

*How does this address all
Gall attributes?*

VY Program Section No. SEP-CI-001
Revision No. 0
Page 1 of 27

VERMONT YANKEE
CONTAINMENT INSERVICE INSPECTION (CI)
PROGRAM SECTION
SEP-CI-001

ENTERGY NUCLEAR ENGINEERING PROGRAMS

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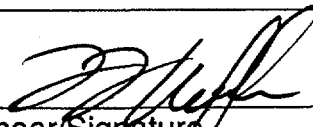
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REVIEW AND CONCURRENCE SHEET

Program Section Vermont Yankee Containment Inservice Inspection (CI) Program
Title: Section

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REVISION STATUS SHEET

PROGRAM SECTION REVISION SUMMARY	
Revision	Description
0	Revision 0 is prepared to implement the Vermont Yankee Containment Inservice Inspection (CI) Program Section in compliance with the requirements of EN-DC-120 Rev. 0.

PAGE REVISION STATUS									
Page No.	Revision	Page No.	Revision	Page No.	Revision	Page No.	Revision	Page No.	Revision
1	0	21	0						
2	0	22	0						
3	0	23	0						
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1.0 INTRODUCTION AND PLAN DESCRIPTION

ENN-DC-120, ASME Section XI Code Programs, in concert with SEP-CI-001 implements the requirements for the Fourth Ten-Year Interval Containment Inservice Inspection Program (Program) in accordance with Title 10 Code of Federal Regulations, Part 50, Section 55a, Codes and Standards (10CFR50.55a) dated September 26, 2002, pertaining to inspection and testing of the Primary Containment for the three periods of the Interval.

1.1 Scope

The Primary Containment System is a GE Mark I Pressure Suppression Containment System. The system consists of a Drywell (housing the reactor vessel and reactor coolant recirculation loops), a Pressure Suppression Chamber (housing a water reservoir), and the connecting vent system between the Drywell and the water pool, isolation valves, and containment cooling systems. The code of construction for the containment structure is the ASME Section III - 1965 Edition with Winter Addenda.

1.2 Discussion

The Code of Record (Code) for the program is the American Society for Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components (ASME Section XI - 1998 Edition with 2000 Addenda). The utilization of a single code edition ensures a uniform application of the Code requirements by the synchronizing the four implementing programs (i.e., SEP-IST-001, SEP-PT-001, AP 0070, and SEP-CI-001).

The Code of Record was modified by the adoption of subsubarticle IWA-4540 of the 2003 Addenda of the ASME Section XI - 2001 Edition. The adoption was approved by the NRC Safety Evaluation (NVY 05-094) dated July 25, 2005.

The program was developed by updating the Initial Ten-Year Containment (CI) Inservice Inspection Interval program to the requirements of 10CFR50.55a and the Code. The program scope was adjusted as required.

The Initial CI Interval and the Third Ten-Year Inservice Inspection Interval schedules and frequencies were based on IWA-2432 of the Code, "Inspection Program B," consisting of four ten-year intervals with three periods per interval. The Initial CI Interval ran concurrent with the Third Ten-Year Inservice Inspection Interval. August 31, 2003 ended the Third Ten-Year Inservice Inspection Interval and was established as the end of the Initial CI Interval, midway through the Second Period. As of September 1, 2003, the program was aligned with the Fourth Ten-Year Inservice Inspection Interval (Fourth ISI).

