

From: "Hamer, Mike" <mhamer@entergy.com>
To: "Johnny Eads" <JHE@nrc.gov>, "Faison, Charlene D" <CFaison@entergy.com>, "Lach, David J" <DLach@entergy.com>, "YOUNG, GARRY G" <GYOUNG4@entergy.com>, "Devincentis, Jim" <jdevinc@entergy.com>, "Hoffman, John" <jhoffm1@entergy.com>, <Mmetell@entergy.com>
Date: 6/19/2006 5:36:51 PM
Subject: RE: Items Needed To Fully Respond To AMR/AMP Questions

Johnny,

Attached is an updated LR Commitment List (6/19), and a list of the LRA Amendments both in draft form. Please confirm receipt via e-mail reply.

-----Original Message-----

From: Johnny Eads [mailto:JHE@nrc.gov]
Sent: Thursday, June 15, 2006 1:45 PM
To: Faison, Charlene D; Lach, David J; YOUNG, GARRY G; Devincentis, Jim; Hoffman, John; Hamer, Mike; Mmetell@entergy.com
Cc: Jonathan Rowley; Jacob Zimmerman; Kenneth Chang ; Michael Morgan
Subject: Fwd: Items Needed To Fully Respond To AMR/AMP Questions

A number of VY responses to NRC audit questions refer to "commitments", "LRA amendments", and "One-Time Inspection (OTI) Items". In order to appropriately address and disposition each of the question responses, the NRC audit team is requesting the following from the applicant:

- 1) The current listing of commitment items
- 2) The current listing of "LRA amendment" items
- 3) The current listing of OTI items

Please provide the requested lists by first thing Monday morning, June 19th.

CC: "Jonathan Rowley" <JGR@nrc.gov>, "Jacob Zimmerman" <JIZ@nrc.gov>, "Kenneth Chang" <KXC2@nrc.gov>, "Michael Morgan" <MJM2@nrc.gov>

Mail Envelope Properties (449718E2.E8B : 12 : 11915)

Subject: RE: Items Needed To Fully Respond To AMR/AMP Questions
Creation Date 6/19/2006 5:35:29 PM
From: "Hamer, Mike" <mhamer@entergy.com>

Created By: mhamer@entergy.com

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Files	Size	Date & Time
MESSAGE	1006	6/19/2006 5:35:29 PM
VY LR Commitment List 6-19-06.pdf		919483
VY LRA Amendment List 6-19-06.pdf		3339239
Mime.822	1	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled

APPENDIX A COMMITMENTS FOR LICENSE RENEWAL

During the development and review of the Vermont Yankee Nuclear Power Station License Renewal Application, Entergy made commitments to provide aging management programs to manage the effects of aging on structures and components during the extended period of operation. The following table lists these license renewal commitments, along with the implementation schedule and the source of the commitment.

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
1	Guidance for performing examinations of buried piping will be enhanced to specify that coating degradation and corrosion are attributes to be evaluated.	March 21, 2012		B.1.1/Audit Items 5 & 130
2	Fifteen (15) percent of the top guide locations will be inspected using enhanced visual inspection technique, EVT-1, within the first 18 years of the period of extended operation, with at least one third of the inspections to be completed within the first 6 years and at least two-thirds within the first 12 years of the period of extended operation. Locations selected for examination will be areas that have exceeded the neutron fluence threshold.	As stated in the commitment		B.1.7/Audit Item 14
3	The Diesel Fuel Monitoring Program will be enhanced to ensure ultrasonic thickness measurement of the fuel oil storage tank bottom surface will be performed every 10 years during tank cleaning and inspection.	March 21, 2012		B.1.9
4	The Diesel Fuel Monitoring Program will be enhanced to specify UT measurements of the fuel oil storage tank bottom surface will have acceptance criterion $\geq 60\%$ Thru.	March 21, 2012		B.1.9
5	The Fatigue Monitoring Program will be modified to either require periodic update of cumulative fatigue usage factors (CUFs), or to require update of CUFs if the number of accumulated cycles approaches the number assumed in the design calculation.	March 21, 2012		B.1.11

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
6	A computerized monitoring program (e.g., FatiguePro) will be used to directly determine cumulative fatigue usage factors (CUFs) for locations of interest.	March 21, 2012		B.1.11
7	The allowable number of effective transients will be established for monitored transients. This will allow quantitative projection of future margin.	March 21, 2012		B.1.11
8	Procedures will be enhanced to specify that fire damper frames in fire barriers shall be inspected for corrosion. Acceptance criteria will be enhanced to verify no significant corrosion.	March 21, 2012		B.1.12.1/Audit Items 35, 151, 152 & 153
9	Procedures will be enhanced to state that the diesel engine sub-systems (including the fuel supply line) shall be observed while the pump is running. Acceptance criteria will be enhanced to verify that the diesel engine did not exhibit signs of degradation while it was running; such as fuel oil, lube oil, coolant, or exhaust gas leakage.	March 21, 2012		B.1.12.1/Audit Items 33, 150 & 155
10	The Fire Water System Program will be enhanced to specify that a sample of sprinkler heads will be inspected using guidance of NFPA 25 (2002 edition) Section 5.3.1.1. NFPA 25 also contains guidance to repeat this sampling every 10 years after initial field service testing.	Within 180 days after entering the period of extended operation		B.1.12.2
11	The Fire Water System Program will be enhanced to specify that wall thickness evaluations of fire protection piping will be performed on system components using non-intrusive techniques (e.g., volumetric testing) to identify evidence of loss of material due to corrosion. These inspections will be performed before the end of the current operating term and at intervals thereafter during the period of extended operation. Results of the initial evaluations will be used to determine the appropriate inspection interval to ensure aging effects are identified prior to loss of intended function.	March 21, 2012		B.1.12.2/Audit Items 37 & 41

