

From: Donald Florek *DF*
To: Anthony McMurtray; Brian Holian; Cliff Anderson; David Pelton; Donald Florek; Neil Sheehan; Rick Ennis; William Ruland
Date: 3/16/04 3:03PM
Subject: VY Annual Assessment Strategy Meeting

We plan to conduct a strategy meeting on Thursday March 18 at 1:00 pm to discuss the plans and strategy for the public session of the VY annual assessment meeting. Are you available?

Our current thinking is to complete the business portion of the annual assessment meeting with no presentation or discussion on power uprate issues. After the business portion, following a short break, we anticipate that the NRC (HQS and Region) will have a short slide presentation on the power uprate and related issues. We plan to start with the slides proposed for the 12-10-03 VSNAP (see attached) and revise as necessary. (i.e issues from UCS Lochbaum and Blanche). Meeting is to strategize on scope and presenters.

If a 1:00 pm meeting on Thurs is agreeable, I will get a bridge number.

C-161



U.S. Nuclear Regulatory Commission

Brian Holian, Deputy Director
Division of Reactor Projects - Region I

David Pelton, Senior Resident Inspector
Vermont Yankee





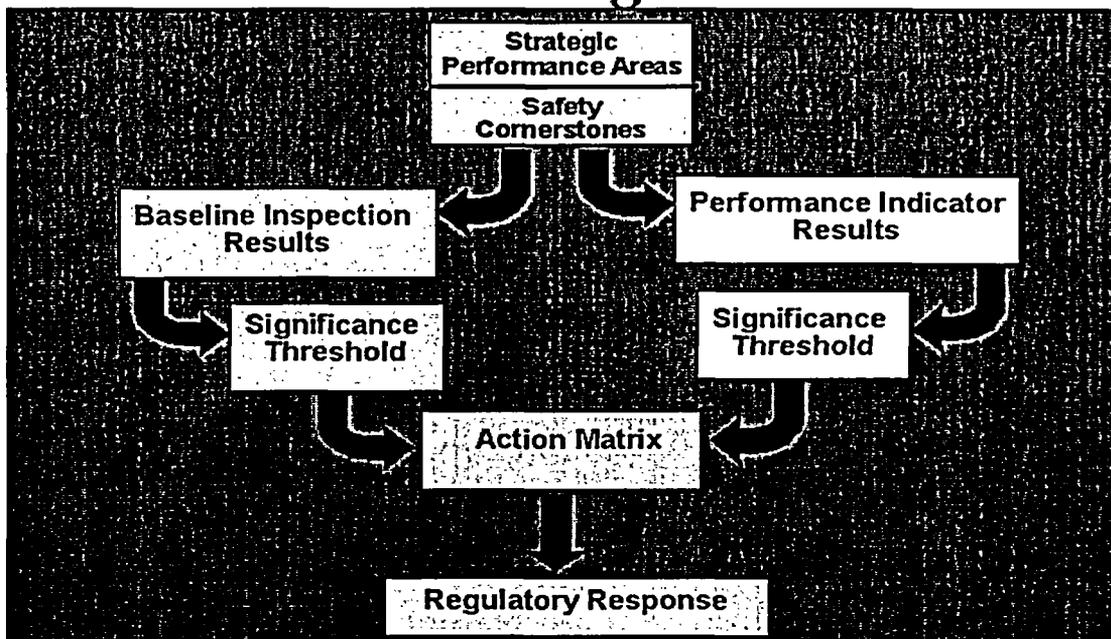
Overview

- Current Reactor Oversight Program / VY Plant Assessment
- Power Uprate Process
- Independent Safety Assessment (ISA) used at Maine Yankee
- Regulatory Lessons Learned
- Conclusions





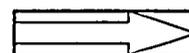
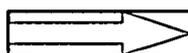
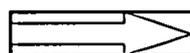
Reactor Oversight Process





Action Matrix Concept

Licensee Response	Regulatory Response	Degraded Cornerstone	Multiple/Rep. Degraded Cornerstone	Unacceptable Performance
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- Increasing Safety Significance
- Increasing NRC Inspection Efforts
- Increasing NRC/Licensee Management Involvement
- Increasing Regulatory Actions





Graded NRC Response / Supplemental Inspections

- Indian Point 2
- Point Beach
 - Multiple/Repetitive Degraded Cornerstone
 - High Safety Significance Finding (Auxiliary Feed Pumps)
 - 95003 Supplemental Inspection





Graded NRC Response / Supplemental Inspections (cont.)

