Entergy

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September 23, 2004

Docket No. 50-271
BVY 04-100
TAC No. MC0761

Subject: **Vermont Yankee Nuclear Power Station**
Technical Specification Proposed Change No. 263 – Supplement No. 15
Extended Power Uprate – Response to Steam Dryer Action Item No. 2

References:
1) U.S. Nuclear Regulatory Commission, "Summary of July 21 and 22, 2004, Meetings with Entergy Nuclear Operations, Inc. on Steam Dryer Analysis for Vermont Yankee Nuclear Power Station (TAC No. MC0761)," Meeting Summary Accession No. ML042220022, September 2, 2004

2) Entergy letter to U.S. Nuclear Regulatory Commission, "Vermont Yankee Nuclear Power Station, Technical Specification Proposed Change No. 263 – Supplement No. 13, Extended Power Uprate – Response to Steam Dryer Action Items," BVY 04-097, September 14, 2004

This letter provides additional information in support of the application by Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (Entergy) for a license amendment to increase the maximum authorized power level of the Vermont Yankee Nuclear Power Station (VYNPS) from 1593 megawatts thermal (MWt) to 1912 MWt. During meetings held with the NRC staff on July 21 and 22, 2004, Entergy agreed to provide certain additional information regarding the structural analysis of the VYNPS steam dryer. Reference 1 provides a summary of those meetings and identifies ten Action Items. Reference 2 provided Entergy's response to nine of the ten Action Items, and Attachment 1 to this letter responds to the remaining Action Item.

This supplement to the license amendment request provides additional information to clarify Entergy's application for a license amendment and does not change the scope or conclusions in the original application, nor does it change Entergy's determination of no significant hazards consideration.

New regulatory commitments made in this submittal are contained in Attachment 2.

If you have any questions or require additional information, please contact Mr. James M. DeVincentis at (802) 258-4236.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 23, 2004.

Sincerely,

Jay K. Thayer
Site Vice President
Vermont Yankee Nuclear Power Station

Attachments (2)

cc: Mr. Richard B. Ennis, Project Manager (w/attachments)
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Mr. Samuel J. Collins (w/o attachments)
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USNRC Resident Inspector (w/o attachments)
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Mr. David O'Brien, Commissioner (w/attachments)
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Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 263 – Supplement No. 15

Extended Power Uprate

Response to Steam Dryer Action Item No. 2

Total number of pages in Attachment 1 (excluding this cover sheet) is 10.

RESPONSE TO STEAM DRYER ACTION ITEM NO. 2 RELATED TO EXTENDED POWER UPRATE REQUEST VERMONT YANKEE NUCLEAR POWER STATION

Action Item No. 2

Entergy agreed to provide additional details on the power ascension test plan including plans for monitoring the steam dryer, as well as other plant systems and components, for flow induced vibration (FIV). This would include the acceptance criteria that will be used.

Entergy Response to Action Item No. 2

The Vermont Yankee Nuclear Power Station (VYNPS) extended power uprate (EPU) power ascension test plan evaluates FIV data for acceptability at defined testing power levels.

PIPING MONITORING

As described in the response to NRC request for additional information (RAI) EMEB-B-12 in Entergy's letter of July 2, 2004 (BVY 04-058), the VYNPS piping steady state vibration program for EPU power ascension testing follows the guidance in Part 3 of the ASME OM-S/G-2000[1] standard (hereinafter referred to as ASME OM-3). The program assesses the flow-induced steady state vibration levels of selected piping systems that are expected to experience increased flow during EPU operating conditions. The program includes branch lines and cantilevered small bore lines which industry experience has shown are vulnerable to high-cycle fatigue failures. During EPU power ascension testing, vibration data will be taken at approximately 2.5% power increments between 100% and 120% of current licensed thermal power (CLTP) levels. The data will be evaluated for acceptability in each of the three vibration monitoring groups as follows.

Vibration Monitoring Group No. 1

This group includes the main steam (MS) and feedwater (FW) piping located in the drywell which is inaccessible during plant operation. These pipes will be monitored for vibration levels utilizing direct mounted accelerometers.

