

July 10, 2007

LICENSEE: Entergy Nuclear Operations, Inc.

FACILITY: Vermont Yankee Nuclear Power Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JUNE 1, 2007,  
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND ENTERGY  
NUCLEAR OPERATIONS, INC, CONCERNING CONFIRMATORY ITEMS  
PERTAINING TO THE VERMONT YANKEE NUCLEAR POWER STATION  
LICENSE RENEWAL SAFETY EVALUATION REPORT

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Entergy Nuclear Operations, Inc., held a telephone conference call on June 1, 2007, to discuss and clarify the staff's confirmatory items (CIs) concerning the Vermont Yankee Nuclear Power Station safety evaluation report.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the CIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

***/RA/***

Jonathan G. Rowley, Project Manager  
License Renewal Branch B  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures:

1. List of Participants
2. List of Confirmatory Items

cc w/encls: See next page

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DATE	07/05/07	07/05/07	07/10/07

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TELEPHONE CONFERENCE CALL  
VERMONT YANKEE NUCLEAR POWER STATION  
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS  
JUNE 1, 2007

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**CONFIRMATORY ITEMS  
VERMONT YANKEE NUCLEAR POWER STATION  
LICENSE RENEWAL SAFETY EVALUATION REPORT**

**JUNE 1, 2007**

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Entergy Nuclear Operations, Inc., held a telephone conference call on June 1, 2007, to discuss and clarify the following confirmatory items (CIs) concerning the Vermont Yankee Nuclear Power Station license renewal safety evaluation report.

**CI 2.3.3.2a-1**

License renewal drawing LRA-G-191159-SH-01-0, at location H-11, depicts pipe section 2"-SW-566C as within the scope of license renewal. The license renewal boundary flag for 2"-SW-566C is located on an unisolable section of pipe. The actual location of the license renewal scope boundary for this pipe section is not clear. The staff requested that the NRC Regional Inspection Team (RIT) perform an inspection to ensure that the license renewal scope boundaries for these components meet the requirements of 10 CFR 54.4(a)(2).

**CI 2.3.3.2a-2**

License renewal application (LRA) Section 2.1.2.1.2 states in part that nonsafety-related piping systems connected to safety-related systems were included up to the structural boundary or to a point that includes an adequate portion of the nonsafety-related piping run to conservatively include the first seismic or equivalent anchor. In addition, if isometric drawings were not readily available to identify the structural boundary, connected lines were included to a point beyond the safety/nonsafety interface, like a base-mounted component, flexible connection, or the end of a piping run (i.e., a drain line).

It is not clear whether the nonsafety-related piping systems were included up to the structural boundary or to a point that includes an adequate portion of the nonsafety-related piping run to include the first seismic or equivalent anchor. The staff requested that the NRC RIT perform an inspection to ensure that the license renewal scope boundaries for these components satisfy the requirements of 10 CFR 54.4(a)(2).

**CI 2.3.3.13e-1**

The LRA states that the circulating water system is within the scope of license renewal based on the potential for physical interaction with safety-related components as required by 10 CFR 54.4(a)(2) and described in LRA Table 2.3.3.13-A. The applicant did not provide drawings highlighting in-scope components required by 10 CFR 54.4(a)(2), stating that the drawings would not provide significant additional information because they do not indicate proximity of components to safety-related equipment and do not identify structural/seismic boundaries. Without license renewal drawings and/or detailed description of the circulating water system, the omission of components subject to an aging management review (AMR)

cannot be determined (see LRA Table 2.3.3-13-9). The staff requested that the NRC RIT perform an inspection to ensure that the license renewal scope boundaries for these components satisfy the requirements of 10 CFR 54.4(a)(2) and all the components subject to an AMR are included in LRA Table 2.3.3-13-9.

### **CI 2.3.3.13m-1**

The LRA states that the reactor water clean up system is within the scope of license renewal in accordance with 10 CFR 54.4(a)(2) because of the potential for physical interaction with safety-related components as described in LRA Table 2.3.3.13-A. The determination of whether a component meets the requirements of 10 CFR 54.4(a)(2) for physical interactions is based on where it is located in a building and its proximity to safety-related equipment or where a structural/seismic boundary exists. This information is not provided on license renewal drawings nor was a detailed description provided in the LRA. Consequently, any omission of the reactor water clean up components subject to an AMR cannot be determined. The staff requested that the NRC RIT perform an inspection to ensure that the license renewal scope boundaries for these components satisfy the requirements of 10 CFR 54.4(a)(2) and all the components subject to an AMR are included in LRA Table 2.3.3-13-36.

**Discussion:** The regional inspection team was unable to draw a firm conclusion that the scoping boundaries for the service water, circulating water, and reactor water cleanup systems had been determined. Based on the discussion with the applicant, the staff indicated that the response to these CIs requires clarification. The applicant agreed to clarify the CIs by addressing four follow-up questions to RAI 2.1-2 in a future letter to the NRC. The four follow-up questions are:

1. For the Service Water, Circulating Water, and Reactor Water Cleanup Systems, has the applicant identified the nonsafety-related portions of the system, attached to safety-related systems, structures, and components (SSCs), which are required to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2)? Are all scoping activities complete and have all component types been identified and included in the applicable tables in the LRA?
2. Are there any nonsafety-related systems for which the applicant has not identified the nonsafety-related portion of the system, attached to safety-related SSCs, which are required to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2)?
3. For all nonsafety-related systems, are all scoping activities complete and have all component types been identified and included in the applicable tables in the LRA?
4. Is the applicant taking credit for, or committing to perform, any future scoping activities?

Memo to Entergy Nuclear Operations, Inc., from J. Rowely dated July 10, 2007

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