



Entergy Nuclear Operations, Inc.
Entergy Nuclear Northeast
440 Hamilton Avenue
White Plains, NY 10601
Tel: 914-272-3370

John F. McCann
Vice President, Nuclear Safety,
Emergency Planning and Licensing

BVY 10-012

February 22, 2010

Brian Holian
Director of License Renewal
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Vermont Yankee License Renewal
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

REFERENCES:

1. Letter, John F. McCann to Brian Holian, "Vermont Yankee License Renewal," BVY 10-010 dated February 2, 2010
2. Letter, J.H. Marshall (Downs, Rachlin, Martin, PLLC) to S. M. Hudson (Vermont Public Service Board), Affidavit of Norm Rademacher, Director of Engineering at the Vermont Yankee Nuclear Power Station, dated January 24, 2010

Dear Mr. Holian:

In Reference (1), Entergy Nuclear Operations, Inc. (ENO) informed the NRC that we would perform a review of the Vermont Yankee license renewal application (LRA) and associated correspondence to confirm the accuracy of statements that ENO made relating to buried piping at Vermont Yankee Nuclear Power Station (VY). ENO's review confirms that ENO's statements describing the buried piping and tanks subject to aging management review (AMR) were accurate.

To provide the proper context for the discussion that follows, it should be recognized that LRA Section 2, "Structures and Components Subject to Aging Management Review," identifies the structures and components within the scope of the NRC license renewal rules and subject to AMR. Section 3 of the LRA, "Aging Management Review Results," provides the results of the AMR only for those structures and components subject to AMR. Sections 2 and 3 of the SER discuss the NRC staff review of the corresponding LRA sections.

First, the information in the LRA concerning systems with buried piping was compared to the buried piping sections at VY as identified in the Affidavit of Norm Rademacher, Director of Engineering at the Vermont Yankee Nuclear Power Station (Reference 2).¹ This comparison confirmed that the LRA correctly identified all buried piping that falls within the scope of license renewal and is subject to AMR.

¹ The Affidavit of Norm Rademacher was prepared in response to the Vermont Public Service Board's request for the identification of all buried piping sections at VY.

Second, ENO reviewed correspondence associated with the LRA that contained information about buried piping and tanks to verify that information given to the NRC concerning buried piping and tanks was correct. As part of the correspondence review, ENO looked at the information submitted through RAIs and the responses to NRC questions during audits and inspections.

Our records indicate that no formal RAIs on buried piping and tanks were issued because the NRC's questions concerning buried piping and tanks and the buried piping inspection program were answered during the audit and regional inspections. Therefore, ENO verified that the information submitted to the NRC staff in the license renewal question-and-answer database during the audits and inspections was correct.

As a final check for completeness, we reviewed NRC documents to verify that those documents were consistent with the information ENO provided to the NRC. The review included the NRC's audit report on aging management programs, the NRC's regional license renewal inspection report, and the VY final license renewal Safety Evaluation Report (SER). During the review of these NRC documents, we identified two items that we would like to bring to your attention. Neither of these two items affect the determination of components subject to AMR or the adequacy of the aging management programs. We simply offer clarification since the statements might present confusion if taken out of the context of the discussion of AMR results for structures and components subject to AMR.

The first item is LRA Section 3.3.2.2.10, "Loss of material Due to Pitting and Crevice Corrosion," Item 7, which is quoted in the corresponding section of the SER. It states, "Loss of material due to pitting and crevice corrosion could occur for stainless steel piping, piping components, and piping elements exposed to soil. At VYNPS there are no stainless steel piping components exposed to soil in the auxiliary systems." Because Section 3 of both the LRA and SER is discussing the evaluation of components determined in Section 2 to be subject to AMR, this statement is correct in the context of the components being discussed (i.e., those subject to AMR). There are stainless steel piping components exposed to soil in the auxiliary systems at VY, but these components do not fulfill license renewal intended functions and are therefore not subject to AMR.

The second item involves SER Section 3.0.3.2.1 "Buried Piping Inspection Program," which quotes from the LRA: "There are no buried steel tanks subject to an AMR." This statement is correct. There are no steel tanks subject to AMR exposed to soil. The SER then attributes to the applicant the statement that "the only below-grade tank at VYNPS that is below grade is the diesel fire pump tank, which is in a vault, so it is not exposed to a soil environment." This sentence is properly understood in context as referring to metal tanks, since the SER was discussing whether there were any buried steel tanks, and the very next sentence reflects the presence of a below-grade fiberglass tank. That sentence states, "The only buried tank at VYNPS is the John Deere Diesel tank, which is fiberglass." Again, the discussion in Section 3 of the SER is limited to structures and components within the scope of license renewal and subject to AMR. The John Deere Diesel (fuel oil) tank is the only buried tank that *is subject to AMR*. There are other buried tanks on site that are not subject to AMR (i.e., the plant support building fuel oil tank and TK-AUTO-GAS and TK-AUTO-DIESEL for refueling vehicles) and are therefore not relevant to this section of the SER.

There are no new regulatory commitments made in this letter.

Should you have any questions concerning this submittal, please contact me at 914-272-3370 or Garry Young at 601-368-5208.

Sincerely,



[JFM/JTM]

cc: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Samuel J. Collins, Region 1 Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. James S. Kim, Project Manager
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

USNRC Resident Inspector
Vermont Yankee Nuclear Power Station
320 Governor Hunt Road
Vernon, VT 05354

Mr. David O'Brien, Commissioner
VT Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601