

From: Rick Ennis
To: Paul
Date: 1/9/04 10:52AM
Subject: RE: NPSH for BWR Extended Power Upgrades (EPU)

Paul,

The NRC staff is aware of your concerns and I can assure you that the requirements for net positive suction head (NPSH), as it pertains to the Vermont Yankee (VY) Extended Power Uprate (EPU) amendment request, are not "being ignored." As I mentioned in my email to you on 1/8/04, Section 2.6.5 of the NRC's review standard for EPUs (RS-001) addresses the criteria we will use in evaluating the effects of the EPU on NPSH. As discussed in RS-001, Section 2.6.5, "Specific review criteria are contained in SRP [Standard Review Plan] Section 6.2.2, as supplemented by Draft Guide (DG) 1107." The State of Vermont, in a letter to the NRC dated December 8, 2003 (Accession No. ML033440399), requested clarification on the NPSH criteria in SRP 6.2.2 and DG 1107 with respect to the VY EPU amendment request. The staff is in the process of responding to that letter. Our response will be publicly available in ADAMS.

Since the VY EPU amendment review is still in progress, the NRC staff has not reached a decision on whether the proposed amendment would be in conformance with all applicable regulations. Therefore, your statement that "VY is violating these requirements" is incorrect in that the proposed changes are not presently implemented and cannot be implemented prior to NRC approval of the amendment request. As I'm sure you are aware, there will be opportunities for public comment during the amendment review process.

Please call me if you would like to discuss these issues further.

Thanks,

Rick Ennis
301-415-1420

>>> "Paul" <pdblanch@comcast.net> 01/08/04 11:27AM >>>

Rick:

Thanks for your prompt response. I am very familiar with the referenced document and also the SER for Brunswick EPU. Neither one of these documents responds to my concern restated below. My review clearly indicates that VY is violating these requirements and the NRC appears to be looking the other way.

Please explain why these requirements are being ignored.

If my memory serves me correctly, I recall that there are specific criteria for post LOCA NPSH contained within Regulatory Guides 1.1 and 1.82 and also Generic Letter 97-04. Could you please explain to me why these criteria are apparently not part of the acceptance criteria for the Vermont Yankee upgrade? It may be possible that I have only reviewed the non-proprietary copies of these documents and the proprietary version contains the missing information. If this is the case, please confirm this.

-----Original Message-----

From: Rick Ennis [mailto:RXE@nrc.gov]

Sent: Wednesday, January 07, 2004 4:09 PM

To: pdblanch@comcast.net

Cc: Anthony McMurtray; Cornelius Holden; Darrell Roberts; Eric Leeds;

Tad Marsh; Mohammed Shuaibi; Richard Lobel; William Ruland

Subject: Re: NPSH for BWR Extended Power Upgrades (EPU)

Paul,

Bill Ruland forwarded your email to me since I am the NRR Vermont Yankee project manager. The NRC plans to review the Vermont Yankee Extended Power Uprate (EPU) amendment request using NRC Review Standard RS-001. A copy of RS-001 can be found on our website at:

<http://www.nrc.gov/reactors/operating/licensing/power-uprates.html#relatedregs>

RS-001, Section 2.6.5 discusses the specific review criteria we will use to evaluate the effects of the EPU on NPSH.

As discussed in the attached letter from the NRC to Entergy dated 12/15/03, the staff has requested Entergy to provide further information related to the CPPU topical report you referenced as well as providing the technical information needed to support the review areas contained in RS-001.

Please let me know if you have any questions.

Rick Ennis
301-415-1420

>>> "Paul Blanch" <pdblanch@comcast.net> 01/05/04 02:02PM >>>
Bill:

During my search of ADAMS I came across a letter authored by you addressed to General Electric dated March 31, 2003. This letter is titled "REVIEW OF GE NUCLEAR ENERGY LICENSING TOPICAL REPORT NEDC-33004P, REVISION 3, "CONSTANT PRESSURE POWER UPRATE"

I also noted NEOD-33090 dated September 2003 titled "SAFETY ANSAYSIS REPORT FOR VERMONT YANKEE NUCLEAR POWER STATION CONSTANT PRESSURE POWER UPRATE"

I note that both of these documents discuss the requirements for the NPSH for the ECCS pumps however, the specific review criteria seems to be missing from my copy of these documents.

If my memory serves me correctly, I recall that there are specific criteria for post LOCA NPSH contained within Regulatory Guides 1.1 and 1.82 and also Generic Letter 97-04. Could you please explain to me why these criteria are apparently not part of the acceptance criteria for the Vermont Yankee upgrade? It may be possible that I have only reviewed the non-proprietary copies of these documents and the proprietary version contains the missing information. If this is the case, please confirm this.

I would also appreciate a list of other BRW upgrades where these criteria may not have been specifically addressed during the NRC's review process.

Paul M. Blanch

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West Hartford, CT 06117

Cell 860-881-6011

Office 860-236-0326

FAX 801-991-9562

CC: Anthony McMurtray; Arnie Gundersen; Bill Sherman; Brian Hobbs; Cliff Anderson; Cornelius Holden; Darrell Roberts; Dave Lochbaum; David Pelton; Eric Leeds; Francis Cameron; George Mulley; Gregory Cwalina; Jim DeVincitis; Mohammed Shuaibi; Raymond Shadis; Richard Lobel; Ronda Daflucas; Tad Marsh; William Ruland

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Subject: RE: NPSH for BWR Extended Power Upgrades (EPU)**Creation Date:** 1/9/04 10:52AM**From:** Rick Ennis**Created By:** RXE@nrc.gov

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kp1_po.KP_DO CJA CC (Cliff Anderson) DLP1 CC (David Pelton)	Delivered	01/09/04 10:53AM
owf2_po.OWFN_DO ACM2 CC (Anthony McMurtray) GCC CC (Gregory Cwalina) MAS4 CC (Mohammed Shuaibi) RML CC (Richard Lobel)	Delivered	01/09/04 10:52AM
owf4_po.OWFN_DO CFH CC (Cornelius Holden) DJR CC (Darrell Roberts) EJL CC (Eric Leeds) LBM CC (Tad Marsh) WHR CC (William Ruland)	Delivered	01/09/04 10:52AM
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