- Cooper
 - Multiple/Repetitive Degraded Cornerstone
 - 3 White Findings in Emergency Preparedness Cornerstone
- As Plants Cross Thresholds, Regulatory Actions Taken to Address Problems





Safety System Design Inspections

Procedure – 71

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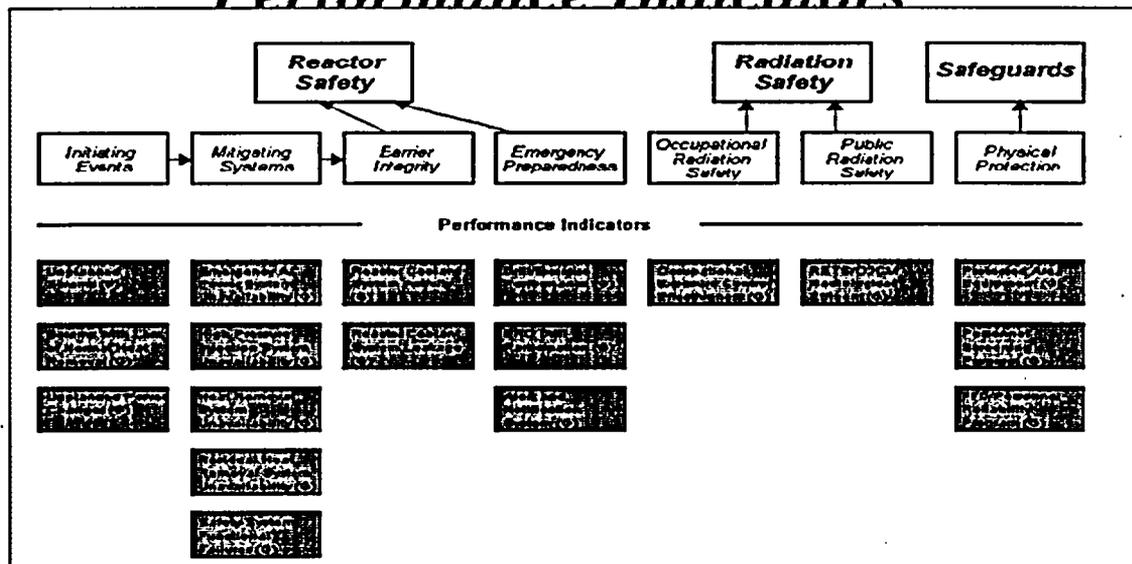
Vermont Yankee Inspection Activities

- January 1 – December 14, 2003: 4,533 Hours of Inspection Related Activities
- Two Resident Inspectors Assigned to Site
- Since September of 2000 There Has Been 665 Hours of Safety System Design Inspection
 - Findings Identified Were All of Very Low Safety Significance





Vermont Yankee Performance Indicators



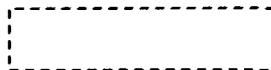
- WWW.NRC.GOV then click Reactor Oversight Process



Vermont Yankee Assessment Results

January 1, 2003 – December 10, 2003

- Operated Safely
- Licensee Response Column of the Action Matrix Throughout 2003 (Cornerstone Objectives Fully Met)
- NRC can Remove a Plant from ROP (e.g., Davis Besse - Manual Chapter 0350 Criteria)





