



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 6, 1993

Docket No. 50-271

Mr. James P. Pelletier, Vice President
Engineering
Vermont Yankee Nuclear Power Corporation
580 Main Street
Bolton, Massachusetts 01740-1398

Dear Mr. Pelletier:

SUBJECT: RELIEF FROM THE ASME SECTION XI REQUIREMENT TO UPDATE (ON A 120-MONTH INTERVAL) THE INSERVICE INSPECTION AND TESTING PROGRAMS AT VERMONT YANKEE (TAC NO. M85067)

The Code of Federal Regulations, 10 CFR 50.55a, requires that inservice inspection (ISI) and testing (IST) of certain ASME Code Class 1, 2, and 3 components be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda. The Code of Federal Regulations, 50.55a(f)(4)(ii), and (g)(4)(ii), requires that the ISI and IST programs be updated every 120 months.

The Vermont Yankee second 10-year ISI and IST intervals were scheduled to end on November 30, 1992. By letter dated November 30, 1992, the Vermont Yankee Nuclear Power Corporation (VYNPC) submitted a relief request that would extend the end of the second 10-year ISI and IST intervals from November 30, 1992 to August 31, 1993 (i.e., 9-months). VYNPC requested relief "on the basis that the proposed alternatives would provide an acceptable level of quality and safety" i.e., the existing ISI and IST programs would provide an acceptable level of quality and safety. The Vermont Yankee second 10-year interval ISI and IST Programs were developed to be consistent with the ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition, Summer 1980 Addenda.

While there is no explicit provision in the regulation for extending the 120-month interval, paragraph (b) of 50.55a of the regulation has endorsed, by reference, editions of Section XI of the ASME Code that provide for extending the interval by as much as 1 year. For example, Section XI of the ASME Boiler and Pressure Vessel Code (1988 Addenda) section IWA-2430(d) states that "each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals." Section IWA-2430(e) states that "[i]n addition to IWA-2430(c) and (d) above, for plants that are out of service continuously for 6 months or more, the inspection interval during which the outage occurred may be extended for a period equivalent to the outage and the original pattern of intervals extended accordingly for successive intervals."

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According to VYNPC, "The 1985/86 Recirculation Pipe Replacement/Refueling Outage was 9 months in length." Therefore, the ISI and IST intervals for Vermont Yankee may be extended from December 1, 1992 to August 31, 1993, in accordance with provisions of IWA 2430(e).

Section IWA-2430(f) states that "[t]he inspection frequency for inservice testing of pumps and valves shall be in accordance with the requirements of IWP and IWV."

The staff views the allowance for an extension provided in the Code as a means for licensees to complete inspections during refueling outages which may be scheduled beyond the 120-month interval date. While this allowance is more directly related to ISI than IST, it is acceptable, though not imperative, to maintain the ISI and IST intervals coincident.

Strict adherence to the 120-month interval is not necessary to ensure the operational readiness of the pumps and valves, whose function is required for safety. Operational readiness of the pumps and valves will be adequately assured using the requirements in the licensee's existing ISI and IST Programs until the third interval commences on the later date, i.e., September 1, 1993.

Additionally, the "[t]he Second-Interval IST Program [at Vermont Yankee already] incorporates many of the improvements present in the ASME/ANSI OMa-1988 Addenda to ASME/ANSI OM-1987 (i.e., pump vibration testing and valve stroke time testing). As such, significant revisions to the pump and valve testing methods will not occur upon implementation of the Third-Interval IST Program." The IST requirements for safety and relief valves, including an expansion of the scope of valves to be tested, changed in the 1986 Edition of Section XI. However, the testing frequency for safety and relief valves is based on a 5-year schedule for Class 1 valves and a 10-year schedule for Class 2 and 3 valves. Therefore, extending the date for updating to a later edition of the Code does not significantly impact implementation of the overall testing program. The remainder of the components will continue to be tested to requirements that have not changed or have been deleted by the later editions of the Code.

Conclusion

The provisions of Section XI, Subsection IWA, apply to inservice inspection as well as inservice testing. While it is not mandatory to maintain inservice inspection and inservice testing intervals to the same schedule, it is often desirable in order to maintain the same edition of the Code for all plant activities related to Section XI. Even though 50.55a does not directly discuss extension of the intervals, the Code is incorporated by reference in the regulation. Based on the provisions of IWA-2430(e), and VYNPC's having been out of service continuously for a 9-month period during its second 10-year ISI/IST interval, approval by the NRC of the 9-month extension request is not required; however, it is necessary that the NRC be informed of the extension and that the extension be documented in the ISI and IST programs to avoid any discrepancies in the interval dates.

The third interval ISI and IST programs for Vermont Yankee should comply with the requirements of the latest edition of the Code incorporated by reference in paragraph (b) of 50.55a 12 months prior to the start of the third inspection interval (i.e., referenced in 50.55a as of August 31, 1992), subject to the limitations and modifications listed in paragraph (b) of 50.55a.

The staff is continuing its review of the Vermont Yankee third interval IST Program Plan (TAC Number M85067).

Sincerely,

/s/

Daniel H. Dorman, Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. James P. Pelletier

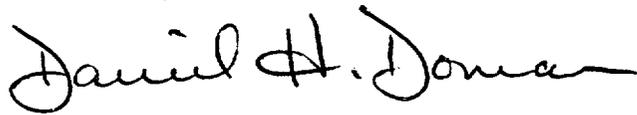
- 3 -

April 6, 1993

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The staff is continuing its review of the Vermont Yankee third interval IST Program Plan (TAC Number M85067).

Sincerely,

A handwritten signature in cursive script that reads "Daniel H. Dorman". The signature is written in dark ink and is positioned above the typed name and title.

Daniel H. Dorman, Project Manager
Project Directorate I-3
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