The program continuity (periodicity and frequency) has been maintained by aligning the remaining Initial CI Interval Second Period (RFO 24) with the Fourth ISI First Period (RF24). During the Initial CI Interval First Period, 100% of the required examinations were completed. Additionally, no examinations were scheduled or conducted during the first portion of the Second Period (RF23) of the Initial CI Interval. The relative interval and period starting and ending dates are outlined in the following matrix:

ISI						
Period 1 Period 2 Period 3						
1 st Interval	On-line Dec 1, 1972 ¹ to Apr 30, 1983 ²					
2 nd Interval	May 1, 1983 to Aug 31, 1986 ³	Sep 1, 1986 to Aug 31, 1990	Sep 1, 1990 to Aug 31, 1993	Initial CI Interval		
				Period 1	Period 2	Period 3
3 rd Interval	Sep 1, 1993 to Aug 31, 1996	Sep 1, 1996 to Aug 31, 2000 [RF19 to RF21]	Sep 1, 2000 to Aug 31, 2003 [RF22 to RF23]	Sep 9, 1998 to Sep 8, 2001 [RF21 to RF22]	Sep 9, 2001 to Sep 8, 2005 ⁴ [RF23 to RF25]	Sep 9, 2005 to Sep 8, 2008 [RF26 to RF27]
4 th Interval	Sep 1, 2003 to May 31, 2007 ⁵ [RF24 to RF26]	Sep 1, 2006 to Aug 31, 2010 [RF26 to RF28]	Sep 1, 2010 to Aug 31, 2013 ⁶ [RF29 to RF30]			

¹ The 1st ISI Interval was 5 years long, due to the delay in the development and implementation of ASME Section XI.

² The end date of the 1st ISI Interval was extended by 5 months, in accordance with IWA-2430(c), to permit examinations concurrent with the refueling outage. Consequently, the subsequent intervals and periods were adjusted forward 5 months.

³ In the 2nd ISI Interval - Period 1 was extended by 4 months, in accordance with IWA-2430(e), to reflect the 1985-86 pipe replacement and refueling outage. Consequently, the subsequent intervals and periods were adjusted forward 4 months.

⁴ The Initial CI Interval ended on August 31, 2003 in order to align the program with the other ASME Section XI programs.

⁵ The end date of the 4th ISI Interval - Period 1 was extended by 9 months, in accordance with IWA-2430(d)(3), to permit examinations concurrent with a refueling outage. The 1st and 2nd Periods will run concurrently through Refueling Outage 26 for the completion of 1st Period examinations.

⁶ ENVY's operating license expires March 21, 2012.

The program scope has been adjusted as required to comply with the Code. Two (2) Examination Categories have been retained from the Initial CI Interval Program: containment surfaces (E-A) and containment surfaces requiring augmented examination (E-C).

The program incorporates the following specified limitations and modifications listed in 10CFR50.55a dated Sept. 26, 2002:

- VT-1 and VT-3 visual examinations must be conducted in accordance with IWA-2200.
- Personnel conducting VT-1 or VT-3 visual examination method shall be qualified in accordance with IWA-2300.
- VT-1 visual examinations will be conducted in lieu of the "Detailed Visual" examinations of IWE-2310(c) for Examination Category E-C Item E4.11.
- VT-3 visual examinations will be conducted in lieu of the "General Visual" examinations of IWE-2310(b) for Examination Category E-A Items E1.12 and E1.20 and specifically for the bolting of Item E1.11.
- Flaws or degradation identified during the conduct of the VT-3 visual examination of Containment bolting, must be examined in accordance with the VT-1 visual examination method. The criteria in the material specification or IWB-3517.1 must be used to evaluate the Containment bolting flaws or degradation.
- An evaluation of the acceptability of inaccessible areas shall be conducted when conditions exist in accessible areas that could indicate the presence of or result in degradation to such inaccessible areas. For each inaccessible area identified, the following shall be included in the ISI Summary Report as required by IWA-6000:
 1. A description of the type, estimated extent, and conditions that led to the degradation;
 2. An evaluation of each area, including the result of the evaluation;
 3. A description of the corrective actions, if necessary.

