

May 19, 2000

Mr. Samuel L. Newton  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
185 Old Ferry Road  
Brattleboro, VT 05301

SUBJECT: SAFETY EVALUATION OF THE REQUEST FOR RELIEF FROM THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE SECTION XI REQUIREMENTS FOR THE CONTAINMENT INSERVICE INSPECTION PROGRAM, VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. MA8658)

Dear Mr. Newton:

By letter dated April 12, 2000, you submitted four relief requests (E-1 through E-4) concerning the containment examination requirements for the Vermont Yankee Nuclear Power Station Containment Inservice Inspection (ISI) Program. You requested approval for the use of alternative inspection and/or testing measures by August 31, 2000, to support preparation for scheduled ISI activities during the 2001 refueling outage. We have reviewed your submittal and, based on the information provided, we conclude that compliance with the ASME Code requirements would result in a hardship without a compensating increase in the level of quality and safety. Therefore, the proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii) for the first interval of the IWE Containment Inservice Inspection Program.

Our detailed evaluation and conclusions are documented in the enclosed safety evaluation.

Sincerely,

*/RA/*

James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE THIRD 10-YEAR INSERVICE INSPECTION

PROGRAM RELIEF REQUESTS

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

## 1.0 INTRODUCTION

In the Federal Register dated August 8, 1996 (61 FR 41303), the Nuclear Regulatory Commission (NRC) incorporated by reference the 1992 Edition with 1992 Addenda of Subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code (Code) pursuant to 10 CFR 50.55a. Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of Class CC (concrete containment), and Class MC (metallic containment) of light-water cooled nuclear power plants. The effective date of the incorporations was September 9, 1996, and it requires the licensees to incorporate the new requirements into their ISI plans and to complete the first containment inspection by September 9, 2001. However, a licensee may propose alternatives to or submit a request for relief from the requirements of the regulation pursuant to Section 50.55a(a)(3) or (g)(5) of Title 10 of the Code of Federal Regulations (10 CFR), respectively.

By letter dated April 12, 2000, Vermont Yankee Nuclear Power Corporation, the licensee, proposed several alternatives to the requirements of Subsections IWE and IWL of Section XI of the ASME Code for its Vermont Yankee Nuclear Power Station (Vermont Yankee). The NRC's findings with respect to authorizing the alternatives or denying the proposed requests are discussed in this evaluation.

## 2.0 EVALUATION

### 2.1 Relief Request No. E-1 - Containment Inspection Seals & Gaskets

#### 2.1.1 Code Requirements

The ASME Code, 1992 Edition, 1992 Addenda, IWE-2500, Table IWE-2500-1, Category E-D, requires seals and gaskets on airlocks, hatches, and other devices to be visually examined, VT-3, once each interval to ensure containment leak-tight integrity.

### 2.1.2 Specific Relief Requested

Relief is requested from performing the Code-required visual examination, VT-3, on the containment seals and gaskets of Class MC pressure-retaining components, Examination Category E-D, Item Numbers E5.10 and E5.20 of IWE-2500, Table IWE-2500-1, ASME Section XI, 1992 Edition, 1992 Addenda. This relief is requested for the first inspection interval for the IWE Containment Inspection Program.

### 2.1.3 Licensee's Basis for Relief

The licensee provided the following information as a basis for the requested relief:

10CFR50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. Seals and gaskets receive a leak-rate test as described in 10CFR50 Appendix J; the purpose is to measure leakage of containment or penetrations whose design incorporates resilient seals, gaskets, sealant compounds, and electrical penetrations with epoxy seals. Although not required by the Code, practical considerations for examination of seals and gaskets require the joints, which are proven adequate through Appendix J leak-rate testing, to be disassembled. The Vermont Yankee electrical penetrations have a double seal, one at each end of the penetration. The insulated electrical conductors pass through the header plates at both ends of the penetrations. The conductors are sealed in cast epoxy with most of the epoxy on the inner side of the header plates. Weld rings are provided at both ends of each penetration. The work effort to disassemble and inspect the electrical penetrations at Vermont Yankee would be destructive to the sealed penetration. The work required for the containment hatches (Personnel Access Hatch, Equipment Access Hatch and CRD Access Hatch) would involve a pre-maintenance Appendix J test, disassembly of the joint, removal and examination of the seals and gaskets, re-assembly of the joint, and a post-maintenance Appendix J test of the penetration. This imposes the risk that equipment could be damaged. The 1992 Edition, 1993 Addenda, of Section XI recognizes that disassembly of joints to perform these examinations is not warranted. Note 1 in Examination Category E-D was modified in the 1995 Edition of Section XI to state that sealed or gasketed connections need not be disassembled solely for performance of examinations. However, without disassembly, most of the surface of the seals and gaskets would be inaccessible.

