



April 1, 2003  
BVY 03-28

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 Inspection Program Plan,  
Fourth-Interval Inservice Inspection Pressure Test Program and  
Request for Approval of ISI Relief Requests**

Vermont Yankee Nuclear Power Station (VY) has revised the Inservice Inspection (ISI) Program and Pressure Test Program as required by 10CFR50.55a(g)(4)(ii) for the fourth 10-year interval starting September 1, 2003.

This submittal docket VY's ISI Program Procedure (PP 7015) and requests NRC approval of the identified ISI relief requests. The ISI Program is broken down into five major sections:

- ISI Program Procedure, which is an upper tier document,
- Appendix A to PP7015 contains a detailed discussion of each of the relief requests,
- Appendix B documents the Selection and Bases Tables,
- Appendix C contains the Examination and Schedule Tables, and
- Appendix D contains the Calibration Block Index.

It is noted that the attached program incorporates alternative inspection and examination requirements for components governed by certain Code Cases as outlined in Draft Regulatory Guide DG-1091 (Proposed Revision 13 of Regulatory Guide 1.147) published in December 2001. The specific code cases utilized are identified on page 4 and 5 of the Program Procedure.

A summary of the relief requests associated with the ISI Program Plan and any precedent is contained below. Detailed discussion of each of the relief requests is contained in Appendix A of PP 7015.

ISI-02	Use of Code Case N-560 as an alternative to ASME Section XI, Category B-J for Examination of Piping Welds.	The relief granted for VY's Third Interval is still applicable for the Fourth Interval. The use of risk-informed methodology for selection of components for examination embodies VY's philosophy for Class 1 piping inspection.
ISI-03	Use of Code Case N-652 as an alternative to ASME Section XI, Categories B-G-1, B-G-2, and C-D for Examination of Bolting.	Code Case N-652 has been approved by ASME but has not yet been included in the most recent listing of code cases provided in Revision 12 to Regulatory Guide 1.147.

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ISI-04	Use of N-663 as an alternative to ASME Section XI, Class 1, Categories B-F, C-F-1 and C-F-2 for Surface Examinations.	The use of this ASME approved Code Case is similar to the request submitted by the Entergy South Licensees.
ISI-05	Alternative Requirements to ASME Section XI, Appendix VIII, Supplement 10 for Examination of Dissimilar Metal Welds.	This proposed alternative is essentially identical to the model provided by EPRI on their Performance Demonstration Initiative.
ISI-07	Use of BWRVIP-75 as an alternative to GL 88-01 for Frequency of Overlay Examinations.	The relief granted for VY's Third Interval is still applicable for the Fourth Interval. BWRVIP-75, published in October 1999, and the NRC's Safety Evaluation of BWRVIP-75 are still the current applicable guidance documents for inspection of structurally overlaid components.
ISI-08	Use of RMS for Grading Purposes as an alternative to ASME Section XI, Appendix VIII, Supplement 4, Paragraph 3.2.c for Examination of RPV Shell Welds.	This proposed alternative is derived from the model provided by EPRI on their Performance Demonstration Initiative.
ISI-09	Use of Code Case N-613 as an alternative to ASME Section XI, Appendix VIII, Supplement 7 for Examination of RPV Nozzle-to-Shell Welds.	This proposed alternative is essentially identical to the model provided by EPRI on their Performance Demonstration Initiative.
ISI-10	Alternative Requirements to ASME Section XI, Appendix VIII, Supplement 11 for Examination of Overlaid Piping.	This proposed alternative is essentially identical to the model provided by EPRI on their Performance Demonstration Initiative.
ISI-11	Use of Appendix VIII of ASME Section XI, as modified by 10CFR50.55a(b)(2), for Examination of RPV Flange-to-Shell Weld.	The NRC has granted similar relief to several other Licensees as described in the particular relief request.

A summary of the relief request and precedent associated with the ISI Pressure Test Program is contained below. A more detailed discussion of this relief request is contained in Appendix A of PP 7034.

PT-1	Use of a system leakage test in lieu of the Class 3 "Interval" hydrostatic test.	The requested alternative is similar to ASME approved Code Case N-498-1 which is contained within Regulatory Guide 1.147 Revision 12. This request also similar to VY's Third Inservice Inspection Interval approved relief request P-3.
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The ISI Program Plan, Pressure Test Program and the remainder of VY's Section XI programs utilize the ASME Section XI, 1998 Edition with 2000 Addenda. Accordingly, this letter requests NRC acceptance for these programs to be based upon the aforementioned Edition / Addenda.

Attachment 1 identifies the commitments contained within this letter. Attachment 2 contains the ISI Program Plan. Attachment 3 contains the ISI Pressure Test Program.

VY requests timely NRC review and approval of the ISI 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,

  
Robert Wanczyk  
Director, Nuclear Safety

**Attachments**

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