1991
Leakage?

The program incorporates the alternative requirements for containment inspection and testing as outlined in Regulatory Guide 1.147, as needed. Presently, the following Code Cases are being implemented:

N-532-1 Alternative Requirements to Repair and Replacement Documentation
Requirements and Inservice Summary Report Preparation and Submission

The program additionally incorporates the alternative requirements for containment inspection and testing, or corrective measures as outlined in relief requests. Presently, the following relief requests are being implemented:

None

The program does not have to be submitted to the NRC staff for approval. However, the program elements and the required documentation must be maintained on site for audit.

1.3 Administration

The program provides for two processes: the first is for the performance of Code required periodic and interval examinations for Category E-A components; the second is for the examination for Category E-C augmented components as required by IWE-1240.

1.3.1 The site CI owner is the Responsible Individual of IWE-2320.

1.3.2 Implementing Procedures

- ENN-EP-001, IWE General Visual Containment Inspection, is used to execute the examination process for Category E-A, Items E1.11 and E1.30.
- ENN-NDE-10.01, VT-1 Examination, is used to execute the examination process for Category E-C, Item E4.11.
- ENN-NDE-10.03, VT-3 Examination, is used to execute the examination process for Category E-A, Items E1.11 (bolting), E1.12, and E1.20.

1.3.3 Records

The program administrative and implementing procedures, analyses, evaluations, calculations, visual examination results, and other records required to define and execute the program are retained per EN-AD-103. Copies of selected records shall be retained in the site CI owner files.

*Previous page says
use VT-1 and VT-3
in place of
"General
Visual"*

1.3.4 Reports

Reports will be generated as required per the Code. A copy of the report shall be retained in the site CI owner files.

1.3.5 Reportability

Conditions adverse to Technical Specifications must be assessed for Emergency Notification System reporting under 10CFR50.72(b)(1)(ii) and (b)(2)(i), and for a Licensee Event Report under 10CFR50.73(a)(2)(ii).

1.3.6 Evaluations

The program requires evaluations for various reasons (e.g., for the requisite Post Modification and Maintenance Testing requirements, etc.). These evaluations shall be documented and a copy retained in the site CI owner files.

1.3.7 Examinations

- General visual examinations will be conducted in accordance with the criteria of ENN-EP-001 at the frequency specified in the tables.
- VT-3 Examination will be conducted in accordance with ENN-NDE-10.03 at the frequency specified in the tables.
- VT-1 Examinations will be conducted in accordance with ENN-NDE-10.01 at the frequency specified in the tables.
- Examination results that exceed the acceptance criteria shall be documented in accordance with EN-LI-102.

1.4 Program Positions

1.4.1 The program excludes process piping and systems penetrating the Primary Containment. The excluded process piping and systems are addressed in SEP-IST-001, Inservice Inspection Program; SEP-PT-001, Inservice Inspection Pressure Test Program Section; AP 0070, ASME Section XI Repair and Replacement Procedure; or SEP-APJ-009, Primary Containment Leakage Rate Testing (Appendix J) Program Section. Boundary between the containment and piping is:

- The first circumferential joint exclusive of the connecting weld in welded connections
- The face of the first flange in bolted flange connections
- The first threaded joint in mechanical connections

1.4.2 The Primary Containment System is a GE Mark I Pressure Suppression Containment System consisting of a Drywell, a Pressure Suppression Chamber (Torus), and the connecting Vent System between the Drywell and the Torus.

The Primary Containment System is subject to Table IWE-2500-1 Examination Category E-A. Table IWE-2500-1 is further divided into:

- Item E1.11, Accessible Surface Areas - applicable to the Drywell and Torus
- Item E1.12, Wetted Surfaces of Submerged Areas - applicable to the Torus
- Item E1.20, BWR Vent System Accessible Surface Areas - applicable to the eight circular pipes connecting the Drywell to the Torus; the eight Jet Deflectors; the Vent Header interconnecting piping; the ninety-six downcomers; and the ten Vacuum Breakers including the interconnecting piping from the Torus to the Vent System
- Item E1.30, Moisture Barriers - applicable to the Drywell shell to Concrete floor intersection at elevation 238'

1.4.3 Paint and coating inspections for removal and replacement of coating or paint are included in the program examination requirements. An examination of painted or coated surfaces is required to indicate the condition of the substrate. The examinations shall be included in the applicable work documents for the paint or coating surface preparation and application. Following the application of new paint or coatings the area must be rebase-lined to establish the condition of the substrate in the area of new application.

