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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: **Vermont Yankee Nuclear Power Station**
Technical Specification Proposed Change No. 263 – Supplement No. 21
Extended Power Uprate – Steam Dryer Power Ascension Testing

Reference:
1) Entergy letter to U.S. Nuclear Regulatory Commission, "Vermont Yankee Nuclear Power Station, Technical Specification Proposed Change No. 263, Extended Power Uprate," BVY 03-80, September 10, 2003
2) Entergy letter to U.S. Nuclear Regulatory Commission, "Vermont Yankee Nuclear Power Station, Technical Specification Proposed Change No. 263 – Supplement No. 20, Extended Power Uprate – Meeting on Steam Dryer Analysis," BVY 04-113, October 7, 2004

This letter provides additional information in support of the application (Reference 1) 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.

In response to discussions with the NRC staff, this letter provides a proposed license condition and associated steam dryer power ascension testing plan (SDPATP) that would be implemented during initial power ascension under extended power uprate (EPU) conditions.

Reference 1 identified the steam dryer as a non-safety-related component being affected by increased steam flow under EPU conditions. Industry operating experience over the last two years has resulted in increased attention toward ensuring the structural integrity of this component under power uprate conditions. A number of supplements to the EPU license amendment application provide additional information regarding steam dryer structural evaluations. In addition, during the refueling outage earlier this year, a thorough inspection was conducted of the dryer, and structural modifications were made to enhance its integrity. Analyses of steam dryer integrity under EPU conditions are continuing. These analyses will provide reasonable assurance that the dryer will adequately maintain its structural integrity under EPU conditions.

In this regard, preliminary analyses of steam dryer loads were presented to the NRC staff during a meeting held on September 29, 2004. Information presented in that meeting was submitted to the NRC by Reference 2. Based on structural modifications that were made to the steam dryer during the recent refueling outage, the main steam data collected during the subsequent startup, and preliminary analyses, Entergy is confident that steam dryer integrity will be

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maintained under EPU conditions. As discussed in the September 29, 2004, meeting, the structural analyses are not complete. There are several elements to the remaining analyses, including benchmarking the acoustic model in the scale model test facility, completion of the computational fluid dynamics analysis, and structural assessment of the modified VYNPS dryer with a transient finite element analysis. The validation of analytical methodologies is being coordinated within the industry and involves several utilities, owners groups, and contractors. The application of this broad spectrum of industry expertise will fortify the analytical methodology. Because some aspects of the overall steam dryer analytical plan are iterative and being revised, some details of the plan have not yet been finalized. The proposed SDPATP provided herewith is predicated on a steam dryer analysis methodology approach which may change subsequent to this submittal. Such changes could affect the SDPATP.

By January 31, 2005, Entergy will submit to the NRC staff a description of the approach to be followed in resolving issues concerning steam dryer analytical techniques. The analytical results are scheduled to be completed soon thereafter and will be provided to the NRC staff by February 15, 2005.

An important element in verifying steam dryer integrity and mitigating the effects of unacceptable steam dryer performance during reactor operation is the SDPATP, which is provided as Attachment 1. The SDPATP is a component of the overall Power Ascension Test Plan (PATP) for EPU and is applicable during initial power operation above 100% original licensed thermal power (OLTP), i.e., 1593 MWt, and may be terminated upon demonstration of acceptable dryer performance at 120% OLTP. EPU power ascension will be achieved in two steps at VYNPS:

- Step 1 (scheduled to begin shortly after receipt of the EPU-amended operating license) will increase power from 100% to approximately 115% OLTP. VYNPS will not exceed 630 MWe gross during the current operating cycle (i.e., Cycle 24).

- Step 2 will increase power to 120% of OLTP in accordance with the approved license amendment. This second step in power ascension will begin following the next refueling outage, currently scheduled for the 4th quarter of 2005.

The SDPATP applies to both Step 1 and Step 2. Components of this plan will be implemented before EPU power ascension testing, and others may continue after power ascension testing.

