

# VERMONT YANKEE NUCLEAR POWER CORPORATION

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October 4, 2001  
BVY 01-75

U.S. Nuclear Regulatory Commission  
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Washington, DC 20555

References: (a) USNRC to VYNPC, "Vermont Yankee Nuclear Power Station – Individual Plant Examination of External Events (IPEEE) Submittal (TAC No. M83689)," dated March 22, 2001

**Subject: Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
IPEEE Staff Evaluation Report Comments**

This letter contains comments from our review of your Staff Evaluation Report (Reference a) in regard to our IPEEE submittal.

**Page 1 of Cover Letter and Enclosure 1:** The cover letter and SER state in part that "VY is categorized as a 0.3g focused-scope plant (per NUREG-1407)."

**VY Comment:** It would be more correct to state that Vermont Yankee (VY) is categorized as a "0.3g **modified** focused-scope plant," based upon the clarification provided in Supplement 5 to Generic Letter (GL) 88-20. The requirements for a focused-scope analysis were modified in GL 88-20, Supplement 5 and the VY analysis incorporated these modifications.

**Page 2 of Enclosure 1 – SER:** In Section II, the SER states that "Vermont Yankee was designed with a NUREG/CR-0098 spectrum."

**VY Comment:** VY was designed in the late 1960s and our design can not conform to the asserted NUREG/CR-0098 document that was developed in the late 1970s. It is true that the RLE (Review Level Earthquake) that was used was a 0.3g median shaped spectrum consistent with NUREG/CR-0098. This is more appropriately stated in the TER, Enclosure 2, Section 2.3, page 2.

**Page 2 of Enclosure 3 – Fire Assessment:** In Section 1.1, second paragraph, the TER states that "Engineered safety features (ESFs) include a Reactor Core Isolation Cooling System (RCIC) and the primary containment."

**VY comment:** RCIC is not an Engineered Safety Feature at VY.

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**Page 5 of Enclosure 3 - Fire Assessment:** The TER states in the first paragraph that, “Human error probabilities were included with the alternate shutdown event trees included in the submittal, but the impacts of fire, such as stress and smoke, on the performance of human actions were not discussed.”

**VY Comment:** Section 4.10.1 discusses the mentioned HEPs (human error probabilities). Section 4.12.4.3 addresses operator effectiveness in performing safe shutdown (required to address the Sandia Fire Risk Scoping Issues). This section states that performance of safe shutdown procedures does not require plant operators to pass through or perform manual actions in areas that contain fire or smoke. As stated in Section 4.12.4.1 of the VY submittal, the analysis did not credit any immediate, local operator actions in areas suspected of containing fire or smoke.

**Page 12 of Enclosure 3 of SER - Fire Assessment:** Table of Compartment vs Panel/Cabinet Heat Release Rate (HRR).

**VY Comment:** Compartment “Reactor Building (RB2)” should be Reactor Building (RB3). This appears to be a typographical error; there are no panels/cabinets in RB2.

**Page 22 of Enclosure 3 of SER - Fire Assessment:** The TER states, “The response to SRAI #2 concluded by stating that the VY IPEEE fire scenario screening approach for panels and cabinets is consistent with the revised EPRI guidance for responding to Generic RAI #11 and did not use the FPRAIG “fully enclosed sources” criterion to screen enclosed ignition sources from further analysis.”

**VY Comment:** Our response to SRAI #2 stated that we did not employ the TR-105928 “fully enclosed sources” criterion as a condition to screen **all** enclosed ignition sources from further analysis. Low energy cabinets and low energy panels were screened from detailed evaluation based on the no-ventilation criteria of the FPRAIG (EPRI Fire PRA Implementation Guide). This is consistent with the methodology in Generic RAI #11.

**Page 24 of Enclosure 3 - Fire Assessment:** Table of Fire Compartment CDFs.

**VY Comment:** The CDF for SGW under CDF (RAI #2) should be 1.2E-05/yr as identified in VY’s response to the SRAI.

**Page 1 of Enclosure 5 – Flooding Assessment:** Second paragraph of the Evaluation section provides the circulating water system as an example of a closed system.

**VY Comment:** The circulating water system at VY is an open system. An appropriate example of a closed system at VY would be the Reactor Building Closed Cooling Water (RBCCW) system.

**Page 3 of Enclosure 5 – Flooding Assessment: Items (2), (4) and (7).**

**VY Comment:** Item 2 should indicate elevation 252' (not elevation 242'), 30" and 24" diameter sleeves (not 30" and 40" diameter sleeves) and that the sleeve heights were lowered to improve water removal **and direct it to** the torus room (not **from** the torus room). Item 4 should say enhance flood **protection** and not propagation. Item 7 should indicate that the latch was removed from the switchgear room "vestibule" door, not the switchgear room door itself.

We request you review our comments and revise the IPEEE staff evaluation report as necessary. If you have any questions on this submittal, please contact Mr. Jeffrey Meyer at (802) 258-4105.

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