- Surfaces subject to general visual and VT-3 Examinations will be examined with paint and coatings in an "as is" condition of IWE-2600(a).
- Surfaces subject to VT-1 Examinations will be examined with paint and coatings in an "as is" condition of IWE-2600(a) or if required in accordance with IWE-2600(b)

1.4.4 Repair and replacement activities shall be conducted in accordance with AP 0070 and inspected and documented per the requirements of the Code.

1.4.5 During the implementation of the program, the moisture barrier required per drawing 5920-233 at the intersection of the interior of the drywell shell and the concrete floor at elevation 238' was determined to have been degraded and effective reconfiguration of the seal was not performed (ER 99-1954). A minor modification was developed (MM 2000-010) to install a replacement seal. The drywell shell and the concrete floor were stripped of all paint, coatings, and sealant for approximately a six inch band either side of the intersecting joint. The drywell shell was examined by VT-3, VT-1, and ultrasonic measurement processes. The shell was determined to be satisfactory in accordance with the criteria of VYC-2043. The drywell shell was coated and the seal was replaced. Though not required by the Code of Record, the moisture barrier will be examined each refueling outage until RF27. Table 1 has been annotated to reflect this program position.

1.5 Supplemental Examinations (Non-Code)

The eight drywell shell sand-cushion transition drains are examined under this program (CAR91063_01). The drain examinations are credited as part of the Aging Management Program – Containment Inservice and Containment Leak Rate Program for License Renewal but are not the Code of Record or regulatory required. The drain lines (G-191481 Detail Sect E-E) are located directly under the vent header assemblies and terminate at the pedestal concrete wall about elevation 231'. The drain lines provide a run-off pathway if water is introduced to the air gap surrounding the drywell shell, thereby minimizing the effect of leakage (corrosion) on the external drywell shell. The lines are internally examined for freedom from obstructions and integrity up to the fine mesh screen. The drain lines are examined on a once per ten year interval. See Table 5 for the component, applicable examination requirement, and schedule for examination.

How long was the seal missing?

6.L. 82-05 requirements?

Conflict

Procedure? How do you know it works?

2.0 References

- 2.1 Technical Specification Section 3.6.E/4.6.E
- 2.2 ASME Boiler and Pressure Vessel Code, Section XI, 1998 Edition through 2000 Addenda
- 2.3 ASME Boiler and Pressure Vessel Code, Section XI, 2003 Addenda
- 2.4 Code of Federal Regulations, 10CFR50.2 Definitions
- 2.5 Code of Federal Regulations, 10CFR50.55a dated September 26, 2002
- 2.6 Code of Federal Regulations, 10CFR50 Appendix J
- 2.7 Regulatory Guide 1.147, Inservice Inspection Code Case Applicability
- 2.8 Regulatory Guide 1.26, Rev 3, Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants
- 2.9 ANS-22, Draft 4, Rev 1, Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants
- 2.10 Safety Evaluation by the Office Nuclear Reactor Regulation, Subject: Safety Evaluation of Request to use Later Addenda of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Code) – Vermont Yankee Nuclear Power Station (NVY 05-094 dated July 25, 2005)
- 2.11 CAR 91063_01
- 2.12 EN-AD-103, Document Control and Records Management Activities
- 2.13 EN-LI-102, Corrective Action Process
- 2.14 ENN-EP-001, IWE General Visual Containment Inspection
- 2.15 ENN-NDE-2.12, Certification of Visual Testing (VT) Personnel
- 2.16 ENN-NDE-10.01, VT-1 Examination
- 2.17 ENN-NDE-10.03, VT-3 Examination

