



August 1, 2005
BVY 05-071

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

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Clarifications to Relief Request RI-01 Table**

By letter dated October 1, 2003¹, as supplemented by letters dated December 23, 2003², January 22, 2004³ and June 8, 2005⁴, Vermont Yankee Nuclear Power Station (VY) submitted Relief Request RI-01. Relief Request RI-01 proposed to use various Boiling Water Reactor Vessel Internals Program guidelines as an alternative to certain requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for Inservice Inspection of Reactor Pressure Vessel internal components.

Following discussion with your staff, VY is submitting a revised comparison table to correct a typographical error for one item and provide clarification to another. Accordingly, this letter and the attachment, provides a replacement table with the changes noted by revision bars

There are no regulatory commitments contained within this letter.

Please feel free to contact me at (802) 258-4236, if there are any questions regarding this submittal.

Sincerely,

James M. DeVincentis
Manager, Licensing
Vermont Yankee Nuclear Power Station

Attachment (1)

cc: USNRC Region 1 Administrator
USNRC Resident Inspector - VY
USNRC Project Manager - VY
Vermont Department of Public Service

¹ Reference VY Letter to USNRC, BVY 03-89, "Supplement 2 to Fourth-Interval Inservice Inspection (ISI) Program Plan – Submittal of Relief Request RI-01," dated October 1, 2003.

² Reference VY Letter to USNRC, BVY 03-120, "Supplement to Relief Request RI-01," dated December 23, 2003.

³ Reference VY Letter to USNRC, BVY 04-07, "Supplement to Relief Request RI-01," dated January 22, 2004.

⁴ Reference VY Letter to USNRC, BVY 05-059, "Revised Response to Request for Additional Information Regarding Relief Request RI-01," dated June 8, 2005.

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ATTACHMENT TO BVY 05-071

**Revised Comparison Table
Regarding Relief Request RI-01**

**ENTERGY NUCLEAR OPERATIONS, INC.
VERMONT YANKEE NUCLEAR POWER STATION
DOCKET NO. 50-271**

**Comparison of ASME Category B-N-1 and B-N-2 Requirements
With BWRVIP Guidance Requirements (Note 1)**

ASME Item No. Table IWB-2500-1	Component	ASME Exam Scope	ASME Exam	ASME Frequency	Applicable BWRVIP Document	BWRVIP Exam Scope	BWRVIP Exam	BWRVIP Frequency
B13.10	Reactor Vessel Interior	Accessible Areas (Non-specific)	VT-3	Each period	BWRVIP-18, 25, 26, 38, 41, 47, 48, 76	Per VY Program Procedure PP 7027 See Attached Table 1		
B13.20	Interior Attachments Within Beltline – Riser Braces	Accessible Welds	VT-1	Each 10- year Interval	BWRVIP-48 Table 3-2	Riser Brace Attachment	EVT-1	100% in first 12 years, 25% during each subsequent 6 years
	Lower Surveillance Specimen Holder Brackets				BWRVIP-48 Table 3-2	Bracket Attachment	VT-1	Each 10-year Interval
B13.30	Interior Attachments Beyond Beltline – Steam Dryer Hold- down Brackets	Accessible Welds	VT-3	Each 10- year Interval	BWRVIP-48 Table 3-2	Bracket Attachment	VT-3	Each 10-year Interval
	Guide Rod Brackets				BWRVIP-48 Table 3-2	Bracket Attachment	VT-3	Each 10-year Interval
	Steam Dryer Support Brackets				BWRVIP-48 Table 3-2	Bracket Attachment	EVT-1	Each 10-year Interval
	Feedwater Sparger Brackets				BWRVIP-48 Table 3-2	Bracket Attachment	EVT-1	Each 10-year Interval
	Core Spray Piping Brackets				BWRVIP-48 Table 3-2	Bracket Attachment	EVT-1	Every 4 Refueling Cycles
	Upper and Middle Surveillance Specimen Holder Brackets				BWRVIP-48 Table 3-2	Bracket Attachment	VT-3	Each 10-year Interval
	Shroud Support (Weld H9)				BWRVIP-38 3.1.3.2, Figure 3-5	Weld H9	EVT-1 or UT	Maximum of 6 years for EVT-1, Maximum of 10 years for UT
	Shroud Support Legs (H12 Welds)	(Rarely Accessible)			BWRVIP-38 3.2.3	Not Required (Note 2)	Not Required (Note 2)	Not Required (Note 2)
B13.40	Integrally Welded Core Support Structure – Shroud Support	Accessible Surfaces	VT-3	Each 10- year Interval	BWRVIP-38 3.1.3.2, Figure 3-5	Welds H8, H9	EVT-1 or UT	Maximum 6 years for EVT-1, 10 years for UT
	Shroud				BWRVIP-76 2.2.1	Welds H1, H2	EVT-1 or UT	Maximum 10 years
					BWRVIP-76 Figure 3-3	Vertical, Ring Seg. Welds Below H2	EVT-1 or UT	Maximum 6 years for one-sided EVT-1, 10 years for UT
					BWRVIP-76 3.5	Tie-rod Repair	VT-3	All four within 10 years

NOTE 1: This Table provides only an overview of the requirements. For more details, refer to ASME Section XI, Table IWB-2500-1, and the appropriate BWRVIP document.

NOTE 2: Periodically VY will have access to the lower plenum welds due to maintenance activities not related to the inspection recommendations in the BWRVIP guidelines. In such cases, VY will perform a visual inspection of the shroud support leg welds to the extent practical. When inspection tooling and methodologies are developed that allows access to the lower plenum without disassembly beyond normal refueling activities, shroud support leg welds will be inspected with an appropriate NDE method. Results of inspections will be used to determine a re-inspection schedule. VY will adopt future inspection methods and schedules as they are developed and included into BWRVIP-38 and approved by the NRC staff.