The piping vibration stress acceptance criteria are based on the guidance in ASME OM-3. The design basis for the MS and FW piping is the ANSI/ASME B31.1 Power Piping Code (due to piping upgrades, different code editions apply). The stress criteria in ASME OM-3 are based on Section III of the ASME Code, 1986 Edition. Meeting the acceptance criteria demonstrates that the steady state flow-induced vibration stress levels of the MS and FW piping remain below the appropriate endurance limit of the piping material as defined in ASME OM-3. Branch lines may be excluded from further evaluation if the measured main piping vibration levels near the branch locations are found to meet the acceptance criteria. If any stress levels are found to be significant, the measured main piping response and/or the measured response from

[1] ASME *Standards and Guides for Operation and Maintenance of Nuclear Power Plants*, 2000 Edition, including 2001 and 2002 Addenda

accelerometers mounted near or on the branch line will be used to evaluate the affected branch line(s).

Vibration Monitoring Group No. 2

The FW regulator valves and attached FW piping located downstream of the reactor feed pumps are located in the accessible feed pump room and will be monitored with a hand-held vibration meter. Baseline readings have been taken at 100% of CLTP. During EPU power ascension, if the measured data indicate that vibration levels are increasing significantly, the affected components will be further evaluated. The determination of a significant increase in vibration level may be based on a comparison of measured variables (e.g., deflection) or engineering judgment. The acceptance criteria are being developed based on the guidance in ASME OM-3. As with the acceptance criteria for Group No. 1, the stress intensification factors will be consistent with the applicable editions of ANSI/ASME B31.1.

Vibration Monitoring Group No. 3

Visual monitoring will be employed during EPU power ascension testing to determine if significant vibration is occurring in main steam, feedwater and condensate piping located in the VYNPS turbine building heater bay. Visual monitoring is accomplished by walkdowns and/or cameras. Baseline monitoring has been performed at 100% of CLTP. During EPU power ascension, if visual observations indicate significant increased vibration, the piping will be further monitored with a hand-held device and Vibration Monitoring Group No. 2 acceptance criteria will be used. Walkdowns performed during the spring 2004 refueling outage revealed no indications of damage to piping (including attached small bore lines), pipe supports and attached components.

Two cantilevered, small bore FW piping lines containing large valves were changed to a weld design with increased fatigue resistance during the spring 2004 refueling outage. These lines are located close to the high pressure feedwater heaters, which were replaced. In conjunction with the heater replacement, the lines were removed and re-attached with 2-to-1 weld leg configuration socket welds per the guidelines of EPRI Report TR-113890[2], "Vibration Fatigue Tests of Socket Welds," Final Report, dated December 1999.

As-built data and photos were taken during the outage to support evaluation of cantilevered small bore lines (2" diameter and less) with socket-welded connections. This information is used to identify any configuration that should be monitored visually or with a handheld vibration meter. Cantilevered lines that contain large valves or double valves have been identified as candidates for monitoring. These include valves on four feedwater lines, four condensate lines and one heater drain line. If significant increased vibration (based on measured variables or engineering judgment) is observed during EPU power ascension testing, an evaluation will be performed in accordance with the guidance contained in ASME OM-3 and the EPRI Fatigue Management Handbook[3].

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[2] Electric Power Research Institute, Report No. TR-113890, *Vibration Fatigue Tests of Socket Welds*, Final Report, December 1999

[3] Electric Power Research Institute, Report No. TR-104534, *Fatigue Management Handbook*, Volumes 1, 2, and 3, Research Project 3321, Revision 1, December 1994

STEAM DRYER MONITORING

The VYNPS steam dryer will be monitored during EPU power ascension testing to verify acceptable performance. Unacceptable performance is a condition that could challenge dryer structural integrity by generation of loose parts or cracks or tears in the dryer that result in excessive moisture carryover. Monitoring will include collection and evaluation of main steam system data and measuring of main steam moisture carryover.

Steam dryer EPU power ascension testing will include collection of main steam system data, similar to the data collected at CLTP for input to an acoustic analysis. The data consists of dynamic pressure measurements taken from pressure transducers installed on main steam line venturi and reactor vessel reference leg sensing lines. Data were collected at several CLTP power levels (80%, 85%, 90%, 95%, and 100%) and used as input to the baseline VYNPS acoustic loads analysis.