3.0 CODE CASES

- 3.1 N-532-1 **ALTERNATIVE REQUIREMENTS TO REPAIR AND REPLACEMENT
DOCUMENTATION REQUIREMENTS AND INSERVICE SUMMARY REPORT
PREPARATION AND SUBMISSION**

4.0 RELIEF REQUESTS

- 4.1 The Code of Record was modified by the adoption of subsubarticle IWA-4540 of the 2003 Addenda of the ASME Section XI – 2001 Edition. The adoption was approved by the NRC Safety Evaluation (NVY 05-094) dated July 25, 2005.

5.0 PROGRAM SUMMARY

Code Category	Scheduled Parts and Percentages by Period for the 4 th Interval						
	Total Scheduled	Period 1	Percentage	Period 2	Percentage	Period 3	Percentage
E1.11	932	305	32%	322	68%	305	100%
E1.12	32	0	0%	32	100%	0	100%
E1.20	16	0	0%	16	100%	0	100%
E1.30	5	2	40%	2	80%	1	100%
E4.11	0	0					
E4.12	0	0					

6.0 CI COMPONENT DETAILS AND SCHEDULE

Table 1 TORUS and TORUS PENETRATIONS				RFO SCHEDULE			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	PERIOD ¹			REMARKS
				1	2	3	
E1.11	Bay 1	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 2	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 3	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 4	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 5	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.

Table 1 TORUS and TORUS PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	Bay 6	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 7	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 8	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 9	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 10	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 11	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 12	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 13	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 14	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.

Table 1 TORUS and TORUS PENETRATIONS				RFO SCHEDULE PERIOD [†]			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	Bay 15	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	Bay 16	6202-200 5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-200A	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-200B	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-206A	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-206B	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-206C	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-206D	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Bottom 1/3 is inaccessible.
E1.11	X-206E	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-206F	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-209A	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-209B	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-209C	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 1 TORUS and TORUS PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-209D	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Bottom 1/3 is inaccessible.
E1.11	X-210A	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Piping covered with insulation.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-210B	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Piping covered with insulation.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-211A	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Exterior piping covered with insulation.
E1.11	X-211B	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Exterior piping covered with insulation.
E1.11	X-212	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-213A	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Piping covered with insulation.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-213B	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-214	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-215	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-216	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 1 TORUS and TORUS PENETRATIONS				RFO SCHEDULE			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	PERIOD ¹			REMARKS
				1	2	3	
E1.11	X-217	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-218	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-219	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-220	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-221	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Exterior piping covered with insulation.
E1.11	X-222	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Exterior piping covered with insulation. Interior is inaccessible -blocked by 24" - HPIWE-3.
E1.11	X-223	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-224A	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Piping covered with insulation.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-224B	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Piping covered with insulation.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-225	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-226A	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.

Table 1 TORUS and TORUS PENETRATIONS				RFO SCHEDULE			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	PERIOD ¹			
				1	2	3	REMARKS
E1.11	X-226B	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-227	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-228	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible - internal to X-202E branch line.
E1.11	X-229	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible - internal to X-202C branch line.
E1.11	X-230	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible - internal to X-202J branch line.
E1.11	X-231A	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-231B	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-231C	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-231D	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-231E	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces
E1.11	X-231F	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-231G	5920-42	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 1 TORUS and TORUS PENETRATIONS				RFO SCHEDULE			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	PERIOD ¹			REMARKS
				1	2	3	
E1.11	X-231H	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces.
E1.12			VT-3		27i		Wetted surfaces of submerged areas.
E1.11	X-232	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible - internal to X-202E branch line.
E1.11	X-233	5920-42	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible - internal to X-202G branch line.

