

Mr. Michael A. Balduzzi  
Senior Vice President and Chief Nuclear Officer  
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185 Old Ferry Road  
P.O. Box 7002  
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July 12, 2001

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION - CORRECTION TO RELIEF  
REQUEST FOR FLOW CHECK VALVE TESTING (TAC NO. MB0415)

Dear Mr. Balduzzi:

On April 2, 2001, the Nuclear Regulatory Commission (NRC) authorized a relief request (RR-V19) pursuant to 10 CFR 50.55a(a)(3)(i), for Vermont Yankee Nuclear Power Station. This action was in response to your letters of October 31, 2000, and January 25, 2001, that submitted the requested relief for excess flow check valve test frequency.

This letter corrects an error in the cover letter and safety evaluation (SE) that stated that the relief request asked for relief from the biennial requirement to verify that the valve position is accurately indicated. The applications of October 31, 2000, and January 25, 2001, did not ask for this relief. The evaluation did not address valve position indication; therefore, this does not affect the conclusion of the SE.

Enclosed please find a corrected page 2 of the SE. We apologize for any inconvenience this may have caused.

Sincerely,  
**/RA/**

Robert M. Pulsifer, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: Page 2 of SE

cc w/encl: See next page

Vermont Yankee Nuclear Power Station

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By letters dated October 31, 2000, and January 25, 2001, Vermont Yankee Nuclear Power Corporation (VYNPC) submitted a relief request (RR-V19) for VY. VYNPC requested relief for various excess flow check valves (EFCV) from the ASME Code inservice tests that are required to be performed every refueling outage as specified in OM-10 Code, Paragraph 4.3.2.2. The staff has completed its review of relief request RR-V19 and is providing the following evaluation.

Excess Flow Check Valves Included in Relief Request RR-V19

SL-13-55A,B,C,D	SL-14-31A,B
SL-2-62A,B,C,D	SL-2-64A,B,C,D
SL-2-73A,B,C,D,E,F,G,H	SL-2-2-7A,B
SL-2-2-8A,B	SL-2-3-11
SL-2-3-13A,B	SL-2-3-15A,B
SL-2-3-17A,B	SL-2-3-19A,B
SL-2-3-21A,B,C,D	SL-2-3-23A,B,C,D
SL-2-3-25	SL-2-3-27
SL-2-3-31A,B,C,D,E,F,G,H,I,J,K,L,M,N,P,Q	
SL-2-3-33	SL-2-3-35
SL-2-305A,B	SL-23-37A,B,C,D

2.0 EVALUATION

EFCVs are installed on boiling-water reactor (BWR) instrument lines to limit the release of fluid in the event of an instrument line break. Examples of EFCV installations include reactor pressure vessel level and pressure instrumentation, main steam line flow instrumentation, recirculation pump suction pressure, and reactor core isolation cooling steam line flow instrumentation. EFCVs are not required to close in response to a containment isolation signal and are not required to operate under post loss-of-coolant accident (LOCA) conditions.

The standard technical specifications (TS) surveillance requirements currently require verification of the actuation (closing) capability of each reactor instrumentation line EFCV every 18 months (or 24 months depending on the plant refueling schedule). This is typical for most BWR plants. The proposed change by the licensee revises the surveillance frequency by allowing a "representative sample" of EFCVs to be tested every 18 months. The "representative sample" is based on approximately 17 percent of the EFCVs being tested each refueling outage such that each valve is tested at least once every 10 years (nominal).

The reactor vessel instrument lines at VY include flow restricting orifices upstream of the EFCVs to limit reactor coolant flow in the event of an instrument line break. The licensee states that: (1) in the unlikely event where an EFCV fails to function properly concurrent with a postulated line break outside containment, orificing and small tube diameters limit flow rates, thus ensuring that the integrity and functional performance of secondary containment is maintained; and (2) the coolant loss under such a scenario is well within the makeup capability of reactor coolant supply systems, and the potential off-site radiological consequences have been evaluated to be substantially below the limits of 10 CFR Part 100.