2300 N Street, N.W. Washington, D.C. 20037-1128

Tel 202.663.8000 Fax 202.663.8007 www.pillsburvlaw.com

MATIAS F. TRAVIESO-DIAZ

202-663-8142 matias.travieso-diaz@pillsburylaw.com

February 26, 2009

Alex S. Karlin, Esq., Chairman Atomic Safety and Licensing Board Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

Atomic Safety and Licensing Board

U.S. Nuclear Regulatory Commission

Washington, D.C. 20555-0001

Administrative Judge

Mail Stop T-3 F23

Dr. Richard E. Wardwell

Administrative Judge Dr. William H. Reed Atomic Safety and Licensing Board Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

> DOCKETED USNRC

February 26, 2009 (11:13am)

OFFICE OF SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

In the Matter of Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc. (Vermont Yankee Nuclear Power Station) Docket No. 50-271-LR; ASLBP No. 06-849-03-LR

Gentlemen:

RAS H-407

In connection with an NRC Staff audit of the confirmatory environmentally assisted fatigue (CUF<sub>en</sub>) analyses that were provided to the parties to this proceeding on January 8, 2009, Entergy identified that Table 6 of Calculation 0801038.306 for the reactor recirculation outlet (RO) nozzle utilized Alloy 600 material properties instead of those for stainless steel. A supplemental evaluation using the proper input values determined that the environmentally adjusted cumulative usage factor CUF<sub>en</sub> at a non-limiting location in that nozzle (the safe end) increased from less than 1% of the allowable value to approximately 4% of the allowable value. In performing this supplemental evaluation, all calculation methods have been maintained; the limiting calculated CUF<sub>en</sub> for the RO nozzle of 0.119 remains unaffected. Therefore, the result of this finding is inconsequential.

Entergy has identified two other changes that should be made to the calculations for the RO nozzle, neither of which affects the results:

In Calculation 0801038.306, a stress concentration factor (SCF) was used in the analysis of the nozzle blend radius, whereas use of such a factor is only needed for the nozzle safe end. Since the SCF is greater than 1.0, its use led to increasing the conservatism of the

Semplete Sery-043

February 26, 2009 Page 2

 $CUF_{en}$  calculation for the nozzle blend radius. Removing the SCF that was applied to the blend radius will have no impact to the final conclusions of the calculation.

• With respect to Calculation 0801308.304, the definition of one thermal stress transient (Transient #9) is slightly different from the one used in the previous refined analysis Calculation No VY-16Q-306. Since Entergy intended to use the same thermal stress transient definitions for both sets of calculations, the definition of the transient in Calculation 0801308.304 will be modified to make it the same as for the refined calculation. Changing the definition of this thermal stress transient will have no impact on the results of the fatigue calculation for the nozzle.

In addition, Entergy identified the following editorial changes that should be made to the analysis of the reactor core spray (CS) nozzle:

<u>Calculation 0801038.302 for the CS nozzle</u>. The TOTAL stresses listed in Table 4 for Node 2166 at a time of 66,165 seconds are incorrect. However, the correct numbers are used in the analysis and are contained in all of the supporting computer files.

<u>Calculation 0801038.302 for the CS nozzle</u>. Section 4.5 includes the statement: "The location of the nozzle loads is at 137.0625 inches [4] from the center of the RPV." The dimension of 137.0625 inches is correct; however, it cannot be found in Reference [4]. A different reference will be listed as the source of the dimension.

<u>Calculation 0801038.303 for the CS nozzle</u>. This calculation will be revised to update the reference contained in it for Calculation 0801038.302 from Revision 0 to Revision 1, once Calculation 08010308.302 is revised.

None of these editorial changes affect either the methodology used in the calculation or the calculation's results.

Entergy has initiated a condition report to address the above items. Upon completion of the corrective action review that will close out the condition report, the calculations of record will be revised.

As noted above, the conclusion that the  $CUF_{en}s$  for both nozzles are less than unity is not affected by the changes discussed in this letter.

Sincerely,

Matias F. Travieso-Diaz Counsel for Entergy

cc: Service List

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing letter were served on the persons listed below by deposit in the U.S. Mail, first class, postage prepaid; where indicated by an asterisk, by electronic mail; and where indicated by a double asterisk, by both overnight and electronic mail, this 26<sup>th</sup> day of February, 2009.

\*Administrative Judge Alex S. Karlin, Esq., Chairman Atomic Safety and Licensing Board Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 ask2@nrc.gov

\*Administrative Judge Dr. William H. Reed 1819 Edgewood Lane Charlottesville, VA 22902 whrcville@embarqmail.com

\*Office of Commission Appellate Adjudication Mail Stop O-16 C1 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 OCAAmail@nrc.gov

\*\*Lloyd Subin, Esq.
\*\*Mary Baty, Esq.
\*\*Susan L. Uttal, Esq.
Office of the General Counsel
Mail Stop O-15-D21
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
LBS3@nrc.gov; mcb1@nrc.gov;
jessica.bielecki@nrc.gov; susan.uttal@nrc.gov

\*Administrative Judge Dr. Richard E. Wardwell Atomic Safety and Licensing Board Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 rew@nrc.gov

\*Secretary Att'n: Rulemakings and Adjudications Staff Mail Stop O-16 C1 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 secy@nrc.gov, hearingdocket@nrc.gov

Atomic Safety and Licensing Board Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

\*\*Sarah Hofmann, Esq. Director of Public Advocacy Department of Public Service 112 State Street – Drawer 20 Montpelier, VT 05620-2601 Sarah.hofmann@state.vt.us \*\*Anthony Z. Roisman, Esq. National Legal Scholars Law Firm 84 East Thetford Road Lyme, NH 03768 <u>aroisman@nationallegalscholars.com</u>

\*Peter L. Roth, Esq. Office of the New Hampshire Attorney General 33 Capitol Street Concord, NH 03301 <u>Peter.roth@doj.nh.gov</u>

\*Matthew Brock, Esq. Assistant Attorney General Environmental Protection Division Office of the Attorney General One Ashburton Place, 18th Floor Boston, MA 02108 <u>Matthew.Brock@state.ma.us</u> \*\*Raymond Shadis 37 Shadis Road PO Box 98 Edgecomb, ME 04556 shadis@prexar.com

\*Zachary Kahn, Esq. Atomic Safety and Licensing Board Panel Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 zachary.kahn@nrc.gov

Matias F. Travieso-Diaz