Entergy will accept a license condition for VYNPS that applies the SDPATP criteria in Attachment 1. Attachment 2 is the proposed license condition. In order to discuss details of the SDPATP in greater depth, as well as future steam dryer activities, Entergy requests a meeting with the NRC staff at your earliest convenience.

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.

No new regulatory commitments are made in this submittal. The actions proposed herein will become regulatory commitments or obligations upon acceptance by the NRC staff.

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

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

Executed on December 9, 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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Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 263 – Supplement No. 21

Extended Power Uprate – Steam Dryer Power Ascension Testing

Steam Dryer Power Ascension Test Plan

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

VERMONT YANKEE NUCLEAR POWER STATION
STEAM DRYER POWER ASCENSION TEST PLAN

Introduction and Purpose

This plan describes the course of action for monitoring and evaluating the performance of the Vermont Yankee Nuclear Power Station (VYNPS) steam dryer during power ascension testing above 100% of the original licensed thermal power (OLTP), i.e., 1593 MWt, to the full 120% extended power uprate (EPU) condition of 1912 MWt to verify acceptable performance. Unacceptable dryer performance is a condition that could challenge steam dryer structural integrity and result in the generation of loose parts or cracks or tears in the dryer that result in excessive moisture carryover. The comparison of measured plant data against defined criteria, based on the dryer structural analysis of record, will provide predictive capabilities toward determining steam dryer structural integrity under EPU conditions.

Scope

The steam dryer power ascension test plan (SDPATP) is a component of the overall PATP for EPU and is applicable during initial power operation above 100% OLTP and may be terminated upon demonstration of acceptable steam dryer performance at 120% OLTP (i.e., 1912 MWt) following collection and evaluation of data. EPU power ascension will be achieved in two steps:

- Step 1 (scheduled to begin shortly after receipt of the EPU-amended operating license) will increase power from 100% to approximately 115% OLTP. VYNPS will not exceed 630 MWe gross during the current operating cycle (i.e., Cycle 24).
- Step 2 will increase power to 120% OLTP in accordance with the approved license amendment. This second step in power ascension will begin following the next refueling outage, currently scheduled for the 4th quarter of 2005.
- The SDPATP dryer monitoring approach applies to both Step 1 and Step 2. Elements of this plan will be implemented before EPU power ascension testing, and others may continue after power ascension testing.

Operating Specifications

When initially operating above 1593 MWt, the parameters identified in Table 1 that are indicative of steam dryer integrity shall be monitored at the frequencies specified and shall meet applicable acceptance criteria as described in this plan. Any change to the following test criteria, required actions, or surveillance requirements can only be made in accordance with the steam dryer license condition.

Initial EPU power ascension testing above 100% OLTP will be conducted in 2.5% OLTP steps and 5% OLTP plateaus. The initial power ascension will include a 4-hour hold at each 2.5% step and a 168-hour hold at each 5% plateau.

Tables 2 and 3 establish the criteria for verifying acceptable steam dryer performance based on moisture carryover and main steam line pressure data, respectively. If the

basic acceptance criteria (i.e., Level 4 criteria in Tables 2 and 3) are not met, the actions and completion times specified shall be met for the given condition. Otherwise, the basic acceptance criteria in Table 2 and Table 3 are associated with fully acceptable steam dryer performance.

Additionally, if the basic acceptance criteria in Tables 2 and 3 are not met, the following actions will be taken:

1. Promptly suspend reactor power ascension, initiate a Condition Report, and evaluate the cause of any exceedance of the basic acceptance criteria.
2. Prior to increasing reactor thermal power to a level higher than any previously attained, the plant conditions relevant to steam dryer integrity and associated evaluation results shall be reviewed by the on-site review committee, and a recommendation shall be made to the General Manager, Plant Operations prior to increasing power for each 5% power plateau.
3. Each initial increase in reactor thermal power to the next higher 5% power plateau above 100% OLTP must be authorized by the General Manager, Plant Operations.

