

VERMONT YANKEE NUCLEAR POWER CORPORATION

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March 19, 2001
BVY 01-12

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

Reference: (a) Letter, VYNPC to USNRC, "Vermont Yankee Response to Generic Letter 89-08: Erosion/ Corrosion-Induced Pipe Wall Thinning," BVY 89-66, dated July 14, 1989.

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Request for Relief from the ASME Code to use Code Case N-597

Pursuant to 10CFR50.55a(a)(3)(i), Vermont Yankee (VY) hereby requests the Nuclear Regulatory Commission (NRC) to approve the use of an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI (IWA 3100) regarding the evaluation of components where the section thickness has been reduced below code minimum thickness. The ASME Boiler and Pressure Vessel Code, Section XI, Paragraph IWA 3100, provides the process for disposition of flaw examination evaluations that exceed the acceptance standards specified in the code applicable to the construction of the component. VY is currently committed to the 1986 Edition (no addenda) of ASME Section XI for inservice inspection activities.

As an alternative to application of IWA-3100, VY proposes to use the provisions of ASME Boiler and Pressure Vessel Code Case N-597 for the analytical evaluation of Class 1, 2 and 3 carbon and low-alloy steel piping components subject to wall thinning as a result of flow accelerated or other corrosion phenomena. ASME approved Code Case N-597 on March 2, 1998. Presently, Code Case N-597 is not contained in the most recent listing of approved code cases contained in Revision 12 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability – ASME Section XI, Division 1." However, the NRC has previously approved use of Code Case N-597 for Hope Creek and Salem Generating Stations on October 12, 2000.

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Based on our review of your basis for approval at the identified stations, VY plans to:

- (1) Implement the application of Code Case N-597 through our 10CFR50 Appendix B procedure program.
- (2) Utilize the criteria contained in Nuclear Energy Institute document NSAC-202L-R2 for calculating wear rates, determining remaining life, predicting wall thickness and performing component inspections. The wear rates will be calculated using methods specified in section 4.6.3 of NSAC-202L-R2.
- (3) Eliminate the ambiguity contained in NSAC-202L-R2 by substituting the word "shall" for "should" or "can" in critical steps related to performing the evaluations.

In addition, Reference (a) provides information on VY's Erosion/Corrosion program which demonstrates that our program satisfies the intent of Generic Letter 89-08, "Erosion/Corrosion Pipe Wall Thinning."

We trust that this information is adequate to support the requested action, however; should you need additional information please contact Mr. Jim DeVincentis at (802) 258-4236.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Gautam Sen
Licensing Manager

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.: 01-12

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