August 6, 2004

MEMORANDUM TO: Allen G. Howe, Chief, Vermont Yankee Section
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager, Vermont Yankee Section
Project Directorate I ***/RA/***
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION, DRAFT REQUEST FOR ADDITIONAL INFORMATION (TAC NO. MC0960)

The attached draft request for information (RAI) was transmitted on August 6, 2004, to Ms. Ronda Daflucas of Entergy (the licensee). This information was transmitted to facilitate a upcoming conference call in order to clarify the licensee's relief request RI-01 for Vermont Yankee Nuclear Power Station dated October 1, 2003, as supplemented by letters dated December 23, 2003, and January 22, 2004. The licensee's submittal proposes to use various Boiling Water Reactor Vessels Internal Program (BWRVIP) guidelines as an alternative to certain requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for Inservice Inspection of Reactor Pressure Vessel internal components.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket No. 50-271

Attachment: Draft RAI

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

RELATED TO RELIEF REQUEST RI-01

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

By letter dated dated October 1, 2003, as supplemented by letters dated December 23, 2003, and January 22, 2004, Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (Entergy or the licensee) submitted relief request RI-01 for Vermont Yankee Nuclear Power Station (VYNPS). The licensee's submittal proposes to use various Boiling Water Reactor Vessels Internal Program (BWRVIP) guidelines as an alternative to certain requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for Inservice Inspection of Reactor Pressure Vessel (RPV) internal components.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed relief request and would like to discuss the following issues to clarify the submittals:

1. Relief request RI-01 includes the following statement as an all-inclusive technical basis for the proposed alternative inspections:

> The NRC has agreed with the BWRVIP approach in principal and has issued Safety Evaluations for these guidelines. Therefore, use of these guidelines, as an alternative to the subject Code requirements, provides an acceptable level of quality and safety and will not adversely impact the health and safety of the public.

   The technical basis for the proposed alternative inspection of each component, or group of components, is not specified in the relief request. For each component, or group of components for which relief from the ASME Code is requested, discuss how the proposed alternative inspection method, scope of examination, inspection frequency, and acceptance criteria provide an acceptable level of quality and safety as compared to the ASME Code.

2. The licensee should provide an explanation on the term "number" shown under "Table Key" in Table 1 of BVY 04-07, Attachment 2 of the submittal dated January 22, 2004. For example, in Table 1 under the column 2007, the planned inspection for Control Rod Drive Guide Tube Body Welds is EVTI (4). It is understood that 4 welds will be inspected for this component. However, there is no information on the total number of welds that exist in the subject component. Provide the total population of the welds for each component.

ATTACHMENT