Power Uprate Review Effort

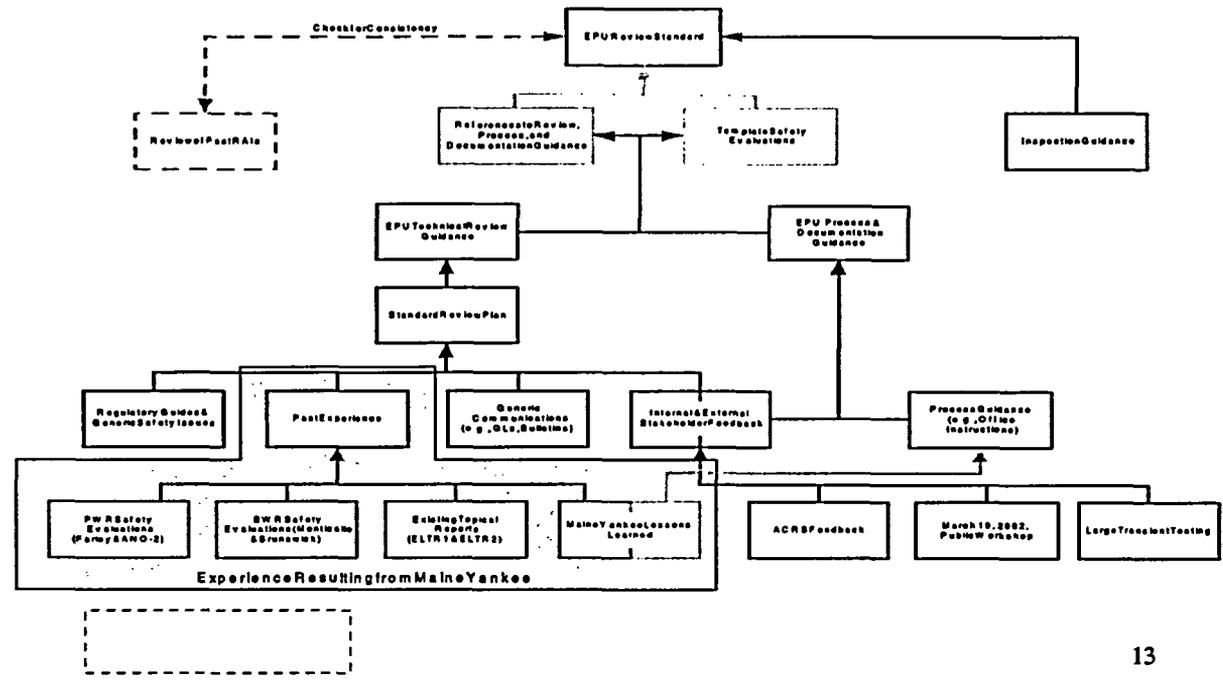
Slide was presented during June, 2003 VSNAP Meeting

- Large Effect
 - 17 Technical Groups – Multiple Reviewers per group
 - About 4000 Staff-Hours (Typical Licensing Action ~ 80 hours)
 - 100 – 200 Questions (Requests for Additional Information)

- Methods of Review
 - Review of Information Submitted and other Material
 - Audits of Licensee and Contractor Calculations and Programs
 - Independent Calculations
 - Requests for Additional Information
 - Previous Experience with Plant-Specific Power Uprates and Generic Topical Reports



Extended Power Uprate Review Standard Effort





Vermont Yankee

Extended Power Uprate Inspection

- NRC Inspection Procedure IP 71004, "Power Uprate"
 - Flow Accelerated Corrosion, Integrated Operating and Testing, Plant Modification and Design Changes
- Integrated Effort – Resident Staff, Division of Reactor Safety Specialists





Current Status

Vermont Yankee Uprate

- 9/10/03 – Entergy application for Extended Power Uprate Amendment request sent to NRC for review
- Based on initial review, NRC staff identified several areas where application was incomplete. This has resulted in supplements from Entergy.

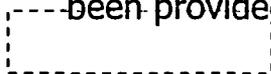




Current Status

Vermont Yankee Uprate (cont.)