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
12	Implement the Heat Exchanger Monitoring Program as described in LRA Section B.1.14.	March 21, 2012		B.1.14
13	Implement the Non-EQ Inaccessible Medium-Voltage Cable Program as described in LRA Section B.1.17.	March 21, 2012		B.1.17
14	Implement the Non-EQ Instrumentation Circuits Test Review Program as described in LRA Section B.1.18.	March 21, 2012		B.1.18
15	Implement the Non-EQ Insulated Cables and Connections Program as described in LRA Section B.1.19.	March 21, 2012		B.1.19
16	Implement the One-Time Inspection Program as described in LRA Section B.1.21.	March 21, 2012		B.1.21
17	Enhance the Periodic Surveillance and Preventive Maintenance Program as necessary to assure that the effects of aging will be managed as described in LRA Section B.1.22.	March 21, 2012		B.1.22
18	Enhance the Reactor Vessel Surveillance Program to proceduralize the data analysis, acceptance criteria, and corrective actions described in the program description in LRA Section B.1.24.	March 21, 2012		B.1.24
19	Implement the Selective Leaching Program as described in LRA Section B.1.19.	March 21, 2012		B.1.25
20	Enhance the Structures Monitoring Program to specify that process facility crane rails and girders condensate storage tank (CST) enclosure, CO ₂ tank enclosure, N ₂ tank enclosure and restraining wall, CST pipe trench, diesel generator cable trench, fuel oil pump house, service water pipe trench, manway seals and gaskets, and hatch seals and gaskets are included in the program.	March 21, 2012		B.1.27.2
21	Guidance for performing structural examinations of wood to identify loss of material, cracking, and change in material properties will be added to the Structures Monitoring Program.	March 21, 2012		B.1.27.2

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
22	Guidance for performing structural examinations of elastomers (seals and gaskets) to identify cracking and change in material properties (cracking when manually flexed) will be enhanced in the Structures Monitoring Program procedure.	March 21, 2012		B.1.27.2
23	Guidance for performing structural examinations of PVC cooling tower fill to identify cracking and change in material properties will be added to the Structures Monitoring Program procedure.	March 21, 2012		B.1.27.2
24	System walkdown guidance documents will be enhanced to perform periodic system engineer inspections of systems in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4 (a)(1) and (a)(3). Inspections shall include areas surrounding the subject systems to identify hazards to those systems. Inspections of primary systems that could impact the subject system will include SSCs that are in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4 (a)(3).	March 21, 2012		B.1.28/Audit Items 187, 188 & 190
25	Implement the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program as described in LRA Section B.1.29.	March 21, 2012		B.1.29
26	Procedures will be enhanced to flush the John Deere diesel cooling water system and replace the coolant and coolant conditioner every three years.	March 21, 2012		B.1.30.1/Audit Items 84 & 164

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
27	<p>For each location that may exceed a CUF of 1.0 when considering environmental effects, VYNPS will implement one or more of the following:</p> <p>(1) further refinement of the fatigue analyses to lower the predicted CUFs to less than 1.0;</p> <p>(2) management of fatigue at the affected locations by an inspection program that has been reviewed and approved by the NRC (e.g., periodic non-destructive examination of the affected locations at inspection intervals to be determined by a method acceptable to the NRC);</p> <p>(3) repair or replacement of the affected locations.</p> <p>Should VYNPS select the option to manage environmental-assisted fatigue during the period of extended operation, details of the aging management program such as scope, qualification, method, and frequency will be provided to the NRC prior to the period of extended operation.</p>	<p>March 21, 2012</p> <p>March 21, 2010 for performing a fatigue analysis that addresses the effects of reactor coolant environment on fatigue (in accordance with an NRC approved version of the ASME Code)</p>		4.3.3/ Audit Items 29, 107 & 318
28	<p>Revise program procedures to indicate that the Instrument Air Program will maintain instrument air quality in accordance with ISA S7.3</p>	March 21, 2012		B.1.16/Audit Item 47
29	<p>VYNPS will either install core plate wedges or complete a plant-specific analysis to determine acceptance criteria for continued inspection of core plate hold down bolting in accordance with BWRM 25.</p>	March 21, 2012		B.1.7/ Audit Item 9
30	<p>Revise System Walkdown Program to specify CO₂ system inspections every 6 months.</p>	March 21, 2012.		B.1.28/ Audit Items 30, 141, 146 & 298
31	<p>Revise Fire Water System Program to specify annual fire hydrant gasket inspections and flow tests.</p>	March 21, 2012		B.1.12.2/ Audit Items 39 & 40
32	<p>Implement the Metal Enclosed Bus Program in accordance with a license renewal application amendment.</p>	March 21, 2012		Audit Item 97

