VERMONT YANKEE NUCLEAR POWER CORPORATION

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B.3.2.1

REPLY TO:
ENGINEERING OFFICE
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WESTBORO, MASSACHUSETTS 01581
TELEPHONE 617-366-9011

November 12, 1980

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Office of Nuclear Reactor Regulation
Thomas A. Ippolito, Chief
Operating Reactors Branch No. 2
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) USNRC Letter to YAEC, R. W. Reid to R. H. Groce dated November 17, 1976
(c) VYNPC Letter (WVY 79-9) to USNRC, D. E. Vandenburgh to R. W. Reid dated January 30, 1979; Proposed Change No. 77
(d) VYNPC Letter (WVY 79-51) to USNRC, R. H. Groce to T. A. Ippolito dated April 30, 1979

Subject: Alternative Testing Requirements

Dear Sir:

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

PROPOSED CHANGE

The existing Technical Specifications contain minimum requirements for systems which allow certain limiting conditions for operation to exist at any one time and, if the system is not restored to meet the requirements within the time period specified, the reactor is required to be put in some other mode. Furthermore, the redundant subsystem that provides a duplicate function is required to be tested to demonstrate operability immediately and periodically thereafter during power operation. This situation has been pointed out by NRC staff members to be contrary to the NRC guidelines contained in Reference (b).

Changes to Technical Specification pages 86, 87, 103, 104 and 144 to implement the NRC staff guidelines for excluding the exercising (cycling) of certain valves during plant operation as described in Reference (b) are provided as an Attachment to this letter. It should be noted that all the changes are not made to the existing Technical Specification pages, but rather the revised pages previously transmitted via Reference (c).

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BASIS AND REASON FOR CHANGE:

This change was prompted by Reference (b) and by discussions with NRC staff personnel during the on-site working session held to review our proposed Inservice Inspection Program [Reference (d)]. The NRC guideline listed below provides the basis for the proposed changes.

> "Any valve which when exercised (cycled) could put the plant in an unsafe condition should not be tested. Below are some examples of the types of valves that should be specifically excluded from exercising (cycling) tests during plant operation.
>
> 1. All valves whose failure in a non-conservative position during the cycling test would cause a loss of system function should not be exercised. Valves in this category would typically include all non-redundant valves in lines such as a single discharge line from the refueling water storage tank, or accumulator discharge lines in PWR's and the HPCI turbine steam supply and the HPCI pump discharge in BWR's. Other valves may fall into this category under certain system configurations or plant operating modes. For example, when one train of a redundant system such as ECCS is inoperable, non-redundant valves in the remaining train should not be cycled since their failure would cause a loss of total system function."

The basis for each specific change is as follows:

Section 4.5.A.2 - the requirement to test the operable Core Spray Subsystem if the other is inoperable was deleted. Operability of the safety-related valves cannot be verified since stroking the valves requires that they be repositioned into a nonconservative position.

If any of the valves should fail in this position, the remaining Core Spray Subsystem would be inoperable since the flow would either be blocked or diverted from the reactor. Operability of the remaining Core Spray Pump cannot be verified since it requires that a single full flow test valve be opened. This valve lineup allows the water to be recirculated back to the torus. If this test valve failed in the open position, the remaining Core Spray Subsystem would be inoperable since the water would be diverted away from the reactor.

Section 4.5.A.4 - the requirement to test the operable LPCI Subsystem valves if the other LPCI Subsystem is inoperable was deleted. Operability of the safety-related valves cannot be verified since stroking the valve requires that they be repositioned into a nonconservation position. If any of the valves should fail in this position, the remaining LPCI Subsystem would be inoperable since the flow path to the reactor would be blocked.

Bases 4.5.A, 4.5.G, 4.7.A - the reference to the test frequency was deleted for consistency.

SAFETY CONSIDERATIONS:

The proposed changes to the Technical Specifications concerning Alternate Test Requirements in the event one subsystem is inoperable are consistent with the NRC Guidelines provided with Reference (b). These changes will insure that testing of certain pumps and valves will not place the plant in an unsafe condition through a loss of system function in the event a valve failed in its unconservative position.

The changes to the Bases are made to maintain consistency.

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

FEE DETERMINATION:

This proposed change requires an approval that involves a single safety issue and is deemed not to involve a significant hazards consideration. For these reasons, Vermont Yankee Nuclear Power Corporation proposes this change as a Class III Amendment. A payment of $4,000.00 is enclosed.

SCHEDULE OF CHANGE:

The revised pages will be incorporated into the Technical Specifications as soon as possible following receipt of NRC approval.

We trust this submittal is acceptable to you; however, should you have any questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

L. H. Heider
Vice President

COMMONWEALTH OF MASSACHUSETTS)
)ss
COUNTY OF WORCESTER)

Then personally appeared before me, L. H. Heider, who, being duly sworn, did state that he is a Vice President of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing request 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.

ROBERT H. GROCE
NOTARY PUBLIC
MASSACHUSETTS

Robert H. Groce Notary Public
My Commission Expires September 14, 1984