March 28, 2005

MEMORANDUM TO: Darrell J. Roberts, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager, Section 2 ***/RA/***
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION, DRAFT REQUEST FOR ADDITIONAL INFORMATION (TAC NO. MC4662)

The attached draft request for information (RAI) was transmitted on March 28, 2005, 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 amendment request for Vermont Yankee Nuclear Power Station dated October 5, 2004. The proposed amendment would revise Technical Specification Section 6.7.C "Primary Containment Leak Rate Testing Program," to allow a one-time extension to the ten-year interval for performing the next Type A containment integrated leak rate test (ILRT). Specifically, the change would allow the test to be performed within fifteen years from the last ILRT, which was performed in April 1995.

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

ONE-TIME INTEGRATED LEAK RATE TEST INTERVAL EXTENSION
AMENDMENT REQUEST

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

By letter dated October 5, 2004, Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (Entergy or the licensee) submitted an amendment request for Vermont Yankee Nuclear Power Station (VYNPS). The proposed amendment would revise Technical Specification Section 6.7.C "Primary Containment Leak Rate Testing Program," to allow a one-time extension to the ten-year interval for performing the next Type A containment integrated leak rate test (ILRT). Specifically, the change would allow the test to be performed within fifteen years from the last ILRT, which was performed in April 1995.

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

1. The licensee's discussion of the Inservice Inspection (ISI) Program on page 5 of Attachment 1 of the application indicates that, based on the 1998 Edition of ASME Section XI through the 2000 Addenda, VYNPS performs Category E-A examinations (General Visual Examinations) in accordance with Table IWE-2500-1. These general visual examinations cover the interior and exterior pressure retaining boundary (Item E1.10), accessible surface areas (Item E1.11), and moisture barriers (Item E1.30). Provide a detailed description of the acceptance criteria used for visual examination of containment surfaces and how these general visual examinations are performed.

2. For the examination of penetration seals and gaskets, and examination and testing of bolted connections associated with the primary containment pressure boundary (Examination Categories E-D and E-G), relief for the requirements of the Code had been requested by some nuclear plant licensees. As an alternative, these licensees proposed to examine the containment components during the leak-rate testing of the primary containment. Since the application states that there are no Relief Requests in effect for the containment ISI program, the staff request the licensee to provide a detailed description of how the above items are examined, including the schedule for examinations.

3. NRC Information Notice 92-20, "Inadequate Local Leak Rate Testing," was issued to alert licensees of problems with local leak rate testing of two-ply stainless steel bellows used on piping penetrations at some plants. Specifically, local leak rate testing could not be relied upon to accurately measure the leakage rate that would occur under accident conditions since, during testing, the two plies in the bellows were in contact with each other, restricting the flow of the test medium to the crack locations. Any two-ply bellows of similar construction may be susceptible to this problem. Please discuss the applicability of this issue to VYNPS, and if applicable, provide information regarding inspection and testing of the bellows, and how such behavior has been factored into the risk assessment submitted in support of this license amendment request.