

VERMONT YANKEE NUCLEAR POWER CORPORATION

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May 9, 2002
BVY 02-31

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

References: (a) Letter, USNRC to VYNPC, "Safety Evaluation of the Inservice Testing Program for Pumps and Valves, Third Interval Plan, Revision 19, Vermont Yankee Nuclear Power Station (TAC NO. MA4503)," NVCY 99-29, dated March 12, 1999.

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Request for use of Alternate "Acceptance Criteria"
for the IST Program per 10CFR50.55a(a)(3)(ii)**

Pursuant to 10CFR50.55a(a)(3)(ii), Vermont Yankee (VY) hereby requests to use ISTB 6.2, "Acceptance Criteria," and its related requirement ISTB 4.6, "New Reference Values," from the OM-1995 Edition with OMA-1996 addenda in lieu of OMA-1988, paragraph 6.1, "Acceptance Criteria."

Attachment 1 provides the scope and justification for use of the alternative acceptance criteria. Approval for the use of the alternative provisions is requested by October 1, 2002 so that we can be prepared to use it if needed to support the scheduled Refueling Outage. Upon approval, the alternative method will be incorporated into our IST Program Plan that was approved per Reference (a).

If you have any questions on this transmittal, please contact Mr. Jim DeVincentis (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

A047

Attachment 1

Vermont Yankee Nuclear Power Corporation

Relief Request RR-P11, Revision 0

RELIEF REQUEST

Number: RR-P11, Revision 0

SYSTEM: Various

COMPONENTS: Various

EXAM OR TEST CATEGORY:

ASME/ANSI OM-1987 with OMa-1988 addenda, Part 6, Paragraph 6.1, "Acceptance Criteria"

CODE REQUIREMENT:

In accordance with ASME/ANSI OMa-1988, Part 6, Paragraph 6.1, "Acceptance Criteria," if deviations fall within the alert range of Table 3, the frequency of testing specified in paragraph 5.1 shall be doubled until the cause of the deviation is determined and the condition corrected. If the deviations fall within the required action range of Table 3, the pump shall be declared inoperable until the cause of the deviation has been determined and the condition corrected.

REQUEST FOR RELIEF:

Relief is requested from the current requirements of ASME/ANSI OM-6, 1987 Edition, OMa-1988 Addenda, paragraph 6.1, "Acceptance Criteria." Vermont Yankee (VY) proposes to use the OM-1995 Edition, OMa-1996 Addenda, Subsection ISTB, paragraph 6.2, "Acceptance Criteria," and its related requirement ISTB 4.6, "New Reference Values" in lieu of the OMa-1988 paragraph 6.1, "Acceptance Criteria."

10CFR50.55a requires inservice testing (IST) of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (i.e., the Code) and applicable addenda, except where alternatives have been authorized or relief has been requested and granted by the NRC, as described in the station IST Program. 10CFR50.55a(a)(3) allows for alternatives to the requirements of 10CFR50.55a(f) if conformance with the proposed alternatives would provide an acceptable level of quality and safety, or compliance with the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Relief is requested per 10CFR50.55a(a)(3)(ii) on the basis that compliance with the Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

It is an unnecessary hardship to replace or repair a pump that is still operating within acceptable design parameters as determined through analysis. The repair or replacement involves rendering the associated subsystem inoperable and unavailable. Replacement or repair of a pump in this condition unnecessarily increases the unavailability of the pump and its associated subsystem and is not consistent with availability goals established in accordance with 10CFR50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Furthermore, repairing or replacing a pump that is operating acceptably and within its design parameters does not provide a compensating increase in the level of quality and safety.

ALTERNATE METHOD:

VY proposes to use ISTB 6.2, "Acceptance Criteria," and its related requirement ISTB 4.6, "New Reference Values," from the OM-1995 Edition with OMa-1996 addenda in lieu of OMa-1988, paragraph 6.1, "Acceptance Criteria."

References to Table ISTB 5.2.1-1, Table ISTB 5.2.1-2, Table ISTB 5.2.2-1 and Table ISTB 5.2.3-1 shall be understood to refer to the Ranges and Test Parameters in OMa-1988, Part 6, Table 3. VY will continue to test the pumps at the frequency specified in OMa-1988, paragraph 5.1 "Frequency of Inservice Tests."

The ASME OM-1995 Code, currently incorporated by reference in 10CFR50.55a, Subsection ISTB 6.2, "Acceptance Criteria," specifies the actions to be taken for pumps in the alert range (ISTB 6.2.1); for pumps in the required action range (ISTB 6.2.2), and for systematic error (ISTB 6.2.3). In particular, ISTB 6.2.2 provides that for pumps in the required action range an analysis may be performed and new reference values established in accordance with paragraph ISTB 4.6. Paragraph ISTB 4.6, "New Reference Values," allows that in cases where the pump test parameters are either within the alert or required action ranges of Table ISTB 5.2.1-1, Table ISTB 5.2.1-2, Table ISTB 5.2.2-1 or Table ISTB 5.2.3-1, and the pump's continued use at the changed values is supported by an analysis, a new set of reference values may be established. This paragraph also requires that the analysis shall include both a pump level and a system level evaluation of pump operational readiness, the cause of the change in pump performance, and an evaluation of all trends indicated by available data.

The reasonable assurance of a pump's operational readiness in this condition will be provided by the following:

- The pump's continued use is supported by analysis.
- The analysis includes verification of the pump's operational readiness.
- The analysis shall include both a pump level and a system level evaluation of operational readiness.
- The cause of the change in pump performance shall be determined.
- An evaluation shall be performed of all trends indicated by available data.
- The results of this analysis shall be documented in the record of tests.