For those penetrations that are routinely disassembled, a Type B leak-rate test is required upon final assembly and prior to start-up. Leak-rate testing is also performed periodically on penetrations that are not routinely disassembled, as required by the ASME Code and Appendix J. Since the periodic Appendix J leak-rate testing will by itself assure the leak-tight integrity of the tested primary containment penetration, the performance of the visual examination would not increase the level of safety or quality.

Seals and gaskets are not part of the containment pressure boundary under current Code rules [NE-1220(b)]. When the airlocks and hatches containing these materials are tested in accordance with 10CFR50, Appendix J, degradation of the seal or gasket material would be revealed by an increase in the leakage rate. Corrective measures would be applied and the component re-tested. Repair or replacement of seals and

gaskets is not subject to Code (1992 Edition, 1992 Addenda) rules in accordance with Paragraph IWA-4111(b)(5) of ASME Section XI.

The visual examination of seals and gaskets in accordance with IWE-2500, Table IWE-2500-1 is a burden without any compensating increase in the level of safety or quality. This requirement is not included in the 1997 Addenda of ASME Section XI.

Relief is requested in accordance with 10CFR50.55a(a)(3)(ii). Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Testing the seals and gaskets in accordance with 10CFR50, Appendix J will provide adequate assurance of the leak-tight integrity of the seals and gaskets.

#### 2.1.4 Alternative Examinations

The leak-tightness of seals and gaskets will be tested in accordance with 10 CFR Part 50, Appendix J. No additional alternatives to the visual examination, VT-3, of the seals and gaskets were proposed.

#### 2.1.5 Staff Evaluation of Relief Request No. E-1

Although the staff agrees that the ASME Code rules for repair and replacement do not apply to seals and gaskets, the staff does not fully agree with the licensee's statement that penetration seals and gaskets are not part of the containment pressure boundary. However, the staff finds that the alternative examination of the containment penetration seals and gaskets proposed by the licensee would verify the leak-tight integrity of the seals and gaskets during the testing required by 10 CFR Part 50, Appendix J.

The staff finds that because the seals and gaskets associated with these penetrations are not accessible for examination when the penetration is assembled, containment penetrations seals and gaskets must be disassembled and reassembled for the purpose of performing the VT-3 visual examination. These activities (disassembly of the joint, removal and examination of the seals and gaskets, reassembly of the joint, retermination of the cables if necessary, post-maintenance testing of the cables, and a post-maintenance Appendix J test of the penetration) associated with a VT-3 visual examination would introduce the possibility of component damage that would not otherwise occur. The periodic test of penetrations in accordance with 10 CFR Part 50, Appendix J will detect local leaks at containment peak accident pressure and measure leakage across the leakage-limiting boundary of containment penetrations whose design incorporates resilient seals, gaskets, sealant compounds, and electrical penetrations. If unacceptable leakage is identified during the test, corrective measures would be taken.

Also, the staff realizes that the 1992 Edition, including the 1993 Addenda of the ASME Code, Section XI has recognized that disassembly of joints for the sole purpose of performance of the visual examination is unwarranted. Requiring the licensee to disassemble components for the sole purpose of inspecting seals and gaskets would place a significant hardship on the licensee without a compensating increase in the level of quality and safety.

On the basis discussed above, the staff concludes that the alternative proposed by the licensee will provide reasonable assurance of the leak-tight integrity of the containment penetration seals

and gaskets during the testing required by 10 CFR Part 50, Appendix J. Therefore, the request for relief is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specific requirements of the Code would result in hardship without a compensating increase in the level of quality and safety.

## 2.2 Relief Request No. E-2 - Containment Inspection Successive Examinations After Repair

### 2.2.1 Code Requirements

Paragraphs IWE-2420(b) and IWE-2420(c) of the 1992 Edition, 1992 Addenda of ASME Section XI requires that when component examination results require evaluation of flaws, evaluation of areas of degradation, or repairs in accordance with Article IWE-3000, and the component is found to be acceptable for continued service, the areas containing such flaws, degradation, or repairs shall be reexamined during the next inspection period listed in the schedule of the inspection program of Paragraph IWE-2411 or Paragraph IWE-2412, in accordance with Table IWE-2500-1, Examination Category E-C.

### 2.2.2 Specific Relief Requested

Relief is requested from the requirement of Paragraphs IWE-2420(b) and IWE-2420(c) to perform successive examination of repairs. This is requested for all Class MC, Paragraphs IWE-2420(b) and IWE-2420(c) successive examination requirements for components found acceptable for continued service following repair. This relief is requested for the first inspection interval for the IWE Containment Inspection Program.

