



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

May 13, 1992

Docket No. 50-271

Mr. L. A. Tremblay
Senior Licensing Engineer
Vermont Yankee Nuclear Power Corporation
580 Main Street
Bolton, Massachusetts 01740-1398

Dear Mr. Tremblay:

SUBJECT: SAFETY EVALUATION - INSERVICE TESTING (IST) PROGRAM RELIEF
REQUESTS - VERMONT YANKEE NUCLEAR POWER CORPORATION, VERMONT
YANKEE NUCLEAR POWER STATION (TAC NO. M82299)

Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," was issued April 3, 1989. Generic Letter 89-04 approved all inservice testing (IST) relief requests that were being reviewed by the staff, if the relief requests were not in conflict with positions presented in Attachment 1 of GL 89-04. The approval of these relief requests was with the provision that licensees review their most recently submitted IST Programs and implementing procedures against the positions in Attachment 1 of GL 89-04. You performed this review for Vermont Yankee Nuclear Power Station (VY) and responded to GL 89-04 in a letter dated October 3, 1989. The letter identified necessary program changes and additional relief requests for conformance with the generic letter.

The Code of Federal Regulations, 10 CFR 50.55a(g), requires certain Class 1, 2, and 3 pumps and valves in water-cooled nuclear power facilities to meet the inservice testing requirements stated in the ASME Boiler and Pressure Vessel Code (Code), Section XI: specifically Subsections IWP, "Inservice Testing of Pumps in Nuclear Power Plants," and IWV, "Inservice Testing of Valves in Nuclear Power Plants." Guidance on acceptable alternatives to Code requirements has been provided for certain aspects of inservice testing by NRC in GL 89-04.

The staff has reviewed and evaluated your response to GL 89-04 and the revised IST program relief requests and the enclosed Safety Evaluation (SE) was prepared by the staff to provide the results of our review. Relief is granted from the testing requirements that we have determined would be impractical to perform, where compliance would result in a hardship without a compensating increase in safety, or where the proposed alternative testing provides an acceptable level of quality and safety. The Technical Evaluation Report (TER), Appendix A, identifies items that you should address and respond to within one year of the date of this SE, or by the end of the next refueling

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outage, whichever is later, unless a specific period (such as 6 months) is stipulated. Considering that the IST program for Vermont Yankee will be updated for the third ten-year interval in November 1992, you should incorporate the results of this SE and the items in Appendix A into the updated program. If the subject incorporation will not include all items, a schedule for completion of the actions necessary to address the items should be included in the updated program submittal.

You are required to comply with the IST Program defined in the October 3, 1989 submittal, except where relief has been granted as identified in GL 89-04 and the enclosed SE. IST Program changes such as additional relief requests or changes to approved relief requests should be submitted for staff review, but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in GL 89-04 should be submitted to the staff, but may be implemented provided the guidance in GL 89-04, Section D, is followed. IST Program changes that involve additions or deletions of components from the IST Program should be provided to the NRC.

The review performed for the TER did not include verification that all pumps and valves within the scope of 10 CFR 50.55a and Section XI are contained in the IST Program. Additionally, for components included in the IST Program, no determination was made to ensure all applicable testing requirements were identified. Therefore, you are requested to provide the NRC with a description of the process used in developing the IST Program. The submittal should include, as a minimum, details of the documents used, the method of determining a component requires inservice testing, the basis for the testing required, the basis for categorizing valves, and the method or process used for maintaining the program current with design modifications or other activities performed under 10 CFR 50.59. If a description of this process is not already available from existing documentation, the staff envisions that this request could be answered in 2 to 4 pages. It should be incorporated into the IST Program in appropriate sections. We request this information be submitted within one year of the date of this SE, or by the end of the next refueling outage, whichever is later.

This action completes the work to be performed under Tac Number M82299.

Sincerely,
Original signed by
Victor Nerses, Acting Director
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosure:

Safety Evaluation

cc w/enclosure: See next page

*See previous concurrence

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