In addition to pressure data, Entergy installed strain gauges on each of the four VYNPS main steam lines, between the RPV nozzles and SRVs. Data were collected simultaneously with the pressure measurements at each CLTP power level.

The acoustic analysis results, supplemented with results from a steam dryer vortex shedding analysis, are being used to develop a plant-specific load definition for input to the GE structural analysis. The strain gauge data are used to corroborate the plant-specific load definition. The comparison of measured plant data against a bounding time-history baseline will provide predictive capabilities toward monitoring dryer structural performance. Details of the acoustic analysis and steam dryer power ascension test acceptance criteria will be discussed with the NRC staff at a meeting scheduled for later this month.

In addition to the collection of pressure and strain gauge data, moisture carryover will be measured at each EPU power ascension test level to obtain data for trending moisture carryover at increased power levels and to enable performance of an evaluation to confirm that no unacceptable dryer failure has occurred. Moisture carryover measurements will be performed in accordance with plant procedures, which will incorporate the Boiling Water Reactor Owners Group (BWROG) moisture carryover and operational response guidance. Baseline moisture carryover data have been collected for the current 100% rated thermal power condition. EPU power ascension testing moisture carryover measurements will be compared to the baseline and an evaluation conducted to determine statistical variance relative to the baseline and power ascension trend. If the evaluation shows that the variance relative to the trend is significant, additional measurements will be taken for condition validation, and an evaluation will be performed to determine the impact of the condition. BWROG operational response guidance, currently under development, will be applied to develop a course of action for an adverse moisture carryover trend.

SYSTEM COMPONENT FIV MONITORING

Monitoring of system components will be performed during VYNPS EPU power ascension testing. Components selected for monitoring are those determined to have FIV vulnerabilities. The basis for selection of potentially FIV-vulnerable components for monitoring includes:

1. Plant-specific operating experience;
2. Industry operating experience;
3. Identification of FIV through plant inspections/walkdowns; and
4. Additional evaluation of components potentially susceptible to FIV at increased system flow.

Plant-Specific Operating Experience Evaluation

In addition to plant-specific walkdowns and the monitoring of structures, systems and components during CLTP conditions and during EPU power ascension, industry events that were attributable to EPU were reviewed. Industry EPU operating experience indicates that power uprate may exacerbate existing FIV vulnerabilities, rather than introduce new ones. In order to identify any existing VYNPS vulnerabilities, a review was conducted of plant maintenance records and corrective action event and condition reports for components with failures or wear degradation attributed to vibration. Interviews were conducted with Entergy system engineers and maintenance personnel at VYNPS to identify component FIV vulnerabilities reflected in periodic corrective maintenance or in the VYNPS Preventive Maintenance (PM) program. The following components with the potential for vibration wear were identified for evaluation, although system and component evaluations would not indicate exacerbation because of EPU:

Reactor Water Cleanup (RWCU) Pump – excessive vibration caused by reduction in system flow to improve thermal efficiency. System flow was subsequently restored to previous rates. This was determined to be a one time event. RWCU will not have increased flow at EPU operating conditions. Therefore, this component has not been selected for FIV monitoring.

Service Water Pressure Indicator – this pressure indicator is attached to an instrument line that experiences some limited steam flashing in the summer due to high service water temperatures. The flashing results in vibration of the pressure indicator. The service water system will not have increased flow at EPU operating conditions and therefore no increase in FIV. Therefore, this component has not been selected for FIV monitoring.

Condensate Minimum Flow Recirculation Valve – this valve is used during low power operation to recirculate condensate flow to the condenser, maintaining minimum condensate system flow rate. The valve experiences cavitation due to the large differential between condensate system operating pressure and condenser pressure (vacuum). The cavitation causes vibration of the valve which results in accelerated wear in the valve and on attached fittings. This valve will not be in service at EPU operating condition. Therefore, this component has not been selected for FIV monitoring.

Based on the plant-specific operating experience, no specific components were identified as being currently vulnerable to FIV at EPU conditions. Therefore, no specific components were selected for FIV monitoring.

