



January 22, 2003
BVY 03-10

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

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Fourth-Interval Inservice Testing (IST) Program Plan and
Request for Approval of IST Relief Requests

Vermont Yankee Nuclear Power Station (VY) has revised the Inservice Testing (IST) Program as required by 10CFR50.55a(f)(4)(ii) for the fourth 10-year interval starting September 1, 2003.

This submittal docket VY's IST Program Procedure (PP 7013) and requests NRC approval of IST relief requests. The IST Program is broken down into three major components:

- IST Program Procedure, which is an upper tier document,
- IST Program Plan, which is Appendix A, Appendix B and Tables 1-21 and contains the applicable Code commitment text, component specific test requirement tables, cold shutdown justifications, refueling outage justifications, relief requests and technical positions as applicable, and
- IST Component Database.

A summary of the four pump relief requests, the components affected, and the precedent is contained below. Detailed discussion of each of the four pump relief requests begin on page 68 of Appendix A.

RR-P01	Service Water pumps	A similar request was approved for the 3 rd ten-year interval. ¹ This request differs from the one previously approved in that VY does not propose to disassemble and examine the Service Water pumps on a fixed frequency, but rather as indicated by the results of periodic testing
RR-P02	HPCI main/booster pump combination	This alternative was previously approved for the 3 rd ten-year interval as RR-P04, Revision 1. ²
RR-P03	Diesel Fuel Oil Transfer pumps	This alternative was previously approved for the 3 rd ten-year interval. ³
RR-P04	RCIC pumps	This alternative was previously approved for the 3 rd ten-year interval as RR-P10, Revision 2. ⁴

¹ USNRC Letter to VYNPC, NVCY 93-151, "Safety Evaluation of the Inservice Testing Program Relief Requests for Pumps and Valves, TAC No. M85067," dated September 3, 1993.

² USNRC Letter to VYNPC, NVCY 99-03, "Request or Alternative Testing Regarding the Inservice Testing (IST) Program, TAC No. MA4273," dated January 14, 1999.

³ Same as footnote 1 above.

⁴ Same as footnote 2 above.

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A summary for both of the valve relief requests, the components affected, and the precedent is contained below. Detailed discussion for both of the valve relief requests start on page 50 of Appendix B.


RR-V01	Various Valves	This alternative was previously approved by the NRC for VY's 3 rd ten-year interval as relief requests RR-V13 and RR-V14. ⁵ The components, Code requirements, plant conditions and proposed alternatives are unchanged from those previously approved.
RR-V02	Instrumentation line excess flow check valves	This alternative was previously approved for the 3 rd ten-year interval as RR-V19. ⁶

Attachment 1 identifies the commitments made in this letter. Attachment 2 contains the subject Program.

VY requests timely NRC review and approval of the IST Relief Requests in order to support implementation of the new program.

If you have any questions on this transmittal, please contact Mr. Thomas B. Silko at (802) 258-4146.

Sincerely,



Michael A. Balduzzi
Vice President, Operations

Attachments

cc: USNRC Region 1 Administrator
USNRC Resident Inspector - VY
USNRC Project Manager - VY
Vermont Department of Public Service

⁵ USNRC Letter to VYNPC, NVE 98-03, "Safety Evaluation of Relief Requests for the Third Interval Pump and Valve Inservice Testing Program, TAC No. M97544," dated January 15, 1998.

⁶ USNRC Letter to VYNPC, NVE 01-28, "Relief Request for Excess Flow Check Valve Testing in the Pump and Valve Inservice Test Program, TAC No. MB0415," dated April 2, 2001.