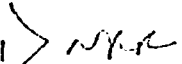


From: Rick Ennis
To: Richard Lobel 
Date: 3/24/04 12:14PM
Subject: Yellow Ticket - Response to Vermont

Rich,

In reviewing the SPSB comments to the Yellow Ticket response to Vermont, page 6 of the letter has the following paragraph:

The NRC staff has also considered the impact of credit for containment accident pressure for so-called beyond-DBAs during which the ECCS or the containment heat removal system may be called upon to function. For station blackout, anticipated transients without scram and Appendix R postulated fires, the suppression pool conditions are less severe than those for the design-basis LOCA. Credit for containment accident pressure is not needed for shutdown conditions. For these postulated events, no debris would be generated and, therefore, the flow losses are considerably lower for these events than for the design-basis LOCA and the available NPSH consequently greater. As a result, credit for containment accident pressure is not needed.

Several questions:

- 1) Is "shutdown conditions" one of the "events" we are talking about in 2nd to last sentence? If not, shouldn't the sentence "Credit for containment accident pressure is not needed for shutdown conditions." be moved to the end of the paragraph and be revised to state: "Credit for containment accident pressure is also not needed for shutdown conditions."
- 2) Vermont Yankee's submittal dated 9/10/03 on page 2 of the cover letter states they are requesting the containment overpressure credit for LOCA, station blackout, and Appendix R fire events which is contrary to the above paragraph (see bottom of page 2 of 38 of first file attached). However, review of Attachment 4 of the submittal, Section 4.2.6, makes it appear that they are only requesting the credit for LOCA (see page 101-103 of 214 of second file attached). Let's discuss.

Thanks,

Rick

B/8