Component susceptibility at EPU operating conditions will be monitored on a long-term basis via the VYNPS PM Program. As part of EPU implementation, the VYNPS PM program will be enhanced to address components that show increased wear rates following operation at EPU conditions, compared to pre-EPU wear rates.

Industry Operating Experience Evaluation

Entergy reviewed industry BWR EPU operating experience information pertaining to FIV for applicability to VYNPS and potential vulnerabilities. The BWROG EPU Committee has reviewed the Institute for Nuclear Power Operations (INPO) Power Uprate and Cycle Events database to identify BWR EPU events attributed to FIV. Entergy also reviewed each of these FIV events and dispositioned their applicability to VYNPS. Table 2-1, below, summarizes the disposition results. As a result of the industry EPU FIV operating experience evaluation, Entergy will monitor the following components:

- Main steam safety/relief valves – via accelerometers on main steam piping in the vicinity;
- Main steam low point drain lines – via accelerometers in the vicinity;
- Feedwater heater level control valves – via inspection/walkdowns.

As described in Table 2-1, a Quad Cities 3-stage Target Rock safety/relief valve (SRV) had its as-found pressure setpoint out of specification in 2004. The cause was determined to be pilot valve bellows cap wear resulting from flow induced vibration of the main steam piping. VYNPS has an aggressive SRV inspection and preventive maintenance program, which meets ASME code requirements. VYNPS has eight SRVs; four in service and four being readied for operation during the next cycle. All four SRVs are removed from service at the end of each cycle and shipped to an experienced valve maintenance vendor, with certified Target Rock technicians. All four valves have their as-found pressure settings tested for compliance with VYNPS technical specifications. In accordance with a prescribed schedule, two of the SRVs are disassembled, inspected and rebuilt. All four SRVs have their as-left pressure settings tested. Inspection results, including any abnormal findings such as indications of wear, are documented and reported to Entergy.

Entergy implements an Operating Experience program that reviews industry events and assesses applicability to VYNPS. The VYNPS OE program has been flagging events identified as being caused by power uprate. Applicable events have been, and will continue to be, evaluated for potential vulnerabilities, including FIV.

System/ Component Inspection/Walkdown Evaluation

Entergy has performed rated CLTP baseline inspections/walkdowns of the condensate, feedwater and main steam systems to identify systems and components with elevated vibration and to provide a documented general FIV baseline. The baseline will be used for comparison during EPU power ascension testing to identify components experiencing increased vibration levels. Results of the inspections/walkdowns performed during EPU power ascension testing, along with available vibration measurement data, will be compared to baseline results at pre-EPU rated power conditions. Components identified as having significant increases in FIV will be entered into the VYNPS corrective action program and evaluated for acceptability and additional action.

Component evaluations may also conclude that additional surveillance is necessary or the preventive maintenance of the component should be increased in frequency and/or enhanced.

Additional Evaluations of Components

Additional system component evaluations will be performed prior to EPU implementation to identify and evaluate plant components not currently considered vulnerable to FIV, but which may be susceptible to FIV at EPU operating conditions. The components to be evaluated include in-line thermowells and probes, components directly mounted to piping that will experience higher flow rates at EPU operating conditions (e.g., valves, pumps, instruments) and any instrument lines attached to the mounted component. Industry experience will be applied for identification of specific types of components. Information collected from vibration measurements or inspection/walkdowns will be evaluated to determine whether the component should be monitored (if accessible) during the EPU Power Ascension Testing Program. Identification of components that are degraded or in a nonconforming condition would be entered into the plant's corrective action program for proper evaluation.

