

VERMONT YANKEE NUCLEAR POWER CORPORATION

185 OLD FERRY ROAD, PO BOX 7002, BRATTLEBORO, VT 05302-7002
(802) 257-5271

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BVY 00-102

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

- References:
- (a) USNRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel," dated January 25, 1988.
 - (b) BWRVIP-75, "BWR Vessel and Internals Project Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules," EPRI Report TR-113932, dated October 1999.
 - (c) Letter, USNRC to Carl Terry, BWRVIP Chairman, "Safety Evaluation of the 'BWR Vessel and Internals Project Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (BWRVIP-75),' EPRI Report TR-113932, October 1999 (TAC No. MA5012)," dated September 15, 2000.

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Request for Alternate Inspection Frequency for Weld Repair Overlays**

In Reference (c), the NRC determined that the industry guidance proposed in Reference (b), as revised by NRC, may be utilized in lieu of previous commitments to Generic Letter (GL) 88-01. Specifically, for GL 88-01 Category E welds, Reference (c) recommends the following inspection schedule:

After three successive satisfactory inspections (once every two refueling cycles) where no indications of crack growth or new cracking is found, the Category E welds repaired by weld overlay using resistant materials may be inspected at a frequency of 25% of the population every 10 years under normal water chemistry, and 10% every 10 years when hydrogen water chemistry and/or noble metal chemical addition is implemented.

There are two weld repair overlays at Vermont Yankee, which cover the Core Spray Category B-F dissimilar metal welds – one at each of the two nozzle-to-safe-end connections. These weld repair overlays were installed in 1986 using Inconel 82, which is considered material resistant to IGSCC, as stated in Appendix A to Reference (c). In accordance with Reference (a), each of the weld overlay areas has undergone a preservice inspection and six inservice examinations [1987, 1989, 1990, 1993, 1995, 1998] since they were applied. No indication of crack growth or new cracking has been detected.

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Reference (b) recommends a 25% sample of weld overlays every ten years for plants with normal water chemistry, and a 10% sample every ten years for plants with hydrogen water chemistry implemented for Category E welds. Reference (c) further stipulates that weld repair overlays must be of resistant material and undergo three successive satisfactory inspections where no indication of crack growth or new cracking is found, before the reduced inspection samples may be initiated.

Vermont Yankee requests NRC approval to examine its GL 88-01 Category E weld overlays in accordance with Reference (b), as modified by Reference (c). The two CS weld repair overlays at Vermont Yankee have met the additional stipulations of Reference (c) noted above.

This initiative will assist in achieving Vermont Yankee's goal of reducing occupational radiation doses in accordance with 10CFR20.1101(b).

Vermont Yankee requests your review and approval of this request by January 2001 to allow us time to adequately plan our Spring refueling outage work. Should there be any questions concerning this request, please contact Mr. Jeffrey Meyer at (802) 258-4105.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

A handwritten signature in black ink, appearing to read "D. Leach", is written over a horizontal line.

Don M. Leach
Vice President, Engineering

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