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
33	Enhance the Structures Monitoring Program to ensure an engineering evaluation is made on a periodic basis of groundwater samples to assess aggressiveness of groundwater to concrete.	March 21, 2012		B.1.27/ Audit Item 77
34	Implement the Bolting Integrity Program in accordance with a license renewal application amendment.	March 21, 2012		Audit Items 198, 216, 218, 237, 331 & 333

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
001	N/A	N/A	EPU Power Change	ML060800223	03/15/06	NO
002	N/A	N/A	Drywell Shell Information	ML061380079	05/15/06	NO
003	11	B.1.7	<p>Accessible regions of the core shroud welds H1,H2 & H3 are UT examined IAW BWRVIP-76. Portions of the total accessible regions of H1,H2 & H3 are characterized as design reliant analysis performed by the shroud repair designer determined the minimum design reliant weld lengths.</p> <p>1. The exception to the BWR vessel internals program related to the core shroud (page B-27) will be deleted.</p> <p>2. Exception Note #1 on page B- 29 will be deleted.</p>			NO
003	26	B.1.10	<p>LRA Appendix B.1.10 will be revised to add the following: VYNPS may perform re-analysis of an aging evaluation in order to extend the qualification of electrical components under 10 CFR 50.49 on a routine basis as part of the plant's EQ program. Important attributes for the re-analysis of an aging evaluation include analytical methods, data collection and reduction methods, underlying assumptions, acceptance criteria, and corrective actions. See LR D-Base for further details.</p>			NO
003	48	B.1.17	<p>LRA Appendix B.1.17 will be revised to include the following: VYNPS inspection for water accumulation in manholes is conducted by a plant procedure. An engineering evaluation will be used per EN-LI-102 to document and determine the plant experience that is considered in manhole inspection frequency.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	51	B.1.18	<p>LRA Appendix B.1.18 will be revised as follows:</p> <p>The first test of neutron monitoring system cables that are disconnected during instrument calibrations shall be completed before the period of extended operation and subsequent tests will occur at least every 10 years. In accordance with the Corrective Action Program, an engineering evaluation will be performed when test acceptance criteria are not met and corrective actions including modified inspection frequency will be implemented to ensure that the intended functions of the cables can be maintained consistent with the current licensing basis for the period of extended operation.</p>			NO
003	53	B.1.19	<p>The LRA Appendix B.1.19 program description will be changed to read as follows:</p> <p>This program addresses cables and connections at plants whose configuration is such that most cables and connections installed in adverse localized environments are accessible. This program can be thought of as a sampling program. Selected cables and connections from accessible areas will be inspected and represent, with reasonable assurance, all cables and connections in the adverse localized environments. If an unacceptable condition or situation is identified for a cable or connection in the inspection sample, a determination will be made as to whether the same condition or situation is applicable to other accessible cables or connections. The sample size will be increased based on an evaluation per EN-LI-102 - Corrective Action Process.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003		B.1.23	<p>As noted in GALL, Section XI.M3, [Element Number ten (10) - "Operating Experience"]; GALL-recommended programs should have provisions regarding inspection techniques and evaluation. VYNPS states, in its explanation of the existing program, that "...recent (2002 and 2004) visual and ultrasonic inspections...revealed no recordable indications..". The NRC has asked VYNPS to compare examinations performed in 2002 and 2004 with the "exception-stated" examination technique proposed for future examinations and to provide to the staff the results of this comparison.</p> <p>The 2002 examinations included visual and ultrasonic inspections. The 2004 examinations were visual only as per the stated exception. Future examinations will be visual only in accordance with ASME Code Case N-652. Code Case N-652 has been endorsed by the NRC per Table 1 of Regulatory Guide 1.147, Revision 14. As this Code Case is now endorsed, this inspection is no longer an exception to GALL. The LRA Supplement Letter will revoke this GALL exception.</p>			NO
003	93	3.6.2.2.3 & Table 3.6.1	<p>LRA Table 3.6.1 and section 3.6.2.2.3 will be revised as shown below:</p> <p>Table 3.6.1 Item # 12 - Transmission conductors and connections.</p> <p>Timing Effects - Section 3.6.2.2.3</p> <p>See LR D-Base for details.</p>			NO