Table 2-1 – Applicability of Industry FIV Events to VYNPS

INPO EVENT #	PLANT	EVENT	CAUSE	VYNPS APPLICABILITY
237-031009	DRESDEN 2 October 2003. DRESDEN 3 December 2003.	Feedwater sample probes lost in the Condensate and Feedwater Systems were found during fall and winter 2003 outages. One probe was found to have damaged a FW sparger, another was found in the condensate booster pump casing. NRC IN 2004-06 was written to address. Similar probe failures have occurred at Perry, Braidwood, Browns Ferry and Grand Gulf.	Vibration. Feedwater sample probe design was susceptible to transgranular stress corrosion cracking and fatigue failure from flow induced vibration. FW sample probe failures had occurred prior to EPU at Quad Cities (INPO Event # 254-940909) and Browns Ferry 3 (INPO Event #296-920723).	VYNPS does not have sample probes in the condensate and feedwater systems.
333-030319	FITZPATRICK Weld failure occurred 3/19/03	Socket weld failure on zinc injection skid connected to feedwater line. The failure occurred on an unisolable section of the FW supply line, requiring plant shutdown within 24 hours to repair. Connection isolation valve stem failure had occurred one month prior. Stem failure was not recognized as a precursor	Vibration. Stress was high at the valve-to-pipe joint due to highly rigid piping and high valve mass creating a fixed-end cantilever condition, combined with piping resonant vibration in the FW pump 5X vane pass frequency.	Entergy has identified condensate, feedwater and main steam piping for cantilevered piping configurations potentially susceptible to FIV. If found susceptible, components will be monitored during power ascension testing, with follow-on actions taken as appropriate.
296-030626	BROWNS FERRY 3 Damage was identified 6/26/03 during mid-cycle outage. A similar event occurred at Peach Bottom September 2001.	Steam dryer tie bars degraded. 3 out of 3 tie bars were either deformed or broken. Tie bars were replaced with a new, more robust design.	Vibration. Causes are identified as "to be determined" in the INPO write-up.	In April 2004, the VYNPS steam dryer was inspected and modified to provide substantially increased strength to avoid structural integrity problems.

Table 2-1 – Applicability of Industry FIV Events to VYNPS

INPO EVENT #	PLANT	EVENT	CAUSE	VYNPS APPLICABILITY
265-020711	QUAD CITIES 2 July 11, 2002 outer bank hood cover plate failure, resulting in loose parts. Problem was first noted June 7.	Plant shutdown due to damaged steam dryer. One loose part was found in a main steam flow venturi. Moisture carryover increased to 0.735%, RPV pressure increased 20 psi, "A" water level indicated 4" low.	Vibration. High cycle fatigue from vortex shedding that set up a 180 hertz standing wave, which matched the cover plate natural frequency.	In April 2004, the VYNPS steam dryer was inspected and modified to provide substantially increased strength to avoid structural integrity problems.
265-030611	QUAD CITIES 2 May 2, 2003 four-fold increase in moisture carryover, exceeding the limit on May 28. Unit shutdown June 11.	Steam dryer damaged. Outer hood horizontal plate and vertical hood plate had 90" long through-wall crack, up to 3" wide. Three internal braces were detached.	Vibration. Internal brace design concentrated hood plate stress. QC has 20" MSLs and the highest steam velocities in the BWR fleet at EPU, creating flow induced and acoustic loads on the dryer, leading to high cycle fatigue.	In April 2004, VY inspected and modified its steam dryer to provide substantially increased strength to avoid structural integrity problems.
352-000402	LIMERICK	Broken extraction steam line plate leads to tube failures in FW heater	Vibration. Failure of the plate was due to a weld seam design flaw and poor quality welds, combined with increased extraction steam flow induced vibration.	The four VYNPS high pressure feedwater heaters were replaced during the spring 2004 refueling outage with higher capacity heaters designed to provide adequate EPU operating margin. Design of the new VYNPS FW heaters took into account higher EPU extraction steam flow rates and provide adequate design margin.
374-020422	LASALLE	Multiple FW heater tube leaks	Vibration. Failure of the tubes was attributed to marginal heater design and excessive shell side velocity as a result of a stretch power uprate.	The four VYNPS high pressure feedwater heaters were replaced in spring 2004 with higher capacity heaters designed to provide adequate EPU operating margin. Design of the new VY FW heaters took into account higher EPU extraction steam flow rates and provided adequate design margin.

