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Christopher J. Wamser
Site Vice President

BVY 13-071

August 7, 2013

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Supplemental Information Regarding Inservice Inspection Program for
the Fifth Ten-Year Interval and Relief Request ISI-05
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

REFERENCES:

1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Inservice Inspection Program for the Fifth Ten-Year Interval," BVY 13-018, dated March 27, 2013
2. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Response to Request for Additional Information Regarding Relief Request ISI-05," BVY 13-052, dated June 12, 2013

Dear Sir or Madam:

This letter provides supplemental information regarding the Vermont Yankee Nuclear Power Station (VY) Inservice Inspection (ISI) program for the fifth ten-year interval that was submitted by Entergy Nuclear Operations, Inc. on March 27, 2013 (Reference 1). The supplemental information is based on questions raised during teleconferences held with NRC staff on July 30, 2013 and August 5, 2013. Specifically, this letter provides a revised description of the VY shock suppressor (snubber) program to clarify the ASME Code Edition/Addenda used in the fifth ten-year interval. Deletions are shown in strikethrough and additions are shown in underline format. The revised snubber program description is provided in Enclosure 1.

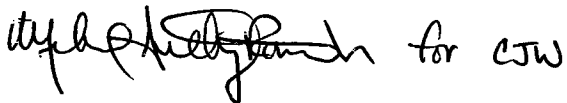
Reference 1 also included five relief requests associated with the fifth ten-year ISI interval. Relief request ISI-05 proposed to maintain and perform certain ISI related activities in accordance with the ASME Section XI 2001 Edition through the 2003 Addenda requirements. ISI-05 was revised in Reference 2 and is now being revised to add footnote 7 to the table containing the proposed ASME Section XI Code of Record for VY (Attachment 1 of ISI-05). New footnote 7 explains that snubber pre-service and in-service inspection and testing requirements are implemented in subsection ISTD of the OM Code, 2004 Edition through 2006 Addenda in its entirety. Additional changes are made throughout the table to ensure references to Code Addenda are inclusive of all existing and approved versions. Changes are shown in strikethrough/underline format. Enclosure 2 contains revised relief request ISI-05.

A047
NRR

This letter contains no new regulatory commitments.

Should you have any questions concerning this letter or require additional information, please contact Mr. Coley Chappell at 802-451-3374.

Sincerely,

Handwritten signature in black ink, appearing to read "CJW".

CJW/plc

Enclosures: 1. Snubber Program Description for the Fifth Ten-Year Interval
2. Relief Request ISI-05, Maintaining Certain ISI Related Activities on the 2001 Edition through 2003 Addenda ASME Section XI Code

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Enclosure 1

Vermont Yankee Nuclear Power Station

Snubber Program Description for the Fifth Ten-Year Interval



For convenience, the Ten-Year ISI Program also contains augmented examinations that are outside the scope of 10 CFR 50.55a. These examinations may result from activities including, but not limited to, commitments made to the NRC outside the scope of 10 CFR 50.55a, internal commitments, License Renewal commitments, or industry initiatives. These examinations may use ASME Section XI techniques and procedures as defined in the commitment, however, the requirements of ASME Section XI, including reporting, do not apply. These augmented examinations are not required by the ASME Code and are not included in the summary totals for the specific examination category.

The Ten-Year ISI Program schedule is contained in the IDDEAL Software Suite® ScheduleWorks® computer database. This information is retained at the plant site and is available for review.

1.5.2 Repair and Replacement Program Description

ASME Section XI requirements for repairs and replacements are not contained in this plan. SEP-RR-VTY-001 "Vermont Yankee Section XI Repair/Replacement Program" and Corporate procedure CEP-R&R-001 "ASME Section XI Repair/Replacement Program" are the implementing procedures which describes the implementation process for the repair and replacement provisions of ASME Code, Section XI, Article IWA-4000.

1.5.3 Snubber Program Description

The Snubber Program requirements are not contained in this plan. The VYNPS Snubber Program is contained in SEP-SNB-007 "Vermont Yankee Shock Suppressors (Snubbers) Program Section" satisfies the requirements of ISTD of the OM Code 2004 Edition through /20056 Addenda in lieu of IWF-5000 as permitted by 10 CFR 50.55a(b)(3)(v) except that preservice and inservice examinations must be performed using the VT-3 visual examination method described in IWA-2213. Snubber support hardware such as lugs, bolting, pins, clamps, and structural steel between the snubber pin and the pressure retaining item and between the snubber pin and the building steel are included in the support population and examined in accordance with Subsection IWF per this Program Section.