Table 1
Steam Dryer Surveillance Requirements

Parameter	Surveillance Frequency
1. Moisture Carryover	Every 24 hours (Notes 1 and 2)
2. Main steam line pressure data from strain gauges	Hourly when initially increasing power above 100% OLTP. AND At least once at every 2.5% (nominal) power step above 100% OLTP. (Note 3)
3. Main steam line pressure data from pressure transducers	At least once at every 2.5% (nominal) power step above 100% OLTP. (Note 4)
4. In addition to the above, selected plant parameters shall be monitored with the intent of detecting structural degradation of the steam dryer during plant operation (e.g., flow distribution between individual main steam lines).	Every 12 hours (Note 5)

Notes to Table 1:

1. If a determination of moisture carryover cannot be made within 24 hours of achieving a power plateau, an orderly power reduction shall made within the subsequent 12 hours to a power level at which moisture carryover was previously determined to be acceptable. For testing purposes, a power ascension step is defined as each power increment of 2.5% over OLTP, i.e., at thermal power levels of approximately 102.5%, 105%, 107.5%, 110%, 112.5%, 115%, 117.5%, and 120% OLTP. Power level plateaus are nominally every 5% of OLTP greater than 100%.

2. Provided that the basic acceptance (i.e., Level 4) criterion in Table 2 is met, when steady state operation at a given power exceeds seven (7) consecutive days, moisture carryover monitoring frequency may be reduced to once per week.

3. The surveillance shall be performed hourly when increasing power above a level at which data was previously obtained. The surveillance is also required to be performed once at each 2.5% power step above 100% OLTP, but within one hour of achieving each 2.5% step in power, i.e., at thermal power levels of

approximately 102.5%, 105%, 107.5%, 110%, 112.5%, 115%, 117.5%, and 120% OLTP. If the surveillance is met at a given power level, additional surveillances do not need to be performed during steady state power operation or upon returning to a power level where data had previously been obtained.

If valid strain data cannot be recorded hourly or within one hour of reaching a 2.5% power step from at least three of the four main steam lines, an orderly power reduction shall be made to a lower power level at which data had previously been obtained. Any such power level reduction shall be met within the subsequent two hours.

4. The surveillance is only required to be performed once at each 2.5% power step above 100% OLTP, i.e., at thermal power levels of approximately 102.5%, 105%, 107.5%, 110%, 112.5%, 115%, 117.5%, and 120% OLTP. If the surveillance is met at a given power level, additional surveillances do not need to be performed during continued steady state power operation or upon returning to a power level where data had previously been obtained.

   If valid pressure data cannot be recorded within one hour of reaching a 2.5% power step from at least three of the four main steam lines, an orderly power reduction shall be made to a lower power level at which data had previously been obtained. Any such power level reduction shall be met within the subsequent two hours.

5. The enhanced monitoring of selected plant parameters will be controlled by plant procedures.

Table 2
Moisture Carryover Criteria

Acceptance Criteria	Required Action and Completion Time
Level 4 (basic acceptance criterion) Moisture Carryover ≤ 0.1% (Note 1)	None
Level 3 Moisture Carryover > 0.1% and ≤ 0.2% (Notes 1 and 2)	1. Promptly suspend reactor power ascension until an evaluation concludes that further power ascension is justified, and re-measure moisture carryover within 12 hours. 2. Perform an engineering evaluation of the condition within 12 hours. If within 12 hours, an evaluation is not performed, or it cannot be concluded that the current power level is justified, power shall be reduced to a previous acceptable level.
Level 2 Moisture Carryover > 0.2% and ≤ 0.35% (Notes 1 and 2)	1. Promptly initiate a reactor power reduction and achieve a previously acceptable power level within two hours, unless an evaluation concludes that power ascension or the current power level is acceptable, and re-measure moisture carryover within 12 hours. 2. Reduce further power ascension step and plateau levels to nominal increases of 1.25% and 2.5% of OLTP, respectively, for any additional power ascension.
Level 1 Moisture Carryover ≤ 0.35% (Note 1)	If the Level 1 criterion is not met: 1. Promptly initiate a reactor power reduction and achieve a previously acceptable power level within two hours. 2. Within 24 hours, perform an engineering evaluation of steam dryer structural integrity. If the results of the evaluation of structural integrity do not support continued plant operation, place the reactor in a hot shutdown condition within the following 24 hours.

