

VERMONT YANKEE NUCLEAR POWER CORPORATION

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BVY 00-89

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

- References:
- (a) Letter, VYNPC to USNRC, "Vermont Yankee's Plans for the 1998 and 1999 Refueling Outages Regarding Reactor Vessel Internals," BVY 97-123, dated September 30, 1997
 - (b) Letter, VYNPC to USNRC, "Reactor Vessel Internal Plans for the 1999 and 2001 Refueling Outages," BVY 99-73, dated May 27, 1999
 - (c) Letter, VYNPC to USNRC, "Deferral of Top Guide and Core Plate Wedge Installation," BVY 99-137, dated October 29, 1999
 - (d) BWRVIP-03, "BWR Vessel and Internals Project Reactor Pressure Vessel and Internals Examination Guidelines"
 - (e) BWRVIP-25, "BWR Core Plate Inspection and Flaw Evaluation Guidelines"
 - (f) BWRVIP-26, "BWR Top Guide Inspection and Flaw Evaluation Guidelines"

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Cancellation of Top Guide and Core Plate Wedge Installation**

In References (a) and (b), Vermont Yankee (VY) informed the Staff of our plans to install top guide and core plate wedges during our 1999 refueling outage as an alternative to performing inspections recommended by the referenced Boiling Water Reactor Vessel Internal Project (BWRVIP) documents for plants without installed wedges. Reference (c) explained why the installation of the wedges was postponed to the 2001 refueling outage.

The purpose of this letter is to inform the NRC that VY has decided to cancel installation of the wedges and to provide our future inspection plans in lieu of top guide and core plate wedge installation. The BWRVIP documents provide guidance for inspection of these reactor vessel internals. In accordance with the commitments made in Reference (a), VY intends to follow the BWRVIP guidance to the extent possible, and to notify the NRC when we deviate from that guidance.

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Top Guide Inspections

For plants without installed wedges, BWRVIP-26, Table 3-2, recommends the following inspections:

- VT-1 of welds in two adjacent aligner assemblies every other cycle.
- For plants whose faulted vertical loads exceed the top guide weight, a VT-1 inspection where the hold-down latches to the shroud should be done, inspecting two hold-down devices, 180 degrees apart, every other cycle.
- Enhanced VT-1 every other cycle of rim weld locations accessible during normal refueling activities.

In accordance with BWRVIP guidelines, VY inspected two of the top guide aligner assemblies and two top guide hold-down assemblies during the 1999 outage. These inspections satisfy the guidance of BWRVIP-26 and BWRVIP-03. Future inspections will also follow this same guidance. In accordance with BWRVIP-26, the next inspections of these components will be performed in 2002 (two cycles after the 1999 inspections). Since VY's top guide configuration does not contain a top guide rim weld, these inspections are not applicable.

Therefore Vermont Yankee meets the guidance of BWRVIP-26 for inspection of the top guide.

Core Plate Inspections

For BWR/4 plants without installed wedges, BWRVIP-25, Table 3-2 recommends the following inspections:

- Enhanced VT-1 (EVT-1) from below the core plate, or ultrasonic testing (UT) from above core plate (once the technique is developed) of 50% of the hold-down bolts.

During the 1999 outage, VY performed VT-3 inspections of 15 of the 30 core plate hold-down bolts from above the core plate, as communicated to the NRC in Reference (c).

For the 2001 refueling outage, VY will again perform VT-3 inspections from above the core plate of 15 core plate hold-down bolts. The UT option is still not possible during the 2001 refueling outage as the inspection technology is still under development and is not available. Enhanced visual inspection of the underside of the bolted connection would require removal of peripheral fuel bundles, control blades, fuel support castings, and control rod guide tubes. Disassembly to this extent is not planned for the 2001 outage.

VY will follow and encourage industry development of the tooling necessary to perform ultrasonic examination of core plate bolts. Re-inspections of the core plate rim hold-down bolts will be performed at the frequency determined in accordance with BWRVIP-25 guidance.

Summary

It has been VY's history and continuing commitment to comply with BWRVIP guidance at the earliest possible date. VY has demonstrated through aggressive decision-making and actions that we follow, to the extent possible, BWRVIP guidance even before final acceptance by the NRC.

VY believes that the inspections planned for 2001 and the future, in addition to the inspections completed in 1999, adequately confirm the integrity of the subject vessel internal components.

Should there be any questions pertaining to this submittal, please contact Mr. Jim DeVincentis at (802) 258-4236.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Don M. Leach
Vice President, Engineering

cc: USNRC Region 1 Administrator
USNRC Resident Inspector – VYNPS
USNRC Project Manager – VYNPS
Vermont Department of Public Service

SUMMARY OF VERMONT YANKEE COMMITMENTS

BVY NO.: 00-89

The following table identifies commitments made in this document by Vermont Yankee. Any other actions discussed in the submittal represent intended or planned actions by Vermont Yankee. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager of any questions regarding this document or any associated commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"
Complete inspection of 15 core plate hold-down bolts during 2001 Refueling Outage	2001 Outage