1.5.4 Pressure Test Program Description

ASME Section XI requirements for pressure testing are not contained in this plan. ENN-SEP-PT-001 "Vermont Yankee Inservice Inspection Pressure Testing (PT)

Enclosure 2

Vermont Yankee Nuclear Power Station

Relief Request ISI-05, Maintaining Certain ISI Related Activities on the 2001 Edition through
2003 Addenda ASME Section XI Code

Vermont Yankee Nuclear Power Station
10 CFR 50.55a Request No. ISI-05
Revised Proposed Alternative in Accordance With 10 CFR 50.55a(a)(3)(i)
Maintaining ISI Related Activities on the 2001E through /2003A ASME Section XI
Code

1. ASME Code Component(s) Affected

Code Class:	ASME Code Class 1, 2, 3, and MC components and component supports
Component Numbers:	Various
Code References:	ASME Section XI, 2007 Edition with 2008 Addenda ASME Section XI, 2001 Edition with 2003 Addenda
Examination Category:	Various
Item Number(s):	Various
Unit/Inspection Interval	Vermont Yankee / Fifth 10-year interval September 1, 2013 – August 31, 2023

2. Applicable ASME Code Requirements

Entergy is required to update the Vermont Yankee Nuclear Power Station (VY) 120-month Inservice Inspection (ISI) Program to the latest Edition and Addenda of the ASME B&PV Code, Section XI, as approved by the NRC in 10 CFR 50.55a(b)(2), for the fifth interval.

Pursuant to 10 CFR 50.55a(b)(2), references to Section XI refer to Section XI, Division 1, of the ASME Boiler and Pressure Vessel Code, and include the 1970 Edition through the 1976 Winter Addenda, and the 1977 Edition through the 2007 Edition with the 2008 Addenda, subject to the following conditions.

Pursuant to 10 CFR 50.55a(g)(4), "Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) which are classified as ASME Code Class 1, Class 2, and Class 3 must meet the requirements, except design and access provisions and preservice examination requirements, set forth in Section XI of editions and addenda of the ASME B&PV Code (or ASME OM Code for snubber examination and testing) that become effective subsequent to editions specified in paragraphs (g)(2) and (g)(3) of this section and that are incorporated by reference in paragraph (b) of this section, to the extent practical within the limitations of design, geometry and materials of construction of the components."

According to the 10 CFR 50.55a(g)(4)(ii), "Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months before the start of the 120-month inspection interval (or the optional ASME Code cases listed in NRC Regulatory Guide 1.147, Revision 16, when using Section XI; or Regulatory Guide 1.192 when using the OM Code, that are incorporated by reference in paragraph (b) of this section), subject to the conditions listed in paragraph (b) of this section. However, a licensee whose inservice inspection interval commences during the 12 through 18-month period after July 21, 2011 may delay the update of their Appendix VIII program by up to 18 months after July 21, 2011."

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3. Reason for Request

Entergy proposes an alternative to the requirements of 10 CFR 50.55a(b)(2), 10 CFR 50.55a(g)(4), and 10 CFR 50.55a(g)(4)(ii); specifically, to update the VY ISI program to the 2007 Edition with the 2008 Addenda while maintaining and performing ISI related activities such as repair/replacements (R&R), pressure testing (PT), and non-destructive examination (NDE) to the current ASME Section XI 2001 Edition through the 2003 Addenda requirements.

4. Proposed Alternative and Basis for Use

Proposed Alternative

Pursuant to 10 CFR 50.55a(a)(3)(i), Entergy requests authorization to maintain the current use of 2001 Edition through the 2003 Addenda for the performance of R&R, PT, and NDE subject to the conditions contained in 10 CFR 50.55a. In implementing this proposal, Entergy will continue to comply with all NRC conditions, limitations, and restrictions as specified in 10 CFR 50.55a for 2001 Edition with 2003 Addenda of ASME Section XI Code. Code Cases will also be adopted per RG 1.147 for those cases applicable to the 2001 Edition through the 2003 Addenda. However, this request does not apply to the ISI examinations and tests at VY.

In accordance with 10 CFR 50.55a(g)(4)(ii), the Code of Record for the ISI Program will be the 2007 Edition with 2008 Addenda with the selection, planning, and scheduling of ISI examinations and tests as defined in IWB-, IWC-, IWD-, IWE-, and IWF-2500 or NRC approved ISI alternatives being performed accordingly.

