

As discussed above, there are no hardware changes associated with these Technical Specification revisions nor are there any changes in the method by which any safety-related plant system performs its safety function. The normal manner of plant operation is unaffected.

No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of these changes. There will be no adverse effect or challenges imposed on any safety-related system as a result of these changes. Therefore, the possibility of a new or different type of accident is not created.

(3) Involve a significant reduction in a margin of safety.

No response time changes are proposed in this amendment application; only the document where these limits are listed will be changed. There will be no effect on the manner in which safety limits or limiting safety system settings are determined nor will there be any effect on those plant systems necessary to assure the accomplishment of protection functions. There will be no impact on DNBR limits,  $F_O$ ,  $F\text{-}\Delta\text{-}H$ , LOCA PCT, peak local power density, or any other margin of safety.

Based upon the preceding information, it has been determined that the proposed changes to the Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed changes meet the requirements of 10CFR50.92(C) [sic] and do not involve a significant hazards consideration.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Local Public Document Room location:* Callaway County Public Library, 710 Court Street, Fulton, Missouri 65251.

*Attorney for licensee:* Gerald Charnoff, Esq., Shaw, Pittman, Potts & Trowbridge, 2300 N Street, N.W., Washington, DC 20037.

*NRC Project Director:* Leif J. Norrholm.

*Vermont Yankee Nuclear Power Corporation, Docket No. 50-271, Vermont Yankee Nuclear Power Station, Vermont*

*Date of amendment request:* December 8, 1994.

*Description of amendment request:* The proposed amendment would change Standby Gas Treatment Power Supply Requirements during refueling operations.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

SGTS [Standby Gas Treatment System] DURING REFUELING OPERATIONS (Specification 3.7.B.1, 3.7.B.3)

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The Standby Gas Treatment System (SGTS) is not the initiator of any accident. SGTS may be required to operate for a design basis loss of coolant accident or for a refueling accident in order to mitigate the consequences of said accident by providing a filtered exhaust path to minimize the potential release of radioactive material to the environs. The proposed amendment does not reduce or change the operational requirements for the SGTS for an accident. The proposed amendment now clearly defines the operability requirements during refueling conditions. The proposed amendment further requires the availability of a second auxiliary power supply in the event that an Emergency Diesel Generator (EDG) is out of service during refueling operations, not currently required. We conclude, therefore, that the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. The SGTS is not an accident initiator, therefore, the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in a margin of safety. The proposed amendment requires the availability of a second auxiliary power supply in the event that an EDG is out of service during refueling operations, not

currently required. Maintaining availability of a specific reliable auxiliary electrical power source as an alternative to an EDG in this mode provides assurance that SGTS can, if required, be operated without placing undue constraints on EDG availability and represents an enhancement that increases a margin of safety. We conclude, therefore, that the proposed amendment does not involve a significant reduction in a margin of safety.

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

LABORATORY CARBON SAMPLE ANALYSIS (Specification 3.7.B.2.b)

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The Standby Gas Treatment System (SGTS) is not the initiator of any accident. SGTS may be required to operate for a design basis loss of coolant accident or for a refueling accident in order to mitigate the consequences of said accident by providing a filtered exhaust path to minimize the potential release of radioactive material to the environs. The proposed amendment does not reduce or change the operational requirements for the SGTS for an accident. The proposed amendment now clearly defines the operability requirements during the interval between sample removal and completion of laboratory analysis.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. The SGTS is not an accident initiator, therefore, the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in a margin of safety. The proposed change does not reduce the requirements or acceptance criteria for sampling, testing or analysis. The proposed change only incorporates into the specification an existing clarification which addresses the determination of operability during the time between sample removal and completion of laboratory analysis. The change provides an explicit time limit consistent with current regulatory criteria for completion of analyses.

Based on the above discussion, we have determined that this change does not constitute a significant hazards