¹ i Indicates refueling outage when an "Interval" test should be performed

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	PERIOD ¹			REMARKS
				1	2	3	
E1.11	Drywell elevation 238 to elevation 251 quadrant 0 to 360 degrees	6202-1 6202-2	General Visual	24	27	29	Accessible areas of interior surfaces.
E1.11	Drywell elevation 251 to elevation 269 quadrant 0 to 360 degrees	6202-1 6202-2	General Visual	24	27	29	Accessible areas of interior surfaces. From 251' floor to 269' floor at 150° for 3' CW; 160° for 22.5' CW, and 206° for 3' CW are inaccessible due to permanent shielding.
E1.11	Drywell elevation 269 to elevation 321 quadrant 0 to 360 degrees	6202-1 6202-2	General Visual	24	27	29	Accessible areas of interior surfaces. At 180° for 22' CW from 269' floor to 275' continuing 42' from 269' floor to the bottom of the monorail and at 180° for 18' CCW from 269' floor to 275' continuing 48' from 269' floor to the bottom of the monorail are inaccessible due to permanent shielding.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	Drywell Head	6202-1 6202-2	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	Stabilizer Assembly "A"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	Stabilizer Assembly "B"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	Stabilizer Assembly "C"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	Stabilizer Assembly "D"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	Stabilizer Assembly "E"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	Stabilizer Assembly "F"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	Stabilizer Assembly "G"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	Stabilizer Assembly "H"	6202-25	General Visual	24	27	29	Accessible areas of interior surfaces (and exterior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	X-1	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-2	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-3	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Majority of the interior is blocked by duct work.
			VT-3		27i		Bolting
E1.11	X-4	5920-41	General Visual	24	27	29	Accessible areas of exterior surfaces (and interior surfaces if disassembled).
			VT-3		27i		Bolting
E1.11	X-6	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-7A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-7B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-7C	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-7D	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-8	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-9A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-9B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-10	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior surfaces. Exterior of penetration and piping covered with insulation.
E1.11	X-11	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-12	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-13B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-13A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-14	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-15	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-16A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-16B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-17	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-18	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-19	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-20	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-21	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-22	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-23	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-24	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-25	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-26	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-27	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-28	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-29	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-30	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-31	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-32	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-33	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-34	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-35A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-35B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-35C	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-35D	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-35E	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
			VT-3		27i		Bolting
E1.11	X-36	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-37A X-38A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-37B X-38B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-37C X-38C	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-37D X-38D	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-39A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-39B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-40A	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-40B	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-40C	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-40D	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-41	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-42	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-43	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-44	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-45	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-46	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-47	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-48	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-49	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-50	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-51	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-52	G-191179 5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-100A	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Both surfaces have restricted access due to junction box mounting.
E1.11	X-100B	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Both surfaces have restricted access due to junction box mounting.
E1.11	X-100C	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Both surfaces have restricted access due to junction box mounting.
E1.11	X-100D	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Both surfaces have restricted access due to junction box mounting.
E1.11	X-101A	5920-41	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible
E1.11	X-101B	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-101C	5920-41	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible
E1.11	X-101D	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-102	5920-41	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible
E1.11	X-103	5920-41	General Visual	24	27	29	Accessible areas of exterior surfaces. Top half exterior is restricted and the interior is inaccessible due to junction box mounting.
E1.11	X-104A	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Both surfaces have restricted access due to junction box mounting.
E1.11	X-104B	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Exterior is restricted and the interior is inaccessible due to junction box mounting.
E1.11	X-104C	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Exterior is restricted and the interior is inaccessible due to junction box mounting.
E1.11	X-105A	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Interior has restricted access due to junction box mounting.
E1.11	X-105B	5920-41	General Visual	24	27	29	Accessible areas of exterior surfaces. Interior is inaccessible.