Notes to Table 2:

1. Except for Level 1, the moisture carryover action criteria may be changed based on an engineering evaluation, e.g., an evaluation prepared in support of MELLLA+.
2. Plant operations, including other power ascension testing may be conducted during conditions in which Level 4, 3 and Level 2 criteria are exceeded.

Table 3
Main Steam Line Pressure Data Criteria

Acceptance Criteria	Required Action and Completion Time
Level 4 (basic acceptance criterion) All pressure data from the available main steam line strain gauges less than the EPU Level B Spectra (Note 1)	None
Level 3 Pressure data from one or more of the available main steam line strain gauges greater than the EPU Level B Spectra, but all available data less than the EPU Level A Spectra (Note 2)	1. Promptly suspend reactor power ascension until an evaluation concludes that further power ascension is justified. 2. Before resuming reactor power ascension, the pressure data shall be reviewed as part of an engineering evaluation to assess whether further power ascension can be made without exceeding the Level A Spectra. (Note 3)
Level 2 Pressure data from one or more of the available main steam line strain gauges greater than the EPU Level A Spectra.	1. Promptly initiate a reactor power reduction and achieve a previously acceptable power level within two hours, unless an evaluation concludes that power ascension or the current power level is acceptable. 2. Within 24 hours, perform an evaluation of steam dryer structural integrity. If the results of the evaluation of dryer structural integrity do not support continued plant operation, place the reactor in a hot shutdown condition within the following 24 hours. If the results of the evaluation support continued power operation, implement steps 3 and 4 below. 3. Reduce further power ascension step and plateau levels to nominal increases of 1.25% and 2.5% of OLTP, respectively, for any additional power ascension. 4. Within 30 days, the transient pressure data shall be used to calculate the dryer fatigue usage to demonstrate that continued power operation is acceptable. (Note 3)

Table 3
Main Steam Line Pressure Data Criteria

Acceptance Criteria	Required Action and Completion Time
Level 1 Steam dryer fatigue usage factor $\leq$ 1	If the results of an engineering evaluation of dryer structural integrity does not meet the Level 1 criterion, the reactor shall be placed in a hot shutdown condition within 24 hours.

Notes to Table 3:

1. The EPU spectra shall be determined and documented in an engineering calculation. Acceptable Level B Spectra shall be based on maintaining 80% of the ASME allowable alternating stress (S_a) value at 10^{11} cycles (i.e., 10.88 ksi). Acceptable Level A Spectra shall be based on maintaining the ASME S_a at 10^{11} cycles (i.e., 13.6 ksi).
2. Plant operations, including other power ascension testing may be conducted during conditions in which Level 3 criteria are exceeded.
3. Transient pressure data shall be recorded and analyzed to assess the dryer fatigue margin to the ASME fatigue stress limit. Revised EPU Level B Spectra and Level A Spectra may be developed based on OLTP and EPU data. If the analysis indicates that the dryer stress exceeded 13.6 ksi, a fatigue usage and structural integrity assessment of the dryer shall be made.

Methodology and Basis

Entergy is developing a plant-specific dryer load definition for use in the VYNPS steam dryer structural analysis. Entergy intends to submit the analysis to the NRC upon its completion.

Entergy will use baseline pressure data from main steam system strain and pressure instruments collected at 80% to 100% OLTP conditions to develop OLTP pressure loads on the dryer face through acoustic and computational fluid dynamic (CFD) models. The modified VYNPS dryer will be analyzed using time history finite element analysis (FEA) to assess dryer stresses and fatigue margin. The pressure data will be converted to frequency domain pressure spectra. Based on the fatigue margin calculated with the finite element model under OLTP conditions, Entergy will develop spectra appropriately extrapolated from the OLTP spectra to maintain ASME OM-S/G-2000[1] fatigue stress limits (S_a = 0.8 x 13.6 ksi = 10.88 ksi). The EPU Level B Spectra will serve as the Action Level 4 criteria for dryer monitoring during power ascension testing.