003	106	B.1.2.3	<p>GALL Exception Changed</p> <p>The existing examinations for the reactor vessel closure studs (Category B-G-2) are based on ASME Code Case N-652. Code Case N-652 has been endorsed by the NRC per Table 1 of Regulatory Guide 1.147, Revision 14. As this Code Case is now endorsed, this inspection is no longer an exception to GALL. The LRA Supplement Letter will revoke this GALL exception.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	118	B.1.17	LRA Appendix B.1.17 will be revised to state that the specific type of test to be performed will be determined prior to the initial test and is to be a proven test for detecting deterioration of the insulation system due to wetting as described in EPRI TR-103834-P1-2, or other testing that is state-of-the-art at the time the test is performed.			NO
003	120	B.1.17	Currently AMP B.1.17 defines medium-voltage cable voltage level from 2kV to 15kV. LRA Appendix B.1.17 will be revised to define medium-voltage cable as voltage level from 2kV to 35kV.			NO
003	124	B.1.19	The VYNPS B.1.19 will be revised to state that the program applies to accessible electrical cables and connections within the scope of license renewal that are installed in adverse localized environments caused by heat or radiation in the presence of oxygen.			NO
003	165	B.1.30.1	Items 3.3.1-50 and 3.3.1-51 in LRA Table 3.3.1 will be updated to reflect that the demineralized water system is managed by the Water Chemistry Control – BWH Program, as indicated in LRA Table 3.3.2-10-12, aging of components.			NO
???	143	B.1.18	B.1.18 under parameter monitored/inspected will state that the parameters monitored are determined from the specific calibration, surveillances or testing performed. The parameter for cable testing is determined from the plant procedures. Cable testing is performed by plant procedures on cables in scope of XI.E2 that are disconnected during instrument calibration.			NO
???	159	B.1.12.1	Regarding inspection of fire dampers, surveillance Test #7134 is the Operating Cycle Test of Fire Barrier Dampers, using procedure OP-7019. VY will add Fire Dampers to the program description.			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
???	203	3.1.1-19	All piping and fittings less than 4" NPS, except for the head seal leak detection line, are covered by NUREG-1801 item IV.C1-1, which identifies ISI, water chemistry for BWRs and one-time inspection (OTI) for small bore piping as the applicable aging management programs for cracking. The VYNPS ISI program includes piping and fittings less than 4" NPS. The LRA will be clarified to indicate that ISI in addition to water chemistry control – BWR and OTI applies to these components.			NO
003	224	3.3.1	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO
003	225	3.3.1	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO
003	226	3.3.1	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO
003	227	3.3.1	To provide further clarification, the effectiveness of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water program is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control – Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.			NO
003	229	3.3.1	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	232	3.3.1	To provide further clarification, the effectiveness of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control – Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.			NO
003	233	3.3.1	To provide further clarification, the effectiveness of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control – Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.			NO
003	235	3.3.1	The NUREG-1801 Vol. 2 term should be VII.F1-8 rather than VIII.F1-8 for these lines.			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	239	3.3.1	<p>LRA Table 3.3.1 indicates that the One-Time Inspection Program is credited along with the water chemistry control programs for line items for which GALL recommends a one-time inspection to confirm water chemistry control. For simplicity, the subsequent tables (Table 2's) do not list the One-Time Inspection Program each time a water chemistry control program is listed. However, since the One-Time Inspection Program is applicable to each water chemistry control program, it is also applicable to each line item that credits a water chemistry control program.</p> <p>The effectiveness of the Water Chemistry Control - Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control - Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.</p> <p>Also, license renewal commitment 16 has been issued to implement the One-Time Inspection Program as described in LRA Section R.1.21.</p>			YES