- 10/30/03 – Public Meeting was held at NRC Headquarters to discuss the EPU application and several other related amendment requests.
- Technical review is being performed by numerous different sections within the NRR technical staff (approximately 19 different reviewers)
- 12/15/03 - The NRC staff issued a letter to Entergy providing the results of the acceptance review of the EPU application. The letter concludes that the licensee's application is not complete and the staff's 12-month review schedule will start when a complete application is received. The technical review will continue for areas for which sufficient information has already been provided.





Factors Leading to Performance of ISAT at Maine Yankee

- Allegations Regarding Computer Code
 - Accident Analysis
- Office of Inspector General Inquiry
- Aspect of Regulatory Process in Place at the Time (Diagnostic Evaluation Teams, etc.)
- Reserved for Unique Situations where Staff had Significant Concerns with Conformance to License Requirements, etc.





Lessons Learned

- Regulatory Lessons Learned
 - Analytic Code Validation
 - Compliance with Safety Evaluation
 - Licensing Reviews for Power Uprates
 - Net Positive Suction Head Requirements
 - Inspection Program Issues

- Follow-up
 - 10 CFR 50.54(f) Letters
 - SECY-97-036 – Problems with Licensing Issues at Millstone and Maine Yankee
 - SECY-97-042- Response to OIG Findings
 - MY Lessons Learned Task Force



Examples of Vermont Yankee Reviews/Inspections

- 50.54(f) - Progress and Processes to Ensure Operation in Accordance with Design and Adequacy of Design Bases Information
- Architect/Engineer Inspections for Several Sites
- Architect/Engineer Team at VY - Spring of 1997 - Six Independent Assessors
 - Reviewed Plant Design and Configuration and Conformance with Safety Analysis Report





Examples of Vermont Yankee Reviews/Inspections (cont.)

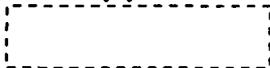
- Region I NRC Conducted Follow-Up and Special Inspection
- Appropriate Enforcement Taken
- VY Took Prompt and Comprehensive Corrective Action
- ROP Continues Design Inspections via Baseline Inspections





Conclusion

- Maine Yankee lessons learned were utilized as an input in the development of the review standard for extended power uprates
- Circumstances surrounding Millstone/Maine Yankee have resulted in NRC and industry lessons learned
- The current Vermont Yankee performance assessment results in baseline inspections
 - If performance degrades, the ROP will use a graded approach to escalate future NRC inspections





Conclusion (cont.)

- Independent Safety Assessment outside of the ROP is not warranted for Vermont Yankee
- NRC staff plans to review uprate application in accordance with current review processes and procedures





Information Available at NRC's Public Website

- Power Uprate

<http://www.nrc.gov/reactors/operating/licensing/power-uprates.html>

- Reactor Oversight Process Information

<http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html>





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Extended Power Uprates at Boiling-Water Reactors

- Monticello → 6.3%
- Hatch 1 and 2 → 2-8%
- Duane Arnold → 15.3%
- Dresden 2 and 3 → 17%
- Quad Cities 1 and 2 → 17.8%
- Clinton → 20%
- Brunswick 1 and 2 → 15%

• *Slide was presented during June, 2003 VSNAP Meeting*



Supplemental Inspection Example

Vermont Yankee

- Operational Safeguards Response Evaluation
 - Findings (Week of August 20, 2001)
 - Compensatory Measures
 - Significance Determination resulted in Yellow finding
- Supplemental Inspection was performed (9-23-2002)
- NRC determined that major upgrades to security program had been implemented
- NRC closed the Yellow finding in accordance with IMC 0305 (10-1-2002)



Mail Envelope Properties (40575D94.B29 : 23 : 8208)

Subject: VY Annual Assessment Strategy Meeting
Creation Date: 3/16/04 3:03PM
From: Donald Florek

Created By: DJF1@nrc.gov

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nrc.gov		
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BEH (Brian Holian)	Deleted	04/01/04 10:19PM
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CJA (Cliff Anderson)	Opened	03/16/04 03:04PM
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DLP1 (David Pelton)	Opened	03/16/04 03:07PM
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WHR (William Ruland)

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