**From:** Guzman, Richard
**To:** "Devincentis, James M"
**Subject:** VYNPS Proposed AMD to OL Condition 3.S - BWRVIP-139-A - Request for Additional Information
**Date:** Thursday, May 31, 2012 1:24:00 PM

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Jim,

As we discussed, the NRC staff has reviewed the information provided in the subject license amendment request dated December 22, 2011 (ADAMS Accession No. ML11363A049) and the supplemental information provided during the May 1, 2012 audit, and has determined that additional technical justification is still needed to support the review of the proposed license amendment. Below is the NRC staff's request for additional information. To support the timely review of this application, we request that you provide a formal response within 30 days of the date of this request. We can have a teleconference call to discuss any clarifications you may have prior to providing your supplemental response to this RAI request. Please propose some dates/times for the call and I'll check availabilities on my end. Please contact me if you have any questions.

By letter dated December 22, 2011, Entergy Nuclear Operations Inc. (Entergy or the licensee) submitted a license condition change requesting the usage of the inspection requirements allowed by the BWRVIP-139-A topical report (TR), "BWR Vessel and Internals Project Steam Dryer Inspections and Flaw Evaluation Guidelines," at Vermont Yankee (VY) nuclear power plant. In the technical evaluation section of its submittal, the licensee stated that the steam dryer was inspected during previous refueling outages and these inspections did not identify any unacceptable fatigue induced structural flaws. Consistent with the requirements addressed in Section 5.3.4 of the BWRVIP-139-A, the licensee's proposed change includes adoption of the re-inspection frequency of the steam dryer at every seven refueling outages based on 18 month cycle.

As indicated in Section 5.3.4 of the BWRVIP-139-A, "Re-inspection Recommendations," licensees must justify any adjustments to steam dryer inspection programs when commitments exist to implement the re-inspection provisions of General Electric (GE) Service Information Letter (SIL) No. 44, "BWR steam dryer integrity." Accordingly, the NRC staff requests that the licensee submit a robust technical justification that demonstrates that the existing flaws would not cause any detrimental effect on the functionality and the structural integrity of the steam dryer. This justification shall encapsulate the following information which is to be derived from the consecutive inspections conducted during the 2007, 2008 and 2010 refueling outages:

(a) Length of the indications - average length of the flaws/relevant indications;

(b) Distribution of indication per unit area - random, concentrated at high stress locations, at the heat affected zone (HAZ);

(c) Characterization of the relevant indications/flaws,

(d) Engineering disposition of the relevant indications (> 1/16”) based on the loading conditions,

(e) Locations of cracks i.e., fatigue cracks and/or IGSCC and maximum length of the cracks.

The expectations are that the licensee should demonstrate that compliance with the requirements (i.e., the re-inspection frequency at every seven refueling outages based on 18 month cycle ) addressed in the BWRVIP-139-A report is adequate to maintain the functionality and structural integrity of the steam dryer.

As part of its response to the information requested above, in a teleconference call with the NRC staff on February 8, 2012, the licensee requested that the NRC staff review the summary of results related to the inspections that were performed on the steam dryer during the refueling outage (RFO) outage cycles - RFO 26, 27 and 28. Furthermore, the licensee requested the NRC staff to review the technical justification (proprietary document) provided by GE. The NRC staff reviewed the inspection summary results and the related GE reports and determined that there is insufficient technical justification to support the proposed change to the license. The information requested above has not been completely addressed; therefore, the staff requests the licensee to supplement its application to address the questions outlined above.

**Rich Guzman**

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