### 2.2.3 Licensee's Basis for Relief

The licensee provided the following information as a basis for the requested relief:

10CFR50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. The purpose of a repair is to restore the component to an acceptable condition for continued service in accordance with the acceptance standards of Article IWE-3000. Paragraph IWA-4150 requires the owner to conduct an evaluation of the suitability of the repair including consideration of the cause of failure.

If the repair has restored the component to an acceptable condition, successive examinations are not warranted. If the repair was not suitable, then the repair does not meet code requirements and the component is not acceptable for continued service. Paragraphs IWB-2420(b), IWC-2420(b), and IWD-2420(b) do not require a repair to be subjected to successive examination requirements. Furthermore, if the repaired area is subject to accelerated degradation, it would still require augmented examination in accordance with Table IWE-2500-1, Examination Category E-C. The successive examination of repairs in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) constitutes a burden without a compensating increase in quality or safety. Furthermore, repair is not included in Paragraphs IWE-2420(b) and IWE-2420(c) in the 1997 Addenda of the Section XI Code.

Relief is requested in accordance with 10CFR50.55a(a)(3)(ii). Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

#### 2.2.4 Alternate Examinations

Successive examinations in accordance with paragraphs IWE-2420(b) and IWE-2420(c) are not required for repairs made in accordance with Article IWA-4000.

#### 2.2.5 Staff Evaluation of Relief Request No. E-2

In lieu of meeting ASME Section XI, Subarticles IWE-2420(b) and (c) that require successive examinations of repaired areas in accordance with Table IWE-2500-1, the licensee proposes to use the process and acceptance examinations and evaluations required by the Code for repairs.

The staff finds that when repairs are complete, IWA-4150 requires licensees to evaluate the suitability of the repair. When a repair is required because of the failure of an item, the evaluation shall consider the cause of failure to ensure that the repair is suitable. Considering that the failure mechanism is identified and corrected as required and the repair receives preservice examinations, as required, the proposed alternative will provide reasonable assurance of structural integrity. In addition, IWB-2420(b), IWC-2420(b), and IWD-2420(b) do not require the successive inspection of repairs. Therefore, the licensee's proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specific Code requirements would result in hardship without a compensating increase in the level of quality and safety.

### 2.3 Relief Request No. E-3 - Containment Inspection Bolt Torque or Tension Testing

#### 2.3.1 Code Requirements

ASME Section XI, 1992 Edition with the 1992 Addenda, Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item E8.20 requires bolt torque or tension testing of bolted connections that have not been disassembled and reassembled during the inspection interval.

#### 2.3.2 Specific Relief is Requested

Relief is requested from performing the bolt torque or tension test in accordance with Table IWE-2500-1, "Examination Categories," Examination Category E-G, "Pressure Retaining Bolting," Item 8.20. Bolt torque or tension testing is not required on bolted connections that have not been disassembled and reassembled during the inspection interval. This relief is requested for the first inspection interval for the IWE Containment Inspection Program.

### 2.3.3 Licensee's Basis for Relief

The licensee provided the following information as a basis for the requested relief:

10CFR50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. Bolt torque or tension testing is required on bolted connections that have not been disassembled and reassembled during the inspection interval. Determination of the torque or tension value would require that the bolting be un-torqued and then re-torqued or re-tensioned. Performance of the periodic Appendix J leak-rate testing by itself proves that the bolt torque or tension remains adequate to provide a leakage rate that is within acceptable limits. The torque or tension value of bolting only becomes an issue if the leakage rate is excessive. Once a bolt is torqued or tensioned, it is not subject to dynamic loading that could cause it to experience significant change. Verification of torque or tension values on bolted joints that are proven acceptable through Appendix J testing and visual inspection is adequate to demonstrate that the design function is met. Torque or tension testing is not required on any other ASME Section XI, Class 1, 2, or 3 bolted connections or their supports as part of the inservice inspection program.

Relief is requested in accordance with 10CFR50.55a(a)(3)(ii). Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

### 2.3.4 Alternate Examinations

The licensee stated that the following examinations and tests required by Subsection IWE ensure the structural integrity and the leak-tightness of Class MC pressure-retaining bolting, and, therefore, no additional alternative examinations are proposed.

1. Exposed surfaces of bolted connections shall be visually examined in accordance with requirements of Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item No. E8.10;
2. Bolted connections shall meet the pressure test requirements of Table IWE-2500-1, Examination Category E-P, All Pressure Retaining Components, Item E9.40; and
3. A general visual examination of the entire containment once each inspection period shall be conducted in accordance with 10 CFR 50.55a(b)(2)(x)(E).

### 2.3.5 Staff Evaluation of Relief Request No. E-3

The ASME Code, Section XI, 1992 Edition with the 1992 Addenda, Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item E8.20 requires bolt torque or tension testing on bolted connections that have not been disassembled and reassembled during the inspection interval. This examination is used to aid in the determination that a leak-tight seal exists and that the pressure integrity of the subject bolted connections is maintained.

