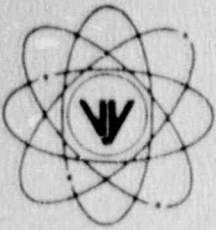


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

BVY 90-069

REPLY TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

June 11, 1990

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, NVY 88-224, Generic Letter
88-16, dated 10/4/88
c) Letter, USNRC to VYNPC, NVY 89-204, Amendment No. 116,
dated 9/15/89

Dear Sir:

Subject: Proposed Technical Specification Change No. 158 to
Update Section 6.0, "Administrative Controls"

Pursuant to the Commission's Rules and Regulations as set forth in 10CFR50.90, Vermont Yankee Nuclear Power Corporation hereby proposes the following change to Appendix A of the Vermont Yankee plant operating license [Reference a)].

Proposed Change

Vermont Yankee proposes to change the Technical Specifications to update Section 6.0 in order to add several NRC reviewed and approved methodologies being used to generate the cycle-specific limits in the Vermont Yankee Core Operating Limits Report (COLR) for Cycle 15. The proposed section and changed pages are listed in Attachment 2. The revised pages are in Attachment 3.

Reason for Change

In accordance with the guidelines provided by the NRC in Reference b), Section 6.0 of the Vermont Yankee Technical Specifications contains a list of methods approved by the NRC to generate the thermal limits specified in the Vermont Yankee Core Operating Limits Report. Additional NRC-approved methods, developed by Yankee Atomic Electric Company (YAEC) and included in Attachment 1, are being used to model the GE-9B fuel type for Cycle 15. For administrative consistency, these methods are being added to the list appearing in Section 6.7.A.4.

Basis for Change

In accordance with the guidance provided in Reference b), Specification 6.7.A.4 lists the NRC-approved methods which can be used to generate the cycle-specific limits in the COLR [established by Reference c)]. Additional methods

9006200352 900611
PDR ADDOCK 05000271
P FDC

Aool
111

U.S. Nuclear Regulatory Commission
June 11, 1990
Page 2

not currently in this list have been approved by the NRC. Vermont Yankee intends to use these approved methods to generate operating limits for Cycle 15 and future cycles. This proposed change simply adds these additional methods to Specification 6.7.A.4.

Safety Considerations

The proposed change does not constitute an unreviewed safety question as defined in 10CFR50.59(a)(2) because it is administrative in nature, serving only to update the Administrative Controls section of the Technical Specifications. All the methods referenced herein have been previously approved by the NRC. These changes have been reviewed by the Plant Operations Review Committee (PORC) and the Nuclear Safety Audit and Review Committee (NSARC).

Significant Hazards Consideration

10CFR50.92(c) states that a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not: i) involve a significant increase in the probability or consequences of an accident previously evaluated; or ii) create the possibility of a new or different kind of accident from any accident previously evaluated; or iii) involve a significant reduction in a margin of safety. The Commission has also provided guidance concerning the application of these standards by providing certain examples (March 6, 1986, 51FR7751). An example of an amendment that is considered not likely to involve a significant hazards consideration is Example (i) which is a purely administrative change to the Technical Specifications. The discussion below addresses these standards and demonstrates that operating the facility in accordance with the proposed change involves no significant hazards considerations:

1. The proposed change will not involve any significant increase in the probability or consequences of an accident because the change only updates a table in the Technical Specifications to include previously approved methods and, therefore, is administrative and does not affect plant operation, and will not weaken or degrade the facility.
2. The proposed change will not create the possibility of a new or different kind of accident because the change is administrative in nature and no physical alterations of any plant configuration, changes to setpoints, or operating parameters are proposed.
3. The proposed change will not involve a significant reduction in a margin of safety because the change involves an update to Section 6.0, Administrative Control, of the Technical Specifications and does not affect any operating practices, limits, or safety-related equipment and therefore is administrative. The margin of safety is unchanged because the plant is limited by the cycle-specific limits, established using NRC-approved methodology.

U.S. Nuclear Regulatory Commission
June 11, 1990
Page 3

The proposed change described above is administrative in nature because it simply updates Section 6.0 to include previously reviewed and approved methods used to determine the core operating limits for Cycle 15 and future cycles. In accordance with Section 6.7.A.4 of the Technical Specifications, Vermont Yankee will, upon approval of this proposed change, issue a revised Core Operating Limits Report containing references to the subject approved methodologies.

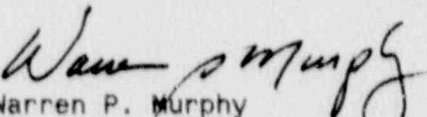
Schedule for Change

We request that your review and approval of this proposed change be completed by August 1, 1990, in order to include these methods in the generation of the Cycle 15 Core Operating Limits Report. This change will be incorporated into the Vermont Yankee Technical Specifications within 30 days following receipt of your approval.

We trust that the information above adequately supports our request; however, should you have any questions in this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

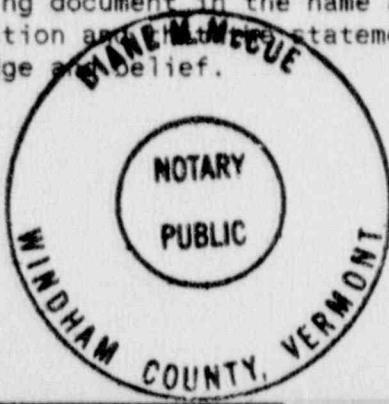

Warren P. Murphy
Senior Vice President, Operations

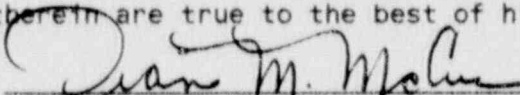
/dm

cc: USNRC Regional Administrator, Region I
USNRC Resident Inspector, VYNPS
USNRC Project Manager, VYNPS
Vermont Department of Public Service

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared me, Warren P. Murphy, who, being duly sworn, did state that he is Senior 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 his statements therein are true to the best of his knowledge and belief.




Diane M. McCue Notary Public
My Commission Expires February 10, 1991

ATTACHMENT 1

NRC-Approved Methodologies for Generating
Vermont Yankee Cycle-Specific Limits

- (a) Report, A. A. F. Ansari, "Methods for the Analysis of Boiling Water Reactors: Steady-State Core Flow Distribution Code (FIBWR)," YAEC 1234, December 1980.
- (b) Report, A. S. DiGiovine, et al., CASMO-3G Validation, YAEC-1363-A, April 1988
- (c) Report, A. S. DiGiovine, J. P. Gorski, and M. A. Tremblay, SIMULATE-3 Validation and Verification, YAEC-1659-A, September 1988
- (d) Report, R. A. Woehlke, et al., MICBURN-3/CASMO-3/TABLES-3/SIMULATE-3 Benchmarking of Vermont Yankee Cycles 9 through 13, YAEC-1683-A, March 1989
- (e) Report, J. T. Cronin, Method for Generation of One-Dimensional Kinetics Data for RETRAN-02, YAEC-1694-A, June 1989
- (f) Report, V. Chandola, M. P. LeFrancois, and J. D. Robichaud, Application of One-Dimensional Kinetics to Boiling Water Reactor Transient Analysis Methods, YAEC-1693-A, Revision 1, November 1989

ATTACHMENT 2

Vermont Yankee Proposed Technical Specification Change

<u>Section Changed</u>	<u>Page Deleted</u>	<u>Pages Inserted</u>
6.7.A.4	209a	209a and 209b