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STATE OF VERMONT
DEPARTMENT OF PUBLIC SERVICE

September 24, 2004

Mr. Jay K. Thayer
Site Vice President
Entergy Nuclear Vermont Yankee
P.O. Box 0500
185 Old Ferry Road
Brattleboro, VT 05302-0500

RE: Information for Presentation to ACRS

Dear Mr. Thayer:

Pursuant to 30 V.S.A. § 206, this letter requests that information be provided to the Department. The documents and information are needed by the Department to prepare a presentation to the Advisory Committee on Reactor Safeguards (ACRS) regarding Entergy's request for extended power uprate.

On September 17, 2004, as part of our ongoing responsibilities related to oversight of Vermont Yankee, we asked the ACRS to allow us to make a presentation on Entergy's request to change Vermont Yankee's design basis to take credit for containment overpressure to demonstrate the adequacy of emergency core and containment cooling pumps. In order to properly make this presentation, we need a number of Vermont Yankee documents and related information. Although we believe that Nuclear Regulatory Commission (NRC) power uprate review staff should also review this information as part of their review, we are not aware that you have provided this information to the NRC review staff. Therefore, these documents are not in our possession.

1. Please provide us with a copy of the following documents. When calculations are requested, the request includes the latest revision and all applicable calculation change notices (CCN's).

VYC-1924: DE&S Calc. DC-A34600-006. Vermont Yankee ECCS Suction Strainer Head Loss Performance Assessment, RHR and CS Debris Head Loss Calculations

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VYC-1677: Debris Source Terms for Sizing of Replacement Residual Heat Removal and Core Spray Strainers

VYC-1919: DE&S Calc. DC-A34600-01. RHR and CS Suction Strainer Assembly Clean Strainer Head Loss

ARL 65-98/M208F, Head Loss of Fibrous Insulation Debris, Paint Chips, Sludge and Turbulence Effects for Vermont Yankee BWR Suction Strainers, April 1998 (Johnson & Padmanabhan) (VYC-1959?)

ITS/VY-98-01, Rev. 1, Analysis of Tests for Investigating the Effect of Coating Debris on ECCS Strainer Performance for Vermont Yankee, August 1998 (Copus) (VYC-1960?)

GE-VYNPS-AEP-177: VYNPS EPU T0400: Suppression Pool Temperature/Pressure Response to DBA-LOCA (4/5/03)

GE-NE-0000-0016-3831-01: VYNPS EPU Task T0902: Anticipated Transients Without Scram

ERC No. 2003-027 Debris Source Term Appropriate for Power Uprate Evaluations of ECCS NPSH (5/13/03)

GE/CDI Technical Memorandum 97-10, July 2, 1997 (basis for Vermont Yankee paint quantities)

KTA-Tator Test Report, June 25, 1998, Containment Coating

Calculation(s) to determine Torus Temperature and NPSH for RHR and CS pumps on for a Stuck Open Safety/Relief Valve.

- 2. Please identify whether it is feasible to replace RHR and CS spray pumps with pumps which do not require crediting containment overpressure for NPSH adequacy. If you have determined that such replacement is not feasible, please identify the reasons for such a determination.
- 3. Please identify the highest uprated power level possible for Vermont Yankee for which Vermont Yankee would not have to request changing its design basis to take credit for containment overpressure to demonstrate NPSH adequacy for any of the events: large and small break LOCAs, SBO, ATWS, Appendix R fires, and

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stuck open SRVs. Please provide copies of the calculations you have used to determine this highest uprated power level without taking overpressure credit.

In addition, if Entergy intends at ACRS to support its overpressure credit design basis change request with risk and probabilistic information, we would request to meet with you to discuss your probabilistic modeling and assumptions related to containment overpressure credit.

In order to prepare for the ACRS meeting, the information above is requested by October 15, 2004.

Sincerely,

David O'Brien, Commissioner NRC State Liaison Officer

cc:

M. Bonaca - ACRS

P. Lohaus - NRC

R. Ennis - NRC

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Mr. Paul Lohaus Director of State and Tribal Programs U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

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