Periodic testing per 10 CFR Part 50, Appendix J, verifies that the bolt torque or tension remains adequate to limit any leakage to acceptable values.

The staff finds that compliance with ASME Code requirements will cause a hardship or an unusual difficulty because untorquing and subsequent re-torquing bolted connections which are verified to have acceptable leakage through 10 CFR Part 50, Appendix J testing does not provide an increase in the level of quality and safety. The staff also finds that the alternative approach proposed by the licensee will provide reasonable assurance of the containment leak-tight integrity. On this basis, the staff concludes that the alternative proposed by the licensee is authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

## 2.4 Relief Request No. E-4 - Containment Inspection NDE Personnel Qualifications

### 2.4.1 Code Requirements:

Subarticle IWA-2300 requires qualification of nondestructive examination (NDE) personnel to CP-189, as amended by the ASME Code Section XI.

### 2.4.2 Specific Relief is Requested

Relief is requested from the provisions of Subarticle IWA-2300, "Qualification of Nondestructive Examination Personnel." This requires NDE personnel to be qualified and certified using a written practice in accordance with CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel, as amended by the requirements of this Division. This relief is requested for the first inspection interval for the IWE Containment Inspection Program.

### 2.4.3 Licensee's Basis for Relief:

The licensee provided the following information as a basis for the requested relief:

10CFR50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. Preparing a written practice based on the requirements of CP-189, as amended by the requirements of Subarticle IWA-2300, to implement Subsections IWE duplicates criteria already in place. Current Vermont Yankee NDE procedures are written in accordance with the 1986 Edition of Section XI to meet ISI requirements for the 3<sup>rd</sup> Interval Class 1, 2, 3, etc, examinations. Subarticle IWA-2300 of the 1986 Edition requires a written practice based on SNT-TC-1A, as amended by the requirements of Subarticle IWA-2300. Further, Subarticle IWA-2300 of the 1992 Edition, 1992 Addenda, states, "Certifications based on SNT-TC-1A are valid until recertification is required." Visual examination is the primary nondestructive examination method required by Subsections IWE. Neither CP-189 nor SNT-TC-1A specifically includes visual examination; thus, the Code requires qualification and certification to comparable levels as defined in CP-189 or SNT-TC-1A, as applicable, and the Employer's written practice. Development and administration of a second program would not enhance safety or quality and would represent a burden, particularly in preparing a second written practice, tracking of

certifications, and duplication of paperwork. This duplication would also apply to NDE vendor programs.

Relief is requested in accordance with 10CFR50 55a(a)(3)(ii). Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

#### 2.4.4 Proposed Alternative Requirements:

Examinations required by Subsections IWE shall be conducted by personnel qualified and certified to a written practice based on SNT-TC-1A, to the current Section XI Code of record for Subsections IWB, IWC, etc.

#### 2.4.5 Staff Evaluation of Relief Request No. E-4:

In lieu of using the requirements of Section IWA-2300 of the 1992 Edition and Addenda of ASME Section XI that examination personnel be qualified and certified in accordance with ANSI/ASNT CP-189, "Standard for Qualification and Certification of Nondestructive Testing Personnel," the licensee proposes an alternative that examinations are to be conducted by personnel qualified and certified to a written practice based on SNT-TC-1A, as required by ASME Section XI for Quality Groups A, B, and C components.

The staff recognizes that under the licensee's inspection program, examinations are to be conducted by personnel qualified and certified to a written practice based on SNT-TC-1A in accordance with ASME Section XI. The staff also realizes that a written practice based on the requirements of CP-189, as amended by the requirements of Section IWA-2300, to implement Sections IWE and IWL, duplicates efforts already in place for all other subsections. To develop and to administer a second program would not enhance safety or quality and would constitute a burden, particularly in developing a second written practice, tracking of certifications, and duplication of paperwork. In addition, Section IWA-2300 of the 1992 Edition, 1992 Addenda, states that certification based on SNT-TC-1A is valid until recertification is required.

On the basis discussed above, the staff concludes that developing and implementing two qualification programs for NDE personnel would result in a burden on the licensee. The alternative proposed will provide adequate qualifications for personnel performing containment examinations. Therefore, the request for relief is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specific requirements of the Code would result in hardship without a compensating increase in the level of quality and safety.

### 3.0 CONCLUSION

Based on the information provided by the licensee, the staff has concluded that compliance with the code requirements would result in a hardship without a compensating increase in the level of quality and safety. Therefore, these proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii) for the first interval of the IWE Containment Inspection Program.

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Date: May 19, 2000

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