VERMONT YANKEE NUCLEAR POWER CORPORATION



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April 28, 1992 BVY 92-48

United States Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, DC 20555

References: (See Attachment A)

Subject: Correction to Generic Letter 89-10, Supplement 3 Responses

Dear Sir:

Reference (i) transmitted Supplement 3 to Generic Letter 89-10 to Vermont Yankee. This letter required that a 30 day and a 120 response be submitted to NRC. These requirements were fulfilled via References (j) and (k). NRC forwarded a request for additional information regarding Vermont Yankee's Supplement 3 responses via Reference (l). Vermont Yankee responded to the request for additional information via Reference (m).

It was recently discovered that a correction is needed to accurately describe the status of recirculation bypass valves V2-54A and V2-54B, and RCIC valve V13-15. This correction applies to information supplied by Vermont Yankee in References (k) and (m).

Recirculation Bypass Valves V2-54A and V2-54B

Our response, References (k) and (m), to the information requests related to Supplement 3 of Generic Letter 89-10 [Reference (i) and (l)] indicated that valves V2-54A and V2-54B have torque switch bypasses set at 99% of valve travel. During the recently completed 1992 refueling outage, Vermont Yankee discovered the torque switches on these valves had not been bypassed to 99% of valve stroke. The torque switch bypass for these valves were set at 80% of valve stroke. An evaluation has been performed that concludes valves V2-54A and V2-54B would have closed under all design basis conditions with the torque switch bypasses at 80% of valve travel. This evaluation has confirmed our conclusion that no satety significant deficiency existed on these valves. During the recently completed outage, a torque switch bypass to 99% of valve stroke was implemented for these valves to provide additional margin for closure under design basis conditions. With the changes made during the 1992 outage, it is submittals of References (k) and (m) accurately reflect the status of valves V2-54A and V2-54B.

ACKY!

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RCIC Valve V13-15

Reference (m) indicated that the torque switch on valve V13-15 was bypassed to 99% of valve stroke to ensure that the valve would close under all design basis conditions. The torque switch for this valve had been previously bypassed to 99% of valve stroke to ensure valve closure. However, in late 1990 the torque switch bypass to 99% of valve stroke for this valve became unnecessary and the valve was set up normally, with the bypass at 80% of valve stroke. This was as a result of the valve actuator being modified from a 2-rotor to a 4-rotor design and a heavy duty spring pack being installed allowing the actuator to develop more thrust. This allowed the actuator to ensure valve closure without bypassing the torque switch to 99% of valve stroke. These valve actuator improvements were not fully taken into account in the submittal of Reference (m). The conclusion that no safety significant deficiency existed with regard to this valve remains valid.

The purpose of this letter is to make the above noted corrections to our previously submitted responses to Supplement 3 of Generic Letter 89-10. At no time were these valves configured in such a manner such as to prevent proper valve operation under all design basis conditions. At no time did a safety significant deficiency exist. Vermont Yankee's commitments with regard to Generic Letter 89-10 remain unchanged. In addition, we are performing a root cause analysis on the cause of supplying incorrect information in these NRC submittals.

Should you have further questions or require additional information, please contact this office.

Very truly yours,

Vermont Yankee Nuclear Power Corporation

James P. Pelletier

Vice President, Engineering

Attachment

cc: USNRC Region I Administrator

USNRC Resident Inspector - VYNPS USNRC Project Manager - VYNPS

STATE OF VERMONT

WINDHAM COUNTY

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Then personally appeared before me, James P. Pelletier, who, being duly sworn, did state that he is Vice President - Engineering, of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.

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Gina M. Fontagine, Notary Public

My Commission expires February 10, 1995

ATTACHMENT A

References:

- a. License No. DPR-28 (Docket No. 50-271).
- Letter, USNRC to All Licensees, NVY 85-250, dated November 15, 1985 (Bulletin 85-03).
- c. Letter, VYNPC to USNRC, BVY 89-050, dated June 8, 1989.
- Letter, USNRC to All Licensees, NVY 89-144, dated June 28, 1989 (Generic Letter 89-10).
- e. Letter, VYNPC to USNRC, BVY 89-116, dated December 28, 1989.
- f. Letter, USNRC to VYNPC, NVY 90-109, dated June 11, 1990.
- g. Letter, USNRC to All Licensees, NVY 90-123, dated June 13, 1990 (Supplement 1 to Generic Letter 89-10).
- Letter, USNRC to All Licensees, NVY 90-148, dated August 3, 1990 (Supplement 2 to Generic Letter 89-10).
- Letter, USNRC to All Licensees, NVY 90-198, dated October 25, 1990 (Supplement 3 to Generic Letter 89-10).
- Letter, VYNPC to USNRC BVY 90-122, dated December 14, 1990.
- k. Letter, VYNPC to USNRC, BVY 91-26, dated March 14, 1991.
- Letter, USNRC to VYNPC, NVY \$1-113, dated June 25, 1991.
- m. Letter, VYNPC to USNRC, BVY 91-71, dated July 30, 1991.
- n. Letter, USNRC to VYNPC, NVY 91-150, dated July 30, 1991.
- o. Letter, VYNPC to USNRC, BVY 91-108, dated October 25, 1991.
- p. Letter, VYNPC to USNRC, BVY 92-09, dated January 31, 1992.