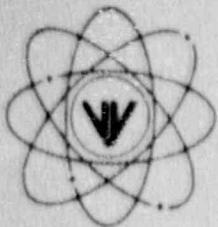


# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

BVY 90-026

REPLY TO  
ENGINEERING OFFICE  
580 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

March 8, 1990

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, USNRC to VYNPC, NRY 88-09 (Generic Letter 88-01),  
dated 1/25/88  
c) Letter, VYNPC to USNRC, FVY 88-62, dated 7/27/88  
d) Letter, USNRC to VYNPC, BVY 90-026, dated 2/14/90

Dear Sir:

Subject: Vermont Yankee Position Concerning Leakage  
Detection as Required by Generic Letter 88-01

In response to the concerns stated in your letter [Reference d)], the following supplemental information is provided to clarify Vermont Yankee's position regarding leakage detection and conformance with Position C of Regulatory Guide 1.45.

ITEM Plant shutdown should be initiated for inspection and corrective action when, within any period of 24 hours or less, any leakage detection system indicates an increase in rate of unidentified leakage in excess of 2 gpm or its equivalent, or when the total unidentified leakage attains a rate of 5 gpm or equivalent, whichever occurs first. For sump level monitoring systems with fixed-measurement-interval methods, the level should be monitored at approximately 4-hour intervals or less.

## Response

Existing administrative controls at Vermont Yankee currently require compliance with the intent of this position. Specifically, procedure OP 4152 contains the following requirement:

With any increase in unidentified leakage of >2 gpm, averaged over the previous 24-hour period, identify the source of leakage or be in at least hot shutdown in 12 hours and in cold shutdown in the next 24 hours.

The Vermont Yankee Technical Specifications require the plant to be in cold shutdown within 24 hours if unidentified reactor coolant system leakage exceeds 5 gpm.

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The above procedure also requires the unidentified leakage rate to be calculated once each shift. We note that the Safety Evaluation provided by the NRC allows this monitoring to be conducted every 8 hours instead of every four hours as required by Generic Letter 88-01. We feel that our existing once-per-shift requirement meets the intent of the Generic Letter and SER.

ITEM For plants operating with any IGSCC Category D, E, F, or G welds, at least one of the leakage measurement instruments associated with each sump shall be operable, and the outage time for inoperable instruments shall be limited to 24 hours, or immediately initiate an orderly shutdown.

Response

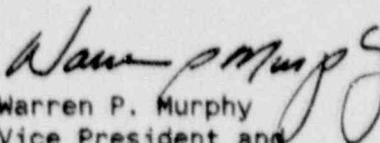
Vermont Yankee Technical Specifications require both the sump and air sampling systems to be operable during power operation. Both of these systems constitute the "measurement instruments" used to indicate primary coolant system leakage. If one of these systems is inoperable, continued operation is permissible only during the succeeding seven days. If both systems are inoperable, these Technical Specifications require the plant to initiate an orderly shutdown and to be in cold shutdown within 24 hours. Note that continued power operation is not allowed with both systems inoperable, thus this requirement is more restrictive than the requirements of Generic Letter 88-01.

In conclusion, we believe that the combination of existing Technical Specifications and administrative controls fully comply with the intent of the Staff's position on coolant leakage. As such, no changes to the existing Technical Specifications are warranted. A specific reference to this Generic Letter has been added to the applicable procedure to prevent these requirements from being deleted in the future.

We trust that this information addresses your concerns. Should you require additional information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and  
Manager of Operations

/dm  
cc: USNRC Regional Administrator, Region I  
USNRC Resident Inspector, VYNPS  
USNRC Project Manager, VYNPS