In addition, Entergy will develop Level A Spectra. The Level A Spectra will be developed by appropriately extrapolating from the OLTP spectra to maintain ASME III Appendix I

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

Curve C fatigue stress limits (S_a = 13.6 ksi). Under the conservative ASME rules this would provide for 10^{11} allowable design cycles. Assuming the peak stress in the dryer continuously cycled at 200 Hz (very improbable), it would require 16 years of continuous cycling to reach 10^{11} cycles.

Entergy will monitor pressure data hourly during initial power ascension and within the first hour of achieving each 2.5% power step.

Based on other BWR EPU power ascension data, it is likely that any challenges to the Level B and Level A Spectra will occur at isolated frequencies. If the measured data exceed the Level A Spectra, VYNPS will suspend power ascension and reduce power within two hours to a power level where pressure data are less than the EPU Level A Spectra.

In the event the EPU Level A Spectra are exceeded, Entergy will perform a revised dynamic time history analysis with new plant data. Based on the revised analyses, new Level B (S_a = 10.88 ksi) and Level A (S_a = 13.6 ksi) Spectra may be developed, tailored to the VYNPS pressure signature observed under EPU conditions. Entergy will assess the impact on dryer fatigue life for any data that exceed the Level A Spectra.

Entergy will measure moisture carryover in accordance with SIL 644[2] as an indicator of dryer structural integrity to verify its acceptable performance. Acceptance criteria based on plant operational history are defined below.

Data Collection

During initial EPU power ascension, plant data will be measured and recorded, as a minimum, at power steps corresponding to approximately 102.5%, 105%, 107.5%, 110%, 112.5%, 115%, 117.5%, and 120% OLTP. In addition, Entergy will monitor pressure data from the main steam strain gauges hourly during initial power ascension. The plant will be held at each 5% power plateau for a minimum of seven consecutive days to allow sufficient time to evaluate test results. Depending upon actual performance, smaller power increase increments may be used. Data collected will consist of:

- Dynamic pressure measurements taken from four pressure transducers installed on transmitters associated with each main steam line venturi.

- Measurements taken from strain gauges located on each of the four main steam lines between the reactor pressure vessel nozzles and the closest inboard safety/safety relief valve.

- Moisture carryover measurements will be made during power ascension testing above 100% OLTP in accordance with SIL 644.

[2] GE Nuclear Energy, Services Information Letter, SIL No. 644, Revision 1, "BWR Steam Dryer Integrity," November 9, 2004

- Plant data that may be indicative of off-normal dryer performance will be monitored during power ascension (e.g., level, steam flow, feed flow, etc.). Plant data can provide an early indication of unacceptable dryer performance.

Input Data

The acoustic analysis is being used to generate acoustic forces for the structural model. The acoustic loads are based on a detailed model of the VYNPS dryer, steam dome, steam piping and instrument lines. The input for this analysis consists of temporal plant pressure data including data derived from strain gauges on each of the four steam lines upstream of the flow venturi, and data from four high speed pressure transducers installed on the main steam flow venturi instrument lines. Entergy has collected and processed data through two power ascensions (80 to 100% OLTP) and three times at full power.

Plant data indicate that pressure forces increase with power. The frequency content of the pressure loads does not vary substantially from 80 to 100% OLTP. Selection of the transient data will include acoustic analysis from 80 to 100% OLTP to assess the load magnitude on the dryer. The transient data for the OLTP baseline case will be selected to maximize dryer loading. The frequency spectra from this OLTP baseline case will also be compared to data from subsequent tests to ensure the baseline case is representative of typical conditions.

