VERMONT YANKEE
NUCLEAR POWER CORPORATION
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January 25, 2001
BVY 01-03

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

Reference: Letter, Vermont Yankee to USNRC, "Request For Alternative Testing Per 10CFR50.55a(a)(3)(i), Inservice Testing Program – Excess Flow Check Valves," (BVY 00-99) dated October 31, 2000

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Additional Information Regarding Request
For Alternative Testing Per 10CFR50.55a(a)(3)(i)
Inservice Testing Program – Excess Flow Check Valves

In the referenced letter, Vermont Yankee (VY) submitted for your review and approval a request for relief from the requirements of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, and ASME/ANSI OM, "Operation and Maintenance of Nuclear Power Plants" regarding the testing of excess flow check valves. Based on communications with NRC staff, VY is providing the attached, additional information to supplement the referenced request.

If you have any questions on this transmittal, please contact Mr. Thomas B. Silko at (802) 258-4146.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Don M. Leach
Vice President, Engineering

Attachment

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

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ADDITIONAL INFORMATION ON TESTING EXCESS FLOW CHECK VALVES

The following additional information supplements Vermont Yankee's letter to the USNRC, "Request For Alternative Testing Per 10CFR50.55a(a)(3)(i), Inservice Testing Program – Excess Flow Check Valves," (BVY 00-99), dated October 31, 2000.

Any excess flow check valve (EFCV) failures will be evaluated in accordance with VY's Corrective Action and Inservice Testing (IST) Programs to determine if additional testing or other actions are warranted to ensure maintenance of overall reliability. EFCV failures will be documented in accordance with the Corrective Action Program as an Event Report (ER). A causal analysis will then be conducted as part of the ER investigation. The failure will be evaluated, and appropriate corrective actions will be taken.

To ensure EFCV performance remains consistent with the extended test interval, a minimum acceptance criterion of less than or equal to one failure per year on a three year rolling average will be required. Upon exceeding this criterion, a root-cause analysis is required to determine cause, extent of conditions, an evaluation of the testing interval to ensure reliability of the EFCVs, and a risk analysis of the effects of the failures on cumulative and instantaneous plant safety. Corrective actions to improve performance will be established, as necessary, based on the results of the root-cause analysis.

SUMMARY OF VERMONT YANKEE COMMITMENTS

BVY NO.: 01-03

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	