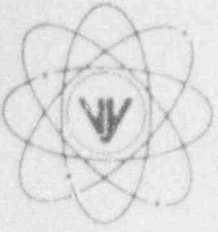


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
JOB# 779-6711

August 13, 1992
BVY 92-98

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
- a) License No. DPR-28 (Docket No. 50-271)
 - b) Code of Federal Regulations, Title 10 Chapter 1, Part 50, Section 50.55a(g)
 - c) Proposed Rule on Codes and Standards for Nuclear Power Plants, 56 Fed. Reg. 3796, dated 01/31/91
 - d) ASME Boiler and Pressure Vessel Code, Section XI, 1986 Edition, "Rules and Inservice Inspection of Nuclear Power Plant Components"
 - e) ASME/ANSI Standard OMa-1988 Addenda to ASME/ANSI OMa-1987, "Operation and Maintenance of Nuclear Power Plants"
 - f) Letter, Mr. W.P. Murphy, VYNPC, to Document Control Desk, USNRC, "Response to USNRC Generic Letter 89-04: Guidance on Developing Acceptable Inservice Testing Programs," BVY 89-90, dated 10/03/89
 - g) Letter, Mr. S.A. Varga, USNRC, to All Holders of Light Water Reactor Operating Licenses and Construction Permits, "Guidance on Developing Acceptable Inservice Testing Programs (Generic Letter No. 89-04)," NVY 89-75, dated 04/03/89

Subject: Vermont Yankee Nuclear Power Corporation Inservice Testing Program Update

Dear Sir:

Vermont Yankee is in the process of updating the Inservice Testing (IST) Program for the third ten-year interval. The current ten-year interval expires on November 1, 1992. In accordance with 10 CFR 50.55a, the program for the third ten-year interval must comply with the 1986 Edition of ASME Section XI, with no Addenda.

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With this letter, Vermont Yankee is requesting approval to update the IST Program for the third ten-year interval to the ASME/ANSI Standard OMa-1988 Addenda, including additional requirements as discussed below.

It is Vermont Yankee's understanding that the ASME/ANSI Standard OMa-1988 Addenda has been reviewed and approved by the NRC Staff and has been incorporated in currently proposed rulemaking for 10 CFR 50.55a [Reference c)]. Within this proposed rulemaking, the NRC also included certain restrictions and limitations on the use of the ASME/ANSI Standard OMa-1988 Addenda. These are:

- 1) ASME/ANSI Standard OMa-1988 Addenda expands the scope of testing to potentially include certain pumps and valves that are not classified as Class 1, Class 2, or Class 3. Because 10 CFR 50.55a presently specifies requirements only for those pumps that are designated as Class 1, Class 2, or Class 3, the requirements of ASME/ANSI Standard OMa-1988 Addenda need not be imposed on pumps and valves that are not classified as Class 1, Class 2, or Class 3. However, compliance with the requirements of Generic Letter 89-04, Position 11 [Reference g)] must also be maintained.
- 2) Paragraphs 4.2.2.3(e), "Analysis of Leakage Rates," and 4.2.2.3(f), "Corrective Action," of Part 10 of ASME/ANSI Standard OMa-1988 Addenda shall be implemented for all Category A valves that are Containment Isolation Valves, regardless of whether or not they provide a reactor coolant system pressure isolation function. This shall be in addition to the requirements of paragraph 4.2.2.2, "Containment Isolation Valves."

Vermont Yankee has performed a detailed review of both the ASME/ANSI Standard OMa-1988 Addenda and the above supplemental requirements. This review showed that the ASME/ANSI Standard OMa-1988 Addenda and the supplemental requirements have clarified many requirements in the 1986 Edition of ASME Section XI and more accurately reflect current industry practice and NRC guidance as provided in Generic Letter 89-04. Vermont Yankee believes that the use of the ASME/ANSI Standard OMa-1988 Addenda and the supplemental requirements of the ten-year interval update will provide the basis for an enhanced IST Program.

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Representatives of Vermont Yankee met with your staff on August 5, 1992 at NRC headquarters to discuss the above described plans to update our IST Program. At this meeting, verbal agreement was reached regarding our approach. However, in order to support the planned submittal of our third ten-year interval IST Program update by November, 1992, as required by 10 CFR 50.55a, Vermont Yankee hereby requests formal approval of our plans to utilize the ASME/ANSI Standard OMA-1988 Addenda as described above. To support our efforts to update our program and submit it by November, 1992, Vermont Yankee requests NRC approval of our plans no later than September 15, 1992.

We trust that the enclosed information is satisfactory; however, should you have any questions or desire any additional information on this issue, please do not hesitate to contact us.

Very truly yours,

Vermont Yankee Nuclear Power Corporation



James P. Pelletier
Vice President, Engineering

cc: USNRC Region I Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS