Mr. Gregory A. Maret Director of Operations Vermont Yankee Nuclear Power Corporation 185 Old Ferry Road Brattleboro, VT 05301

SUBJECT:

TELEPHONE CONFERENCE TO SUPPORT THE REVIEW OF THE ACCEPTABILITY OF EMERGENCY OPERATING PROCEDURES

REGARDING CONTAINMENT RESPONSE TO A DESIGN BASIS ACCIDENT - VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. MA2479)

Dear Mr. Maret:

As a follow up to Inspection Report 50-271/98-06, dated July 2, 1998, we are reviewing the emergency operating procedures at Vermont Yankee with respect to containment flooding. In order to complete our review it is necessary to discuss the issues enclosed with the appropriate members of your staff. I am arranging the date and time for the telephone conference separately with Mr. Tom Silko of your staff. The purpose of this letter is to provide the enclosed topics of discussion.

If you should have any questions please contact me at (301) 415-1475.

Sincerely,

Original signed by

Richard P. Croteau, Project Manager Project Directorate I-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: Topics for Discussion

cc w/enclosure: See next page

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## G. Maret

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## TOPICS FOR DISCUSSION

- Results of licensee's long-term corrective actions committed to in LER 98-10
  - procedure changes?
  - permanent changes to valve positions?
  - FSAR amendments forthcoming?
- Description of the flooding/venting-related issues evaluated as part of: (a) EPG Rev 3/4 conversion, and (b) LER follow-up
  - conflicts between pump alignments/rates and assumptions in NPSH analyses?
  - impact of flooding on equipment qualification/survival?
  - impact of flooding on containment H2/O2 analyzer and PASS sampling capabilities?
  - impact of combined atmospheric and hydrostatic pressure on structures?
  - impact of wetwell (WW) venting (and liquid flow) on vent line and valves?
  - impact of drywell (DW) venting on vent line, valves, and SGTS operability?
  - ability to isolate containment if WW or DW vent line fails?
  - impact of secondary building flooding (from WW line failure) on ECCS?
  - impact of steam release into secondary building (from DW line failure) on ECCS?
  - impact of RPV venting, containment venting, and SGTS failure/bypass on EAB and control room doses?
- Description of RPV, DW, and WW vent paths and valve alignments: (a) after torus vent system (TVS) installation, (b) for the interim period (TVS valved out), and (c) for the long-term.
- 4. Description of EOPs and support procedures governing containment flooding, and containment and RPV venting for each of the periods identified in (3) above.
- Results of VY's assessment of valve operability and pressure capabilities for DW and WW vent paths under steam and water flow conditions, respectively.
- 6. Source term analysis documented in February 22, 1991, letter from GE to the BWROG (referred to in the TIA).
- 7. Clarification of what is considered to be the licensing basis radiological doses for a LOCA -- the values in 14.6.3.7 or the values in 14.9.2.1.