



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

November 28, 1990

Docket No. 50-271

Mr. George Sterzinger, Commissioner
Department of Public Service
State of Vermont
120 State Street
State Office Building
Montpelier, Vermont 05602

Dear Mr. Sterzinger:

I am pleased to respond to your August 22, 1990 letter regarding Vermont Yankee License Amendment No. 115. In your letter you asked how we considered your comments of February 9, 1990 that you made in response to the original amendment request and asked how we resolved each of the specific comments.

First let me apologize for the delay in responding to your letter. In our review process we take comments, such as you provided, and evaluate them to see if they are applicable to the amendment request that is being considered. In this particular case the comments you provided, were in our view, related to the broad considerations of the NRC approved Leak Test Program used to satisfy the requirements of 10 CFR 50 Appendix J and not specifically applicable to the licensee's request. Our evaluation of each of your specific comments is provided below.

Comment Number 1:

If approval is granted to remove valves RHR-32, RHR-33 and Valve 10-29 from Table 4.7.2.b, the penetration should be listed on Table 4.7.1 and made subject to Type B testing.

Response to Comment 1:

As your letter stated, the valves are in the table of isolation valves that are not subject to Type C leakage tests. This penetration was exempted from Type B leakage tests by our letter dated August 19, 1983. The bases for the exemption is that the valves are in a seismically qualified line, totally contained within the reactor building, that includes a loop seal with an assured 30-day water supply such that no single active failure can preclude the continuous availability of this water to the seal. Consequently, any leakage past these valves would be safely controlled in an extension of the containment and we therefore concluded that it was not necessary to require Type B testing.

Comment Number 2:

The relationship between Tables 4.7.2.a and 4.7.2.b, and their consistency with FSAR Table 5.2.2 is unclear. No Bases is provided to explain why any of the valves listed in Table 4.7.2.b are excluded from Type C Tests. A number of valves are identified in FSAR Table 5.2.2 as containment isolation valves which do not appear in either Tables 4.7.2.a or 4.7.2.b.

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Response to Comment 2:

FSAR Table 5.2.2 lists only principal penetrations and is not intended as a comprehensive list, thus there are penetrations listed in TS Tables 4.7.2 that do not appear in FSAR Table 5.2.2. The leak testing program at Vermont Yankee includes all the components and tests required by 10 CFR 50 - Appendix J. The bases for the valves not subject to Type C test and listed in Table 4.7.2.b are provided by the Vermont Yankee Leak Rate Testing Program. The program was approved by the NRC in our letter dated August 19, 1983.

Comment Number 3:

Technical Specifications 3.7.D.1, 4.7.D.1.a(1), 3.7.D.2, and 4.7.D.2 refer to Table 4.7.2 which does not exist. This should be corrected with the proposed modification.

Response to Comment 3:

The reference to "Table 4.7.2" means both Table 4.7.2.a and Table 4.7.2.b. This is clearly understood by the licensee. While there is no stand alone Table 4.7.2 it has not caused any misunderstanding by licensee staff nor NRC personnel.

I trust this letter is responsive to and clarifies our disposition of your comments. We gave your concerns careful consideration and appreciate the efforts you took in preparing your two letters. Should you have any further questions please contact the Project Manager for the Vermont Yankee Nuclear Power Station, Mr. Morton B. Fairtile at (301) 492-1435, or myself at (301) 492-1434.

Sincerely,

Original signed by
Curfis J. Cowgill III, Acting Director
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

LA:PDI-3
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AS/90

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PD:PDI-3
CJCowgill
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03-116

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Adjudicatory File (2)
Atomic Safety and Licensing Board
Panel Docket
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Robert M. Lazo, Chairman
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. L. A. Tremblay Vermont Yankee

cc:

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

Jerry R. Kline
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Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

11/28/90
~~11/23/90~~
11/2/90
~~10/24/90~~
~~10/09/90~~

FROM: GEORGE STERZINGER
STATE OF VERMONT

ORIGINAL DUE DT: ~~09/26/90~~

TICKET NO: 0909189
DOC DT: 08/22/90
NRR RCVD DATE: 09/05/90

TO: MORTON FAIRTILE

FOR SIGNATURE OF: ** YEL **

~~NEBBE~~ WESSMAN

DESC: STATE OF VERMONT COMMENTS IN ACCORDANCE WITH
10 CFR 50.91

ROUTING:
MURLEY
MIRAGLIA
PARTLOW
RUSSELL
GILLESPIE
TANA

ASSIGNED TO: DRFR CONTACT: VARGA

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If the due date does not allow adequate time to respond to this ticket, you may request a revised due date. The request must have prior approval from the appropriate Associate Director or NRR Deputy Director and must include a valid justification. Contact NRR mailroom with the new due date (Celeste Smyre, ext-21229).

Please do not carry concurrence packages to Directors office without first going through the NRR mailroom.