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	242	3.5.1	<p>Table 3.5.2-1 on Page 3.5-50 of the LRA, for component Bellows (reactor vessel and drywell) is not consistent with the referenced NUREG-1801 Vol. 2 item. The Table 3.5.2-1 item "Bellows (reactor vessel and drywell)" and the corresponding line item in Table 2.4-1 should be deleted. The reactor vessel and drywell bellows perform no license renewal intended function. These components are not safety-related and are not required to demonstrate compliance with regulations identified in 10 CFR 54.4(a)(3). Failure of the bellows will not prevent satisfactory accomplishment of a safety function. Leakage, if any, through the bellows is directed to a drain system that prevents the leakage from contacting the outer surface of the drywell shell.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	240	3.3.1	<p>LRA Table 3.4.1 indicates that the One-Time Inspection Program is credited along with the water chemistry control programs for line items for which GALL recommends a one-time inspection to confirm water chemistry control. For simplicity, the subsequent tables (Table 2's) do not list the One-Time Inspection Program each time a water chemistry control program is listed. However, since the One-Time Inspection Program is applicable to each water chemistry control program, it is also applicable to each line item that credits a water chemistry control program.</p> <p>To provide further clarification, the effectiveness of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control – Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.</p> <p>Also, license renewal commitment 16 has been issued to implement the One-Time Inspection Program as described in LRA Section B.1.2.</p>			YES
003	242	3.5.1	<p>Table 3.5.2-1 on Page 35-50 of the LRA for component Bellows (reactor vessel and drywell) is not consistent with the referenced NUREG-180 Rev. 2 item. The Table 3.5.2-1 line item "Bellows (reactor vessel and drywell)" and the corresponding line item in Table 2.4-1 should be deleted. See LRA Base for details.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	243	3.5.1	<p>The LRA will be amended as follows:</p> <p>Table 3.5.2-1 will be updated to reflect the AMP as CII-IWE</p> <p>Table line Item 3.5.1-16 will be updated to read:</p> <p>"The aging effects cited in the NUREG-1801 item are loss of sealing and leakage. Loss of sealing is a consequence of the aging effects cracking and change in material properties.</p> <p>For VYNPS, the Containment Leak Rate Program manages cracking and change in material properties for the primary containment seal and gaskets. The Inservice Inspection -IWE manages cracking and change in material properties for the primary containment moisture barrier."</p>			NO
003	244	3.5.2	<p>Table 3.5.2-6 on Page 3.5-80 of the LRA for component seals and gaskets (doors, man-ways and hatches), material rubber in a protected from weather environment, the aging effects are cracking and change in material properties. The LRA will be clarified to indicate that Note "A" applies to the line for SMP.</p>			NO
003	248	3.5.2	<p>Table 3.5.2-6, Page 3.5-72, Note "A" will be changed to Note "C" for component electrical and instrument panels and enclosures, material galvanized steel in a protected from weather environment.</p>			NO
003	249	3.5.2	<p>In Table 3.5.2-6, Page 3.5-73, Note "A" will be changed to Note "C" for component flood curb, material galvanized steel in a protected from weather environment.</p>			NO
003	250	3.5.2	<p>Table 3.5.2-1, Page 3.5-58 for component Torus shell with the aging effect cracking-fatigue, the note assigned is E. Note E is consistent with NUREG-1801 material, environment, and aging effect but a different aging management program is credited. Note A should be applied here. The LRA will be amended to indicate Note A.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	255	3.5.2	<p>In Table 3.5.2-5 on Page 3.5-65 of the LRA, for component Transmission towers, material galvanized steel in an exposed to weather environment; the aging effect is none.</p> <p>As identified in the response to question A-W-13, loss of material is the aging effect requiring management and the Structures Monitoring Program is the aging management program. This is consistent NUREG-1801 Vol. 2 Item III.B4-7, summarized in Table 1 Item 3.5.1-50, and Note C applies.</p>			NO
003	257	3.5.2	<p>In Table 3.5.2-6 on Page 3.5-71 of the LRA, for component conduit, material galvanized steel in an exposed to weather environment; the aging effect is none</p> <p>As identified in the response to question A-W-13, loss of material is the aging effect requiring management and the Structures Monitoring Program is the aging management program. This is consistent NUREG-1801 Vol. 2 Item III.B4-7, summarized in Table 1 Item 3.5.1-50, and Note C applies.</p>			NO
