6.F.2 surveillance language referencing equalizer valve closure, are no longer applicable.

#### Basis for Change

Because the required isolation between the recirculation loops will be ensured through the removal of the equalizer valves as a result of the Recirculation System Piping Replacement Program design, Technical Specification Sections 3.6.H.1, 4.6.F.2 and Table 4.2.1 requirements associated with equalizer valve closure are no longer required. Therefore, this change is proposed solely to delete requirements from the Technical Specifications which will become obsolete upon completion of the Recirculation System piping replacement during the next outage.

#### Safety Considerations

This proposed change does not present an unreviewed safety question as defined in 10CFR50.59, and removal of the equalizer valves does not impact existing safety analyses. The purpose of the equalizer valves was to interconnect the pump discharge lines so that one recirculation pump could provide flow to the discharge lines in the event that the other recirculation pump was inoperable. The requirement to keep the valves in the equalizer piping between the recirculation loops closed during reactor operation is based on the largest recirculation break area assumed in the ECCS evaluation. This break size is based on operation with a closed valve in the equalizer line between the two recirculation loops. Technical Specification 3.6.H.1 prohibits reactor operation unless the main equalizer valves in the equalizer lines are closed. Section 4.6.F.2 (jet pump surveillance) language incorporates the requirement to keep the equalizer valves closed when operating with one recirculation loop. The Table 4.2.1 LPCI crosstie monitor minimum test and calibration frequencies requires an instrument check once

each day. Thus, deletion of the above Technical Specification requirements associated with the equalizer valves, which will be removed as a result of the Recirculation System Piping Replacement Design, does not constitute an unreviewed safety question.

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

#### Significant Hazards Consideration

The NRC has provided guidance concerning the application of standards for conclusions regarding "Significant Hazards Consideration" [48FR14870]. The examples of actions involving no significant hazards consideration include, "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 is similar to the example cited above because Vermont Yankee is removing the equalizer valves and thus the need for Technical Specification restrictions as a result of our Recirculation System Piping Replacement Program, which is being performed in accordance with NRC Confirmatory Order, dated August 28, 1984 [Reference (b)]. This proposed change will result in a change to facility operations clearly in keeping with the regulations.

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

#### Fee Determination

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

#### Schedule of Change

We request that your review and approval of this proposed change be completed no later than March 1986, in order to insure that the change is incorporated in the Vermont Yankee Technical Specifications prior to restart from the 1985/1986 outage. This change will be incorporated into the Vermont Yankee Technical Specifications as soon as practicable following receipt of your approval.

October 9, 1985  
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Very truly yours,

Warren P. Murphy

WPM/min.t

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

Then personally appeared before me, Warren P. Murphy, 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.

Diane M. McCue  
Diane McCue Notary Public  
My Commission Expires

