

# VERMONT YANKEE NUCLEAR POWER CORPORATION

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December 11, 2001  
BVY 01-90

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

- References:**
- a) Letter, USNRC to VYNPC, "Service Water Systems Affecting Safety - Related Equipment (Generic Letter 89-13)," NVCY 89-156, dated July 18, 1989.
  - b) Letter, USNRC to VYNPC, "Service Water Systems Affecting Safety - Related Equipment (Generic Letter 98-13 - Supplement 1)," NVCY 90-86, dated April 4, 1990.
  - c) Letter, VYNPC to USNRC, "Response to Generic Letter 89-13, Service Water System Problems Affecting Safety - Related Equipment," BVY 90-007, dated January 22, 1990.
  - d) Letter, USNRC to VYNPC, "Vermont Yankee Design Inspection (NRC Inspection Report No. 50-271/97-201)," NVCY 97-130, dated August 27, 1997.
  - e) Letter, VYNPC to USNRC, "Reply to Inspection Report No. 50-271/97-201," BVY 97-138, dated October 27, 1997.
  - f) Letter, USNRC to VYNPC, "NRC Inspection Report 50-271/97-10, Notice of Violation, and Exercise of Discretion," NVCY 98-14, dated February 5, 1998.
  - g) Letter, VYNPC to USNRC, "Reply to Notice of Violation - NRC Inspection Report 50-271/97-10," BVY 98-33, dated March 6, 1998.
  - h) NRC Regulatory Issue Summary 2000-17 "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC staff," NVCY 00-97, dated September 21, 2000.

**Subject: Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
Update on Vermont Yankee Generic Letter 89-13 Program  
Relative to RHR Heat Exchange Testing and Maintenance Practices**

Generic Letter (GL) 89-13 and the associated supplement (References (a) and (b)) provided a summary of problems that were experienced in service water systems that could have affected a system's ability to meet design requirements. The intent of the GL was to assure that the service water systems satisfied design requirements and were capable of accomplishing their safety functions. The GL and supplement provided a variety of options for verifying station components satisfied design requirements.

In Reference (c), Vermont Yankee (VY) noted that the two Residual Heat Removal (RHR) Heat Exchangers were inspected, cleaned and eddy current tested during the 1989 outage. Also, VY noted that the two RHR Heat Exchangers will be tested by measurement of their heat transfer capability during the 1990 outage and again during the two subsequent refueling outages. Based on this testing data, a frequency will be determined to provide assurance that the heat removal capability is maintained. In response to a design inspection (References (d) through (g)), VY performed additional testing of the RHR heat exchangers that further verified that they were capable of accomplishing their safety functions.

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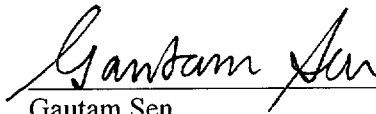
VY has continued the practice of performing cleaning and inspection every operating cycle and has also performed periodic testing. Testing of the heat exchangers introduces a degree of outage risk because the testing is performed immediately following a plant shutdown when heat loads are high and time to boil is very short. Based on this, VY investigated changing the commitment to rely on the periodic cleaning and inspection. VY believes that we have performed sufficient testing of the RHR heat exchangers to validate that a once-per-cycle cleaning/inspection frequency is adequate to ensure that the heat exchangers will satisfy their design requirements without additional testing. Based on this, VY has discontinued plans for future testing and will rely on a periodic maintenance method consisting of a once-per-cycle cleaning and inspection.

No NRC action is requested on this issue. VY has evaluated this commitment change in accordance with our process for implementing the guidance provided in Reference (h) and determined that prior NRC approval is not required. This letter serves to update our docket relative to this prior commitment. This change in commitment continues to satisfy the intent of GL 89-13.

We trust that the information provided is adequate; however, should you have questions or require additional information, please contact Mr. Jim DeVincentis at (802) 258-4236.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Gautam Sen  
Licensing Manager

Attachment

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.:** 01-90 "Update on Vermont Yankee Generic Letter 89-13 Program Relative to RHR Heat Exchange Testing and Maintenance Practices"

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<br>OR "OUTAGE" |
|---|-------------------------------|
| Update Generic Letter 89-13 program document(s) to<br>Require inspection and cleaning of the RHR Heat<br>Exchangers and eliminate periodic testing. | Once-per-cycle                |
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