003	258	3.5.2	<p>In Table 3.5.2-6 on Page 3.5-71 of the LRA, for component conduit support, material galvanized steel in an exposed to weather environment; the aging effect is none. Reference question A-W-13 and explain how this component is protected from constant wetting and drying conditions.</p> <p>As identified in the response to question A-W-13, loss of material is the aging effect requiring management and the Structures Monitoring Program is the aging management program. This is consistent NUREG-1801 Vol. 2 Item III.B4-7, summarized in Table 1 Item 3.5.1-50, and Note C applies.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	259	3.5.2	<p>Table 3.5.2-6, Page 3.5-72 of the LRA, for component electrical and instrument panels and enclosures, material galvanized steel in an exposed to weather environment; the aging effect is none. Reference question A-W-13 and explain how this component is protected from constant wetting and drying conditions.</p> <p>As identified in the response to question A-W-13, loss of material is the aging effect requiring management and the Structures Monitoring Program is the aging management program. This is consistent NUREG-1801 Vol. 2 Item III.B4-7, summarized in Table 1 Item 3.5.1-50, and Note C applies.</p>			NO
003	263	3.5.2	<p>Table 3.5.2-6 on Page 3.5-78 of the LRA, for component structural bolting, material galvanized steel in an exposed to weather environment; the aging effect is none. Reference question A-W-13 and explain how this component is protected from constant wetting and drying conditions.</p> <p>As identified in the response to question A-W-13, loss of material is the aging effect requiring management and the Structures Monitoring Program is the aging management program. This is consistent NUREG-1801 Vol. 2 Item III.B4-7, summarized in Table 1 Item 3.5.1-50, and Note C applies.</p>			NO
003	266	3.5.2 3.5.1	<p>For LRA Table 3.5.1-5, the discussion column should read, "The drywell steel shell and the moisture barrier where the drywell shell becomes embedded in the drywell concrete floor are inspected in accordance with the Containment Inservice Inspection (IWE) Program. To be consistent, LRA Section 3.5.2.2.1.4, should indicate that the drywell to floor moisture barrier will be inspected under the Containment Inservice Inspection (IWE) Program. The inspection is part of the Containment Inservice Inspection (IWE) Program and will be retained as part of that program through the period of extended operation."</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	267	3.5.2	<p>1) The LRA will be amended to reflect the following changes. The following line for the torus penetrations will be added to Table 3.5.2-1: Torus mechanical penetrations PB, SSR Carbon steel Protected from weather Cracking (fatigue) TLAA-metal fatigue II.B4-4 (C-13) 3.5.1 9A</p> <p>2) Since fatigue for the vent system is event driven and is not an age related effect, the following line will be deleted from Table 3.5.2-1: Drywell to torus vent system PB, SSR Carbon steel Protected from weather Cracking (fatigue) TLAA-metal fatigue II.B1.1.4 (C-21) 3.5.1 8 A</p> <p>3) The discussion column entry for Table 3.5.1 item 3.5.1-8 will be changed to state: Fatigue analysis is a TLAA for the torus shell. Fatigue of the torus to drywell vent system is event driven and the analysis is not a TLAA. See Section 3.5.2.2.1.6.</p> <p>4) The discussion column entry for Table 3.5.1 item 3.5.1-9 will be changed to state: Fatigue analysis is a TLAA for the torus penetrations. See Section 3.5.2.2.1.6.</p> <p>5) Section 3.5.2.2.1.6 will be changed to read as follows: TLAA are evaluated in accordance with 10 CFR 54.21(c) as documented in Section 4. Fatigue TLAA's for the torus and associated penetrations are evaluated and documented in Section 4.6.</p> <p>[continued on next page]</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
Cont.	Cont.	Cont.	6) Section 3.5.2.3, Time-Limited Aging Analyses, will be changed to state: TLAA identified for structural components and commodities include fatigue analyses for the torus and torus penetrations. These topics are discussed in Section 4.6.			NO
003	268	3.5.2	1) A link from items 3.5.1-12 and 3.5.1-13 will be added to section 3.5.2.2.1.8. 2) Section 3.5.2.2.1.8 should state: Cyclic loading can lead to cracking of steel and stainless steel penetration bellows, and dissimilar metal welds of BWR containments and BWR suppression pool shell and downcomers.			NO
003	269	3.5.2	See Item 268 Response			NO
003	270	3.5.1	For clarity, drywell floor liner seal will be changed to drywell shell to floor seal (moisture barrier). (Also see audit questions #76 and 243 which address changes to the LRA)			NO
003	278	3.5..2	The aging management review results for galvanized steel components in outdoor air should indicate loss of material as an aging effect with structures monitoring as the aging management program. The following discussion applies to the discussion column entry for item 434-50. See Item 278 in D-Base for additional details.			NO
003	279	3.5.1	LRA Table 3.5.1, Item 3.5.1.52 will be revised to read as follows. Loss of mechanical function due to the listed mechanisms is not an aging effect. Such failures typically result from inadequate design or operating events rather than from the effects of aging. Failures due to cyclic thermal loads are rare for structural supports due to their relatively low temperatures.			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	280	3.5.1	LRA Table 3.5.1, Item 3.5.1-54 will be revised to state: Loss of mechanical function due to distortion, dirt, overload, fatigue due to vibratory, and cyclic thermal loads is not an aging effect requiring management. Such failures typically result from inadequate design or events rather than the effects of aging. Loss of material due to corrosion, which could cause loss of mechanical function, is addressed under Item 3.5.1-56 for Groups B1.1, B1.2, and B1.3 support members."			NO