Table 2 DRYWELL and DRYWELL PENETRATIONS				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.11	X-105C	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Interior has restricted access due to junction box mounting.
E1.11	X-105D	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces. Interior has restricted access due to junction box mounting.
E1.11	X-106	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.11	X-107	5920-41	General Visual	24	27	29	Accessible areas of interior and exterior surfaces.
E1.30	Drywell Moisture Barrier	5920-233 5920-12789	General Visual	24 25	26 27	29	The interface is from the Containment Plate Weld Joint left of X-5B to the Containment Plate Weld Joint right of Penetration X-5E and from the concrete metal interface up ~1 foot.
¹ i Indicates refueling outage when an "Interval" test should be performed							

Table 3 VENT SYSTEM ASSEMBLIES				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.20	Bay 2 Vent Line; Vacuum Breaker Line; Vent Header in Bays 2 & 3; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces.
E1.20	Bay 4 Vent Line; Vacuum Breaker Line; Vent Header in Bays 4 & 5; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces.
E1.20	Bay 6 Vent Line; Vacuum Breaker Line; Vent Header in Bays 6 & 7; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces.

Table 3 VENT SYSTEM ASSEMBLIES				RFO SCHEDULE PERIOD ¹			EXAMINATION CATEGORY E-A
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E1.20	Bay 8 Vent Line; Vacuum Breaker Line; Vent Header in Bays 8 & 9; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces.
E1.20	Bay 10 Vent Line; Vacuum Breaker Line; Vent Header in Bays 10 & 11; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces.
E1.20	Bay 12 Vent Line; Vacuum Breaker Line; Vent Header in Bays 12 & 13; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces.
E1.20	Bay 14 Vent Line; Vacuum Breaker Line; Vent Header in Bays 14 & 15; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces
E1.20	Bay 16 Vent Line; Vacuum Breaker Line; Vent Header in Bays 16 & 1; and Downcomers	5920-13 6202-200 6202-211	VT-3		27i		Accessible areas of interior and exterior surfaces
¹ i Indicates refueling outage when an "Interval" test should be performed							

Table 4 CONTAINMENT SURFACES				RFO SCHEDULE PERIOD			EXAMINATION CATEGORY E-C
ITEM NUMBER	DESCRIPTION	DRAWING NUMBER	EXAMINATION METHOD	1	2	3	REMARKS
E4.11	None		VT-1				Visible Surfaces
E4.12	None		VOLUMETRIC				Surface Area Grid, Minimum Wall Thickness Location

Indicates refueling outage when an "Interval" test should be performed

PROCESS APPLICABILITY DETERMINATION FORM

Page 1 of 3

I. OVERVIEWFacility: Vermont YankeeDocument(s) Reviewed SEP-CI-001Change/Rev./ 0System Vermont Yankee Containment Inservice Inspection (CI) Program
Designator(s)/Description: SectionDescription of Proposed Activity: Converted Vermont Yankee PP 7024 to SEP in accordance with the requirements of EN-DC-120.

II. PROCESS APPLICABILITY DETERMINATION**A. IMPACT DETERMINATIONS****1. Licensing Basis Document Impact**

Does the proposed activity impact any of the following Licensing Basis Documents?

<u>LICENSING BASIS DOCUMENTS (Control Process)</u>	<u>YES</u>	<u>NO</u>	<u>SECTIONS IMPACTED OR LBDCH #</u>
Operating License (OL) / Technical Specifications (TS) / NRC Orders (10 CFR 50.90 / EN-LI-103)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS Bases (10 CFR 50.59 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Updated Final Safety Analysis Report (UFSAR) (10 CFR 50.59 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual (TRM) (Including TRM Bases) (10 CFR 50.59 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Quality Assurance Program Manual (QAPM) (10 CFR 50.54(a) / EN-QV-104)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report (COLR) (10 CFR 50.59 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculation Manual (ODCM) (TS Administrative Controls, 10 CFR 50.59 / EN-LI-101, EN-LI-113)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program (FPP) [Includes the Fire Hazards Analysis (FHA)] (OL Condition, 10 CFR 50.48 / EN-DC-128)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan (10 CFR 50.54(q) / EN-EP-305)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Environmental Protection Plan (Appendix B of the OL, Environmental Evaluation / EN-EV-115, EN-LI-103)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Security Plan (10 CFR 50.54(p) / ENS-NS-210)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

