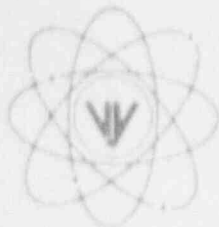


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
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BURLINGTON, MA 01790
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September 21, 1992
BYY 92 - 107

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

- References:
- a. License No. DPR-28 (Docket No. 50-271)
 - b. Letter, USNRC to [All Licensees], NVEY 88-09, dated February 1, 1988 (Generic Letter 88-01).
 - c. Letter, VYNPC to USNRC, FVY 88-62, dated July 27, 1988 (Response to Generic Letter 88-01)
 - d. Letter, USNRC to VYNPC, NVEY 89-114, dated May 24, 1989 (NRC Request for Additional Information regarding Generic Letter 88-01)
 - e. Letter, VYNPC to USNRC, BYY 89-70, dated July 25, 1989 (VY Response to NRC Request for Additional Information)
 - f. Letter, USNRC to VYNPC, NVEY 90-026, dated February 14, 1990 (NRC SER/TER regarding Review of VY GL 88-01 Response)
 - g. Letter, VYNPC to USNRC, BYY 90-26, dated March 8, 1990 (VY Position Concerning GL 88-01 Leakage Detection)
 - h. Letter, USNRC to [All Licensees], NVEY 92-21, dated February 4, 1992 (Supplement 1 to Generic Letter 88-01)
 - i. Letter, USNRC to VYNPC, NVEY 92-89, dated May 22, 1992 (USNRC response to VY Position Concerning GL 88-01 Leakage Detection)

Subject: Generic Letter 88-01, Position Concerning Leakage Detection

Dear Sir:

In Reference (b), NRC issued Generic Letter 88-01 which transmitted to licensees various staff positions relative to the occurrence of IGSCC in BWR stainless steel piping and requested licensees to respond to these staff positions in writing. Vermont Yankee responded to Generic Letter 88-01 via Reference (c). References (d) and (e) transmitted an NRC request for additional information and Vermont Yankee's responses, respectively, regarding Vermont Yankee's response to Generic Letter 88-01. In Reference (f), NRC transmitted its Safety Evaluation Report (SER) stating that Vermont Yankee's response to Generic Letter 88-01 was acceptable, with the exception of VY's position concerning leakage detection. Vermont Yankee provided supplemental information regarding our position via Reference (g). Essentially, Vermont Yankee's position was that the 2 gpm requirements for unidentified leakage in primary containment were best handled administratively by plant operating procedures, and not in plant Technical Specifications. Vermont Yankee modified plant procedures accordingly by incorporating the additional leakage monitoring requirements of Generic Letter 88-01.

In Reference (h), NRC issued Supplement 1 to Generic Letter 88-01. This document provided to licensees certain alternative staff positions and clarifications to positions as provided by the original generic letter. Alternative Staff Position No. (7) from Reference (h) states the following:

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"GL 88-01 requested that the staff's position on leakage detection be incorporated into the TS of all affected licensees. The staff subsequently determined that incorporation of the leakage detection requirements in an administrative document is not acceptable."

As a result of the clarification provided in Supplement 1 to Generic Letter 88-01, NRC Staff responded to Vermont Yankee's Reference (g) submittal via Reference (i). In this letter, NRC concluded that Vermont Yankee has satisfactorily resolved all issues relating to Generic Letter 88-01, with the exception of Technical Specification requirements on unidentified leakage. Reference (i) provided a determination that Vermont Yankee procedure OP 4152 has acceptable action requirements, except for the words "averaged over" the previous 24 hour period. In addition, Reference (i) provided a determination that the limits on unidentified leakage must be in the Technical Specifications. Accordingly, Reference (i) requested Vermont Yankee to submit proposed Technical Specifications to address this issue within 120 days (or advise the NRC Project Manager as to when Vermont Yankee expects to make such a submittal). NRC reiterated its request for a proposed change to Technical Specifications in a meeting held at NRC headquarters in Rockville Maryland on August 5, 1992.

Vermont Yankee believes that the words "averaged over" as utilized in plant procedure OP 4152 are appropriate to detect the conditions of concern in Generic Letter 88-01 (i.e. IGSCC in reactor coolant piping). Previous discussions with your Staff have highlighted a concern that unidentified reactor coolant leakage could spike to 2 gpm or higher and then decrease within a 24 hour period, as might be postulated in the case of a valve packing leak where the valve is stroked and backseated resulting in reduced leakage. In this case, the averaging method utilized in OP 4152 would not identify a leak rate increase of 2 gpm or higher, since the leakage rate would be averaged over 24 hours. However, it must be underscored that the types of leakage which could spike and then diminish are outside the scope of Generic Letter 88-01. We know of no mechanism that would cause a potential crack in reactor coolant piping caused by IGSCC under constant pressure to diminish once a through-wall crack is initiated. Hence, the averaging method utilized in OP 4152 would detect unidentified leakage of reactor coolant piping caused by IGSCC, in accordance with Generic Letter 88-01. Our previous submittals detail the other means that are available and are utilized at Vermont Yankee to detect all types of leakage in containment (e.g. containment pressure detection, drywell temperature monitoring, containment particulate monitoring, drywell sump level instrumentation).

With regard to Technical Specification requirements, Vermont Yankee has carefully considered NRC's request to place the 2 gpm leakage detection requirement of Generic Letter 88-01 into the plant Technical Specifications and has determined such a requirement clearly constitutes a backfit as defined in 10CFR50.109.

Generic Letter 88-01 and Supplement 1 [References (b) and (h), respectively] cite compliance with the General Design Criteria of 10CFR50, Appendix A (specifically, GDCs 4, 14, 30, 31, and 32) as NRC's basis for not performing a backfit analysis as required by 10CFR50.109. Vermont Yankee fully meets these GDC requirements without a change to Technical Specifications. As discussed in our previous submittals on this issue, Vermont Yankee's Technical Specifications presently contain specific limits on unidentified leakage in containment. Vermont Yankee has modified its procedures to include the 2 gpm reactor coolant leakage detection requirement of Generic Letter 88-01 and specifically references Generic Letter 88-01 as the basis for such a requirement. Relocating the 2 gpm requirement from plant procedures into the plant Technical Specifications would yield no improvement in plant safety, nor would it have any effect on the

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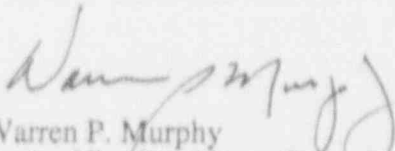
health and safety of the public or the common defense and security; yet the costs associated with preparation, submittal, review, approval, and implementation of such a proposed change to the plant Technical Specifications are significant. Our experience has been that even the simplest of proposed changes to the plant Technical Specifications incurs an associated cost of at least \$20,000 in NRC billable charges alone, not including Vermont Yankee's time to prepare, submit and implement the change. We feel that these are costs which in this case are not justified by any discernable improvement relative to plant safety.

Vermont Yankee respectfully requests that NRC reconsider their request of Reference (i) as the subject of a formal backfit analysis as required by 10CFR50.109. Should such a backfit analysis conclude that NRC's request is in fact justified, then Vermont Yankee will prepare and submit the requested proposed Technical Specification change.

We would be happy to discuss this issue with your Staff further, at your convenience.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Senior Vice President - Operations

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