Structural Model

The structural model of the VYNPS dryer consists of a detailed three dimensional finite element model. The ANSYS program is being used for the analysis. The model is of sufficient detail to simulate structure response over a range of frequencies. Peak stresses at local discontinuities are being addressed separately in post-processing. The loads are being applied as time-varying pressure forces. These loads are calculated with acoustic and CFD fluid models and include asymmetric loads throughout the dryer structure.

Fatigue Stress Limits

The VYNPS dryer will be analyzed using time history finite element analysis (FEA) to assess dryer stress and fatigue margin. Based on the fatigue margin calculated with the finite element model under OLTP conditions, Entergy will develop spectra appropriately extrapolated from the OLTP spectra to maintain OM fatigue stress limits (S_a = 0.8 x 13.6 ksi = 10.88 ksi). This will serve as a Level 4 criterion for dryer monitoring during power ascension testing. The Level A Spectra will be developed by appropriately extrapolating from the OLTP spectra to maintain ASME III, Appendix I, Curve C fatigue stress limits (S_a = 13.6 ksi).

Evaluations

Data collected at each power ascension step will be evaluated relative to the acceptance criteria.

If the basic acceptance criteria are not met, the plant conditions relevant to steam dryer integrity and the associated evaluation results shall be reviewed by the on-site review committee at every 5% power plateau and prior to increasing power. Permission to ascend in power will be granted by the General Manager, Plant Operations.

Reporting to NRC

1. Steam Dryer Visual Inspections: The results of the visual inspections of the steam dryer conducted during the next three refueling outages (beginning with the 2005 refueling outage) shall be reported to the NRC staff within 60 days following startup from the respective refueling outage.

2. SDPATP: The results of the SDPATP shall be submitted to the NRC staff in a report within 60 days following the completion of all EPU power ascension testing. Contemporary data and results from dryer monitoring will be available on-site for review by NRC inspectors as it becomes available. The written report on steam dryer performance during EPU power ascension testing will include evaluations or corrective actions that were required to obtain satisfactory dryer performance. The report will include relevant data collected at each power step, comparisons to acceptance criteria (design predictions), and evaluations performed in conjunction with dryer integrity monitoring.

Long Term Actions

The VYNPS steam dryer will be inspected during the refueling outages scheduled for the Fall 2005, Spring 2007, and Fall 2008. The inspection will be comparable to the inspection conducted during the Spring 2004 refueling outage.

Following completion of power ascension testing, moisture carryover measurements will continue to be made periodically in accordance with GE SIL 644 and plant procedures.

Equipment associated with temporarily installed pressure monitoring sensors and strain gauges may be removed from service following the achievement of full EPU.

Attachment 2

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 263 – Supplement No. 21

Extended Power Uprate – Steam Dryer Power Ascension Testing

Proposed License Condition

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

LICENSE CONDITION:

1. When operating above 1593 MWt (i.e., at extended power uprate conditions), the operating limits, required actions, and surveillance frequencies specified in the Steam Dryer Power Ascension Test Plan (SDPATP) shall be met. The following key attributes of the SDPATP shall not be made less restrictive without prior NRC approval:

   a. For the purpose of steam dryer performance monitoring during power ascension testing, each test plateau increment shall be limited to $\leq$ 5% OLTP;
   b. Level 1 acceptance criteria

   Changes to other aspects of the SDPATP may be made in accordance with the guidance of NEI 99-04[1].

2. During each of the next three refueling outages (beginning with the 2005 refueling outage), a visual inspection shall be conducted of all accessible, susceptible locations of the steam dryer, including flaws left "as-is" and modifications.

3. The results of the visual inspections of the steam dryer conducted during the next three refueling outages (beginning with the 2005 refueling outage) shall be reported to the NRC staff within 60 days following startup from the respective refueling outage. The results of the SDPATP shall be submitted to the NRC staff in a report within 60 days following the completion of all EPU power ascension testing.

[1] Nuclear Energy Institute, "Guidelines for Managing NRC Commitment Changes," NEI 99-04, Revision 0, July 1999