Entergy has proposed specific details in Attachment 1 regarding the use of or reference to "Articles" (e.g. IWA-4000, IWA-5000) from every "Subsection" (e.g. IWA, IWB, etc) of the 2001 Edition with 2003 Addenda for the performance of R&R, PT, and NDE activities and the 2007 Edition through 2008 Addenda for the ISI Program selection, planning, and scheduling of ISI examinations and tests.

Basis for Use

On September 1, 2013, the VY ISI Program will be updated to the fifth ten year interval in accordance with 10 CFR 50.55a(g)(4)(ii). While the ISI related activities such as R&R, PT, and NDE would normally be included as part of the update to the 2007 Edition and 2008 Addenda of ASME Section XI, the proposed alternative is to maintain the ISI related activities in compliance with ASME Section XI 2001 Edition through the 2003 Addenda, while conforming to all conditions of 10 CFR 50.55a.

Entergy has standardized the performance of ISI related activities such as R&R, PT, and NDE across its entire nuclear fleet to the ASME Section XI 2001 Edition through the 2003 Addenda. While ISI Program plans are controlled on a site-by-site basis, the R&R, PT, and NDE programs are administered under a corporate set of procedures. With Entergy being

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required to update the VY ISI, R&R,PT, and NDE program activities to the 2007 Edition with the 2008 Addenda in accordance with 10 CFR 50.55a(b), this will require establishing and

maintaining two different programs; one for VY and one for the other ten (10) Entergy nuclear stations.

Although the 2007 Edition made changes to Section XI, these changes were not necessary to ensure an acceptable level of quality and safety. Nor were these changes made to address a deficiency in the Code that adversely impacted safety. In the latest revision to 10 CFR 50.55a, the NRC did not mandate that other plants that have adopted earlier edition and addenda follow any of the new paragraphs in the 2007 Edition.

Pursuant to 10 CFR 50.55a(b)(3)(v), this relief request is not applicable to the snubber program because VY will use the ASME Operation and Maintenance Code for snubber inservice inspection and testing. Section 1.5.3 of the fifth ten-year inservice inspection program provides additional information on the snubber program.

Entergy believes that maintaining the VY ISI related activities to the 2001 Edition through the 2003 Addenda standard with the other Entergy plants will improve the level of quality and safety at VY. This allows leveraging the knowledge from the ten other nuclear stations of ISI related activities to provide VY with a wealth of experience to draw on as well as minimizing the time spent on developing and maintaining procedures that are different from the rest of the Entergy fleet. Therefore, this proposed alternative provides an acceptable level of quality and safety, commensurate with the provisions of 10 CFR 50.55a(a)(3)(i).

5. Duration of Proposed Alternative

The fifth interval of ISI at VY begins on September 1, 2013 and ends on August 31, 2023. However, with eight nuclear operating stations starting new 10-year inservice inspection intervals between June 2015 and December 2017, Entergy proposes to maintain standardization of the corporate administered R/R, PT, and NDE programs across its entire nuclear fleet at the 2001 Edition through 2003 Addenda through December 2017. Prior to December 31, 2017, Entergy will request NRC approval to update these ASME Section XI activities to the latest ASME code edition incorporated by reference in 10 CFR50.55a for the entire fleet. Therefore, the proposed duration of this alternative is from September 1, 2013 through December 31, 2017.

6. Precedents

This request is similar in nature to the following requests for alternatives, in that, Entergy nuclear stations were granted use of 2001 Edition through 2003 Addenda for ISI related activities such as R&R, PT, and NDE with the Code of Record for the ISI Program being a different Code edition.

- "Relief Request ISI-2008-1, Use of Later Edition and Addenda of ASME Code, Section XI for Repair and Replacement, Pressure Testing, and Non-Destructive Testing Activities -Vermont Yankee Nuclear Power Station (TAC NO. ME0239)," dated April 30, 2009 [ADAMS Accession No. ML091170111]

Vermont Yankee Nuclear Power Station
10 CFR 50.55a Request No. ISI-05
Revised Proposed Alternative in Accordance With 10 CFR 50.55a(a)(3)(i)
Maintaining ISI Related Activities on the 2001E through /2003A ASME Section XI
Code

- "Relief Request ISI-2008-1, Use of Later edition and addenda of asme code, section xi for repair and replacement, pressure testing, and- destructive testing activities -Pilgrim Nuclear Power Station (TAC NO. ME0238), dated April 30, 2009 [ADAMS Accession No. ML091130456]

