VERMONT YANKEE
NUCLEAR POWER CORPORATION

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November 3, 2000
BVY 00-103

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

References:

a) NRC Generic Letter 88-01, Supplement 1, "NRC Position on Intergranular Stess Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping," NVY 92-21, dated February 4, 1992.

b) NUREG-0313, Revision 2, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," published January 1988.

c) Letter, USNRC to PECO Energy Co., "IGSCC Inspection Plan of RWCU System Piping Welds Outboard of the Primary Containment Isolation Valves; Limerick Generating Station, Units 1 and 2 (TAC Nos. M92754 and M92755)," dated February 7, 1996.

d) Letter, USNRC to VYNPC, "NRC Integrated Inspection Report 50-271/97-08," NVY 97-173, dated November 28, 1997.

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Request to Discontinue Examinations of Certain RWCU System Welds

A. Requirements from which alternate measures are requested:

NUREG-0313, Revision 2 (Reference b) provides guidelines for examination of Boiling Water Reactor (BWR) piping welds made of austenitic stainless steel that are four inches nominal diameter or larger containing reactor coolant at temperatures above 200°F during power operation, regardless of code classification. For the portion of the Non-Nuclear Safety (NNS) Reactor Water Cleanup (RWCU) system outside of the outboard isolation valve, NRC Generic Letter 88-01, Supplement 1 (Reference a) provides an acceptable Staff position that 10% of these welds be examined each outage.

Vermont Yankee Technical Specification 4.6.E.1 specifies in part that "Inservice inspection of piping, identified in NRC Generic Letter 88-01, shall be performed in accordance with the staff positions on schedule, methods, and personnel and sample expansion included in the Generic Letter." This request is for approval of alternate measures from those provided in Generic Letter 88-01.

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B. Reference NRC Position:

The Staff's commitment reduction criteria (as listed in Reference c) for NNS RWCU piping welds outboard of the primary containment isolation valves are:

1) Satisfactory completion of Generic Letter 89-10 required actions.

2) No intergranular stress corrosion cracking (IGSCC) detected in RWCU piping welds inboard of the second isolation valves (ongoing GL 88-01 inspection).

3) No IGSCC detected in RWCU piping welds outboard of the second isolation valves after inspecting a minimum of 10% of the susceptible piping welds.

The Staff provides the following IGSCC inspection schedules for these welds:

Schedule A-	Meeting Criteria 1,2 and 3 above or Piping made of resistant material And meeting Criterion 1	No IGSCC inspection required
Schedule B-	Meeting Criterion 1 but not Meeting Criteria 2 or 3	At least 2% of the welds or 2 welds every refueling outage, whichever sample is larger
Schedule C-	Not meeting Criterion 1	At least 10% of the welds Every refueling outage

C. Components For Which Alternate Measures are Requested:

Reactor Water Cleanup (RWCU) system, NNS piping welds outboard of the second containment isolation valves.

D. Basis For Alternate Measures:

Vermont Yankee requests that approval of the elimination of the NNS, RWCU piping welds outboard of the second containment isolation valve examinations, be granted by January 2001, to properly plan for our Spring 2001 Refueling outage. Our basis for this request is that radiation exposure for workers can be substantially reduced in accordance with 10CFR20.1101(b) and the following criteria have been met:

- There has been no IGSCC cracking or other reportable indications detected in piping welds inboard of the second isolation valve during ongoing Generic Letter 88-01 inspections.

- There has been no IGSCC cracking or other reportable indications detected in piping welds outboard of the second isolation valve after inspecting a minimum of 10% of the susceptible piping welds.

- The RWCU system piping is low carbon Type-304 or low carbon Type-316 stainless steel, the welds are low carbon Type-308 stainless steel and the welding was performed using water-backed techniques.

- Of a total of eighty-seven (87) welds in this population, four (4) were examined during the 1990 outage and nine (9) were examined during the each of the 1992, 1993, 1995, 1996, 1998 and 1999 outages. In all, 58 examinations have been performed, resulting in 67% of the total population having been examined. These examinations were performed in accordance with paragraph 5.2.1 of NUREG-0313 and no IGSCC cracking or other reportable indications were detected.

- NRC has closed its review of the GL 89-10 program implemented by Vermont Yankee as noted in Inspection Report 97-08 (Reference d), which states in part: "We have completed a review of the remaining outstanding items for your Generic Letter 89-10, 'Safety-Related Motor-Operated Valve Testing and Surveillance,' program. We determined that you have adequately established a program to verify the design basis of safety-related MOVs. Accordingly, NRC review of the GL 89-10 program has been completed."

E. Conclusion:

As a result of meeting the Staff's criteria, Schedule A, listed in section B above, Vermont Yankee requests approval to discontinue performance of IGSCC examinations of NNS RWCU system piping welds outboard of the second primary containment isolation valve.

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. If you have any questions pertaining to this submittal, please contact Mr. Jeffrey Meyer at (802) 258-4105.

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.: 00-103

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"
None	N/A