PROCESS APPLICABILITY DETERMINATION FORM

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BNFL VSC-24 Storage Cask LBDs (Applicable to ANO only, other sites check "NO."):	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cask FSAR (CFSAR) (10 CFR 72.48 / EN-LI-112)			
Certificate of Compliance (CoC) (10 CFR 72.238)			
CoC Bases (10 CFR 72.48 / EN-LI-112)			
10 CFR 72.212 Evaluation Report (212 Report) (10 CFR 72.48 / EN-LI-112)			
Holtec International HI-STORM 100 Storage Cask LBDs (PNPS and W3 check "NO."):	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cask FSAR (CFSAR) (10 CFR 72.48 / EN-LI-112)			
Certificate of Compliance (CoC) (10 CFR 72.238)			
CoC Bases (10 CFR 72.48 / EN-LI-112)			
10 CFR 72.212 Evaluation Report (212 Report) (10 CFR 72.48 / EN-LI-112)			

If any of the above is answered "Yes," perform the applicable regulatory review and prepare an LBDCR per NMM Procedure EN-LI-113 if the LBD is to be changed.

2. Program Impact

Does the proposed activity involve any of the following programs?

<u>PROGRAMS (Control Process)</u>	<u>YES</u>	<u>NO</u>	<u>IMPACT</u>
Exemptions to 10 CFR (10 CFR 50.12, 10 CFR 72.7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Chemistry / Effluents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Radwaste / Process Control Program (PCP) (EN-RW-105)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Radiation Protection / ALARA	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Commitments (EN-LI-110)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Containment Leakage Testing Program (ENN-DC-334)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Inservice Inspection Program (10 CFR 50.55a / ENN-DC-120, ENS-DC-120)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Inservice Testing Program (10 CFR 50.55a / EN-DC-332)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Maintenance Rule (10 CFR 50.65 / ENN-DC-121, ENS-DC-121)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Involves a test or experiment (10 CFR 50.59 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If any of the above is answered "Yes," contact the program owner. The proposed activity cannot be implemented until the program owner takes required actions to address the impact.

PROCESS APPLICABILITY DETERMINATION FORM

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3. References

Select the type of search method used for performing the impact reviews. (More than one type may be used.) Provide the requested information for the particular type selected.

NOTE: Ensure that manual searches are performed using controlled copies of the documents. If you have any questions, contact your site Licensing department.

☐ **Electronic:** LBDs, Programs, and Keywords: _____

☒ **Manual:** LBDs, Programs, and associated sections reviewed manually: EN-DC-334, UFSAR

☐ **Impact Determination Questions were used for the following LBDs and Programs (the questions used may be attached):** _____

4. Discussion (optional)

Additional supporting information: None

B. CONCLUSIONS


1. Is an LBD CR being initiated? ☐ Yes

If "yes," enter EN-LI-113 and attach this Form to the LBD CR Form. ☒ No

2. Is a Program impacted? ☐ Yes

If "yes," inform the Program Owner to take required actions. Transmit to the Program Owner results of any applicable reviews supporting this proposed activity. ☒ No

III. SIGNATURES¹

Preparer F.T. Underkoffler /  / ENVY / EP&C / 11/27/06
Name (print) / Signature / Company / Department / Date
(Signature denotes that training on EN-LI-100 has been completed.)

**Procedure
Owner**

Name (print) / Signature / Company / Department / Date
(Required for programmatic exclusion, only.)

¹ Signatures may be obtained via electronic processes (e.g., e-mail, PCRS work tasks) or manual methods (e.g., ink signature).