- Arkansas Nuclear One, Unit 2 - ISI-2007-1, Request to Use a Later Edition and Addenda of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (TAC NO. MD6603, dated December 20, 2007 [ADAMS Accession No. ML073390442]

REQUEST ISI-05

ATTACHMENT 1

**PROPOSED ASME SECTION XI CODE OF RECORD
FOR VERMONT YANKEE INSERVICE INSPECTION 5TH 10-YEAR INTERVAL**

PROPOSED ASME SECTION XI CODE OF RECORD FOR VY

ASME Section XI Code Provision		ASME Section XI Code Edition/Addenda ¹		
Sub-section	Article	2001 Edition/ No Addenda	2001 Edition/ through 2003 Addenda	2007 Edition and/ 2008 Addenda
IWA-General Requirements	IWA-1000		X	
	IWA-2000		X ²	X ²
	IWA-3000		X	
	IWA-4000		X ³	
	IWA-5000		X	
	IWA-6000		X	
	IWA-9000		X	
IWB-Req'ts for Class 1 Components	IWB-1000			X ⁴
	IWB-2000			X ⁴
	IWB-3000		X ⁶	
	IWB-5000		X	
IWC-Req'ts for Class 2 Components	IWC-1000			X ⁴
	IWC-2000			X ⁴
	IWC-3000		X	
	IWC-5000		X	
IWD-Req'ts for Class 3 Components	IWD-1000			X ⁴
	IWD-2000			X ⁴
	IWD-3000		X	
	IWD-5000		X	
IWE-Req'ts for Class MC Components	IWE-1000			X ⁴
	IWE-2000			X ⁴
	IWE-3000		X	
	IWE-5000		X	
IWF-Req'ts for Class 1, 2, 3, and MC Supports	IWF-1000			X ⁴
	IWF-2000			X ⁴
	IWF-3000		X	
	IWF-5000		X ²	
IWL-Req'ts for Class CC Components	IWL-1000			X ⁵
	IWL-2000			X ⁵
	IWL-3000			X ⁵
	IWL-5000			X ⁵
Mandatory Appendices	I		X	
	II		X	
	III		X	
	IV		X	
	V		x	
	VI		X	
	VII		X	
	VIII	X		
	IX		X	
	X			X ⁴

Notes:

- (1) Entergy will also comply with all NRC conditions, limitations, and restrictions specified in 10 CFR 50.55a.
- (2) VY is proposing to use IWA-2100, 2200, and 2300 from the 2001 Edition/through 2003 Addenda for requirements applicable to authorized inspection, examination methods, and qualification of NDE personnel. However, VY will use the 2007 Edition/and 2008 Addenda of the 2007 Edition/and 2008 Addenda when using IWA-2400, 2500, 2600 for the selection, planning, and scheduling of ISI examinations and tests.
- (3) As exceptions to IWA-4000 of the 2001 Edition/2003 Addenda, VY will comply with the alternatives listed below to comply with NRC restrictions in 10 CFR.55a:
 - The NDE provision in IWA-4540(a)(2) of the 2001 Edition/and 2002 Addenda will be applied when performing system leakage tests after repair/replacement activities involving welding or brazing to comply with 10 CFR 50.55a(b)(2)(xx)(B).
 - Pressure testing of mechanical joints of Class 1, 2, and 3 items will be performed in accordance with IWA-4540(c) of the 1998 Edition/No Addenda to comply with 10 CFR 50.55a(b)(2)(xxvi).
- (4) The selection, planning, and scheduling of ISI examinations/tests will comply with these ASME Section XI articles (e.g. IWB-1000 and 2000) from the 2007 Edition/and 2008 Addenda or applicable NRC approved alternatives that are specified in the VY ISI Program Plans.
- (5) VY does not have a Class CC Containment. Therefore, the requirements of Subsection "IWL" do not apply for this site.
- (6) Entergy will not apply the IWB-3514 acceptance standards of the 2001 Edition through /2003 Addenda to planar surface flaws in UNS N06600, N06682, or W86182 materials or austenitic stainless steels which are subject to stress corrosion cracking. Therefore, if a flaw is found in an ASME Class 1 austenitic stainless steel weld, Entergy would either evaluate the acceptability of the flaw in accordance with IWB-3600 or correct the flawed condition by performing an approved ASME Section XI repair/replacement activity.
- (7) As required by 10 CFR 50.55a(b)(3)(v), snubber pre-service and in-service inspection and testing requirements are implemented in subsection ISTD of the ASME Operation and Maintenance (OM) Code, 2004 Edition through 2006 Addenda in its entirety.