003	282	3.5.2	LRA Table 3.5.1, Line Item 3.5.1-34 discussion will be revised to add "See Section 3.5.2.2.2.4(1)".			NO
003	283	3.5.1	Due to an administrative error the reference to ACI should have been ACI 318 and not ACI 301. LRA Table 3.5.1, Item 3.5.1-35 discussion will be revised to refer to ACI 318. For clarification, a reference to Section 3.5.2.2.2.4(2) will also be added to the discussion. See also Response 284			NO
003	284	3.5.1 3.5.2	LRA Table 3.5.1, Line item Number 3.5.1-36 discussion will be revised to read as follows. Reaction with aggregates is not an applicable aging mechanism for VYNPS concrete components. See Section 3.5.2.2.2.4 (c) (although for Groups 1-5, 7, 9 this discussion is also applicable for Group 6). See Section 3.5.2.2.2.4 (d) additional discussion. Nonetheless, the Structures Monitoring Program will confirm the absence of aging effects requiring management for VYNPS Group 6 concrete components. Due to an administrative oversight, the heading of LRA Section 3.5.2.2.2.4 (c) inadvertently lists cracking of concrete due to Stress Corrosion Cracking (SCC). This section heading should have been with "Cracking Due to Expansion and Reaction with Aggregates...".			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	285	3.5.1 3.5.2	For clarification, LRA Table 3.5.1, Item Number 3.5.1-37, will be revised to state the following. "Not applicable. Nonetheless the Structures Monitoring Program will confirm the absence of aging effects regarding management for VYNPS Group 6 concrete components. See Section 3.5.2.2.2.4(3)".			NO
003	286	3.5.1	LRA Table 3.5.1, Item Number 3.5.1-40 discussion will be revised to add "See Section 3.5.2.2.2.6(1)".			NO
003	291	3.1.1	VYNPS will amend the LRA to indicate that the feedwater thermal sleeves are not subject to aging management review.			NO
003	293	3.3.1	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO
003	294	3.3.1	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	295	3.3.2	<p>LRA Table 3.3.2-11 includes stainless steel post-accident sampling system (PASS) sample line tubing and valves that are exposed to treated water or steam from the reactor coolant system on internal surfaces. The components are less than 4" NPS and are outside the Class I reactor coolant system (RCS) pressure boundary. They are, therefore, outside the scope of the BWR SCC program. Aging of the PASS sample line tubing and valves is managed by the Water Chemistry Control – BWR Program, which is verified by the One-Time Inspection Program. To provide further clarification, the effectiveness of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control – Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs. However, inspections performed under the small-bore piping activity, which applies to components within the Class-I RCS pressure boundary, will also provide data useful for evaluating the condition of these downstream components.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	297	3.1.1 3.2.1 3.3.1 3.4.1	<p>LRA Tables 3.1.1, 3.2.1, 3.3.1, and 3.4.1 indicate that the One-Time Inspection Program is credited along with the water chemistry control programs for line items for which GALL recommends a one-time inspection to confirm water chemistry control. For simplicity, the subsequent tables (Table 3.3) do not list the One-Time Inspection Program each time a water chemistry control program is listed. However, since the One-Time Inspection Program is applicable to each water chemistry control program, it is also applicable to each line item that credits a water chemistry control program.</p> <p>To provide further clarification, the effectiveness of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control – Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.</p>			NO
003	310	3.1.1 3.2.1 3.3.1 3.4.1	<p>LRA Tables 3.1.1, 3.2.1, 3.3.1, and 3.4.1 indicate that the One-Time Inspection Program is credited along with the water chemistry control programs for line items for which GALL recommends a one-time inspection to confirm water chemistry control.</p> <p>To provide further clarification of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control - Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-time Inspection Program activities will confirm the effectiveness of these programs.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	312	B.3.2.2	To clarify that the Water Chemistry Control - Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program a change is required to Appendix A, SAR supplement descriptions for the Water Chemistry Control - Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.			NO
003	313	B.3.2.2	To provide further clarification of the Water Chemistry Control - Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A, SAR supplement descriptions for the Water Chemistry Control - Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.			NO
003	315	B.3.2.2	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO
003	318	4.3.1	LRA table 4.3-1 will be amended to remove the NUREG/CR-6260 values. Entries will be removed for core spray safe end, feedwater piping, RHR return piping, and RHR piping tee.			YES