Table 2-1 – Applicability of Industry FIV Events to VYNPS

INPO EVENT #	PLANT	EVENT	CAUSE	VYNPS APPLICABILITY
333-981028	FITZPATRICK	Degraded FW heater system level control valves	Vibration. FW heater level control valves experienced positioner failures and were found to have vibration induced failures including broken air lines, valve yokes and valve internal welds.	Entergy evaluated VY FW heater level control valve vibration susceptibility. As a result, nine level control AOVs were modified by replacing the air supply rigid tubing with flex hose. FW heater level control valves will be monitored for vibration during EPU power ascension testing.
341-931226	FERMI 2	Failure of Reactor Recirc Pump "B" discharge valve to close.	Vibration. Recirculation pump operating speed created a vibration harmonic coincident with the discharge valve yoke and control wire bundle natural frequency. This resulted in a fatigue failure of some valve limit switch wires.	Recirculation pump speeds will not increase beyond the currently evaluated speed as a result of EPU.
265-020402	QUAD CITIES 2	Main Steam piping low point drain line failed due to vibration related to EPU	Vibration. Increased steam flow and change in turbine control valve position resulted in higher FIV. The drain line had been modified three weeks prior (during an outage) by removing supports. The plant EPU monitoring program did not include this drain line.	The VYNPS main steam piping low point drain has been evaluated and determined by GE to be satisfactory for EPU Step 1 (115%). During the spring 2004 refueling outage, non-destructive examination (NDE) of the low point MS drain line socket weld connection to the MS line showed no evidence of fatigue related indications. The line will be monitored for FIV during EPU power ascension testing. The line will be modified (strengthened) prior to EPU Step 2 (120%), if required.

Table 2-1 – Applicability of Industry FIV Events to VYNPS

INPO EVENT #	PLANT	EVENT	CAUSE	VYNPS APPLICABILITY
INPO Event Number Not Yet Assigned	QUAD CITIES 2	SRV as-found pressure setpoint exceeded Tech Spec allowed value and ASME Code requirements.	Vibration. FIV caused bellows cap material grooving. This resulted in spring interference requiring additional force to actuate the SRV.	VYNPS has 3-stage Target Rock SRVs. These have been identified as potentially susceptible to FIV. Piping in the vicinity of the SRVs will be monitored for FIV during power ascension testing.
388-940621	SUSQUEHANNA 2	Recirc Pump vibration following stretch uprate implementation (GE SIL 600)	Vibration. Increase in recirculation pump flow for a stretch uprate resulted in increased noise and vibration as identified in GE SIL 600.	VYNPS is currently licensed for ICF up to 107% of rated core flow. Recirculation pump speeds will not increase beyond the currently evaluated speed as a result of EPU.
999-020821	QUAD CITIES 2	Steam Dryer failure	Vibration. Dryer cover plate failed generating a loose part that became lodged in a main steam line flow venturi.	In April 2004, the VYNPS steam dryer was inspected and its cover plates modified to provide substantially increased strength to avoid structural integrity problems.
265-020329	QUAD CITIES 2	Turbine Control Valve EHC accumulator leaks caused unplanned shutdown	Vibration. Leaks in the turbine control valve EHC accumulator were caused by fatigue failure resulting from high frequency FIV of the accumulator assemblies. The design was inadequate for handling the higher vibration experienced at EPU operating conditions.	VYNPS does not have EHC accumulators that could experience FIV and fatigue. The VYNPS turbine control system is a mechanical hydraulic control (MHC) design.

Attachment 2

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 263 – Supplement No. 15

Extended Power Uprate

Response to Steam Dryer Action Item No. 2

Regulatory Commitments

Total number of pages in Attachment 2 (excluding this cover sheet) is 1.

Licensee Identified Commitment Form

This form identifies actions discussed in this letter for which Entergy Nuclear Operations, Inc. (Entergy) commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are not commitments.

(BVY 04-100)

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	One-Time Action	Continuing Compliance	
Implement flow induced vibration and steam dryer monitoring, including associated evaluation as necessary during EPU power ascension testing as described in Entergy letter BVY 04-100.	X		**During EPU power ascension testing. (The specific date is indeterminate.)**
Discuss details of the acoustic analysis and steam dryer power ascension test acceptance criteria at a meeting with NRC staff.	X		**September 30, 2004**
Implement BWROG operational (moisture carryover) response guidance.	X		**During EPU power ascension testing. (The specific date is indeterminate.)**