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	319	4.3.1.1	<p>The last paragraph of Section 4.3.1.1 will be clarified as follows.</p> <p>The VYNPS Fatigue Monitoring Program will assure that the allowed number of transient cycles is not exceeded. The program requires corrective action if transient cycle limits are approached. Consequently, the TLAA (fatigue analyses based on those transients will remain valid for the period of extended operation in accordance with 10 CFR 54.216(d)(1). However, when the effects of reactor coolant environment on fatigue are added to the existing fatigue analyses, several locations have a projected cumulative usage factor in excess of 1.0. See section 4.3.3 for further discussion of the effects of reactor water environment on fatigue.</p>			NO
003	320	Ref. 4.3-1	<p>The correct reference is letter BVY96-96, not 96-49. The originator, addressee, title and date were correct, only the letter number was wrong. The following is the correct citation for Reference 4.3-1.</p> <p>4.3-1 Sojka, R. E. (VYNPS) to USNRC Document Control Desk, "Response to Request for Additional Information Regarding Vermont Yankee Core Shroud Modification," BVY 96-96, letter dated August 7, 1996.</p>			NO
003	321	4.3.1.2	<p>Tables 3.1.2-1, 3.1.2-2, and 3.1.2-3 will be revised to eliminate TLAA - metal fatigue whenever there is no corresponding TLAA in Section 4.0.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	322	4.3.1.3	<p>Section 4.3.1.3 should read as follows.</p> <p>"VYNPS replaced reactor recirculation (RR) system piping in 1986. Also replaced were connecting portions of the residual heat removal (RHR) system piping. The new piping was designed and analyzed to ANSI B31.1 but was inspected and tested to ASME Section III requirements. Stress analyses for the reactor recirculation system were performed to B31.1 requirements. These analyses were not based on any time limited assumptions and as such are not TLAA.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	335	3.5.2-6	<p>In Table 3.5.2-6 on Page 3.5-80:</p> <p>1) Delete line item: Penetration sealant (fire, flood, radiation) - EN, FB, FLB, PB, SNS - Elastomer - Protected from weather - Cracking Change in material properties - Fire protection Structures Monitoring - III.A6-12 (TP-7) - 3.5.1-44 - C</p> <p>2) Add line items: Penetration sealant (fire) - EN, FB, PB, SNS - Elastomer - Protected from weather - Cracking Change in material properties - Fire Protection - VII.C.1(A)(9) - 3.5.1-44 - C</p> <p>Penetration sealant (flood, radiation) - EN, FLB, PB, SNS - Elastomer - Protected from weather - Cracking Change in material properties - Structures Monitoring - III.A6-12 (TP-7) - 3.5.1-44 - C</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	336	3.3.1 3.5.2-6	<p>Table 3.5.2-6 on page 3.5-80 of the LRA, the aging effects for component Seismic isolation joint, material elastomers in a protected from weather environment are cracking and change in material properties. The AMP shown is Fire Protection. The referenced GALL line item is VII.G-1 and the Table 1 line item is 3.3.1-61. The following changes will be made:</p> <ol style="list-style-type: none"> 1) Note C will be changed to Note 'E' 2) The discussion in Table line Item 3.3.1-61, Page 3.5-79 will be clarified to read as follows. "This line item was not used in the auxiliary systems tables. Fire barrier seals are evaluated as structural components in Section 3.5. Cracking and change in material properties of elastomer seals, including seismic isolation joints located in fire barriers, are managed by the Fire Protection Program." 3) An additional line item will be added to read as follows. Seismic isolation joint <ul style="list-style-type: none"> - SSR - Elastomer - Protected from weather - Cracking Change in material properties <ul style="list-style-type: none"> - Structures Monitoring III.A6-12 (TP-7) 3.5.1-44 			NO
003	337	3.3.1	<p>Table 3.5.2-6 on Page 3.5-72 of the LRA, the aging effect for component Fire doors material carbon steel in a protected from weather environment is loss of material.</p> <p>'Note C' will be changed to 'Note B' since the component matches NUREG-1801 and the AMP has exceptions.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	345	3.3.2-13	LRA line item error. Stainless steel that is exposed to outdoor air and wet/dry cycling is subject to loss of material. This correction requires an amendment to the LRA to identify loss of material as an aging effect which is managed by the system walkdown program.			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	350	B.1.27.3	<p>1) LRPD-02 Section 4.21.3.B. "Program Description" will be revised to read: The Vernon dam is subject to the Federal Energy Regulatory Commission (FERC) inspection program. This program consists of visual inspections in accordance with FERC guidelines and is in compliance with Title 18 of the Code of Federal Regulations, Conservation of Power and Water Resources, Part 12 (Safety of Water Power Projects and Project Works) and Division of Dam Safety and Inspections Operating Manual. The operation inspection frequency for licensed and exempt low hazard potential dams is biennially. NRC has found that mandated FERC inspection programs are acceptable for aging management.</p> <p>LRPD-02 Section 4.21.3.C- "Summary" will be revised to read: The Vernon Dam FERC Inspection (performed biennially) has been effective at managing aging effects..."</p> <p>2) LRA Section A.2.1.31 Structures Monitoring Vernon Dam FERC Program will be revised to read: The Vernon dam is subject to the Federal Energy Regulatory Commission (FERC) inspection program. This program consists of visual inspections in accordance with FERC guidelines and is in compliance with Title 18 of the Code of Federal Regulations, Conservation of Power and Water Resources, Part 12 (Safety of Water Power Projects and Project Works) and Division of Dam Safety and Inspections Operating Manual. The operation inspection frequency for licensed and exempt low hazard potential dams is biennially. As indicated in NUREG-1607 for water control structures, NRC has found that FERC / US Army Corp of Engineers dam inspections and maintenance programs are acceptable for aging management.</p>			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)
003	354	4.7.2.5 4.7.2.6	The CUFs in Section 4.7.2.5 (Vessel ID attachment welds) and Section 4.7.2.6 (Instrument penetrations) are generic analyses performed in the BWRVIP documents. These are not VYNPS specific calculations. As such, these should not be considered TLAA for VY. This requires an amendment to the LRA to delete Sections 4.7.2.5 and 4.7.2.6.			NO
003	359	3.1.1 3.2.1 3.3.1 3.4.1	To provide further clarification, the effectiveness of the Water Chemistry Control – Auxiliary Systems, BWR, and Closed Cooling Water programs is confirmed by the One-Time Inspection program. This requires an amendment to the license renewal application to change the Appendix A SAR supplement descriptions for the Water Chemistry Control, Auxiliary Systems, BWR and Closed Cooling Water programs to explicitly state One-Time Inspection Program activities will confirm the effectiveness of these programs.			NO
003	369	3.2.2	The One-Time Inspection program will be revised to include activities to confirm the effectiveness of the Oil Analysis and Diesel Fuel Monitoring programs.			NO
003	371	4.3-2	The LRA will be amended to include the following discussion of the VYNPS transient monitoring program: The VYNPS Fatigue Monitoring Program includes counting of the cycles incurred by the plant. Five transients are monitored by plant operations and recorded as they occur. It is projected that less than 60% of the design cycles for these five transients will be used through the first 60 years of operation, including the PEO. The remaining transients are monitored by plant engineering based on review of operating data at the end of each fuel cycle. These remaining transients are summarized in the Fatigue Monitoring Program as the sixth transient (Reactor Startups and Shutdowns). Engineering evaluates these transients and advises operations if the number of design cycles is being approached			NO

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LRA Amend. No.	LR Audit Item No.	Related LRA Section No.	Description / Topic	NRC Accession No.	Submittal Date	Commitment (Yes / No)

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