Mr. Donald A. Reid Senior Vice ^oresident, Operations Vermont Yankee Nuclear Power Corporation Ferry Road Brattleboro, VT 05301

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING SAFETY AND RELIEF VALVE

SETPOINT TOLERANCE AND POWER OPERATION WITH AN INOPERABLE VALVE -

VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. M98087)

Dear Mr. Reid:

By letter dated September 11, 1996. Vermont Yankee Atomic Nuclear Power Corporation submitted proposed changes to the safety and relief valve (SRV) setpoint tolerance and power operation with an inoperable SRV.

The NRC staff has reviewed the submittal, and, based on its review, finds that responses to the enclosed request for additional information are needed before we can complete our review.

Please provide your responses within 30 days from the date of this letter. If you have any questions regarding this matter, please contact me at (301) 415-1496.

Sincerely.

ORIGINAL SIGNED BY

Kahtan N. Jabbour, Sr. Project Manager Project Directorate I-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: Reguest for Additional

Information

cc w/encl: See next page

Distribution

Docket File OGC
PUBLIC REaton
PDI-3 RF SLittle

SLittle CCowgill KJabbour RWessman

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = no copy

TCollins.

ACRS

G:\JABBOUR\M98087.RAI

BBoger

-			16(1)		10/
OFFICE	PM:PDI-3	LA:PDI-80	SC:SXXB1/	BC: EMB n. C	(A) D: P01-2
NAME	KJabbour //T	SLittle	LPhillips .	RWessman - fa-	REalton
DATE	10/6/97 KM	10/7/97	10/4/97	10/07/97	10/1/97

OFFICIAL RECORD COPY

100035





Mr. Donald A. Reid Vermont Yankee Nuclear Power Corporation

cc:

Regional Administrator, Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

Mr. David R. Lewis Shaw Pittman, Potts & Trowbridge 2300 N Street, N.W. Washington, DC 20037-1128

Mr. Richard P. Sedano, Commissioner Vermont Department of Public Service 120 State Street, 3rd Floor Montpelier, VT 05602

Public Service Board State of Vermont 120 State Street Montpelier, VT 05602

Chairman, Board of Selectmen Town of Vernon P.O. Box 116 Varnon, VT 05354-0116

Mr. Richard E. McCullough Operating Experience Coordinator Vermont Yankee Nuclear Power Station P.O. Box 157 Governor Hunt Road Vernon, VT 05354

G. Dana Bisbee, Esq. Deputy Attorney General 33 Capitol Street Concord, NH 03301-6937

Resident Inspector Vermont Yankee Nuclear Power Statis U.S. Nuclear Regulatory Commission P.O. Box 176 Vernon, VT 05354

Chief, Safety Unit Office of the Attorney General One Ashburton Place, 19th Floor Boston, MA 02108 Vermont Yankee Nuclear Power Station

Mr. Peter LaPorte, Director ATTN: James Muckerheide Massachusetts Emergency Management Agency 400 Worcester Rd. P.O. Box 1496 Framingham, MA 01701-0317

Mr. Raymond N. McCandless Vermont Division of Occupational and Radiological Health Administration Building Montpelier, VT 05602

Mr. J. J. Duffy Licensing Engineer Vermont Yankee Nuclear Power Corporation 580 Main Street Bolton, MA 01740-1398

Mr. Robert J. Wanczyk Director of Safety and Regulatory Affairs Vermont Yankee Nuclear Power Corp. 185 Old Ferry Road Brattleboro, VT 05301

Mr. Ross B. Barkhurst, President Vermont Yankee Nuclear Power Corporation 185 Old Ferry Road Brattleboro, VT 05301

Mr. Gregory A. Maret, Plant Manager Vermont Yankee Nuclear Power Station P.O. Box 157 Governor Hunt Road Vernon, VT 05354

Ms. Deborah B. Katz Box 83 Shellburne Falls, MA 01370

Mr. Jonathan M. Block, Esq. Main Street P.O. Box 566 Putney, VY 05346-0566

OFFICE OF NUCLEAR REACTOR REGULATION VERMON'T YANKEF NUCLEAR POWER STATION DOCKET NO. 50-271

- 1. Discuss the original basis for 95% power limitation in technical specifications?
- 2. Does Vermont Yankee (VY) Corporation use the GESTAR methodology for reload analysis? If not, what is the approved methodology? List the computer codes that are used for reload analysis and confirm that all codes and methodology have been previously approved by NRC. Does the fuel vendor or Vermont Yankee Nuclear Power Corporation perform the reload analysis? Explain the use of the FROSSTEY code and confirm that the use of this code has been approved.
- 3. Regarding the main steam isolation valve closure pressurization event, clarify the assumptions regarding the event, including whether credit is taken for the relief mode of operation for the safety relief valves (SRVs). Are the two SRVs considered operable? Is there any dependence on which SRV is chosen inoperable? It appears that the most conservative case would be to choose the SRV with the lowest setpoint as inoporable. Please discuss this case.
- 4. The high pressure systems performance must be evaluated with the proposed technical specifications changes. The impact on high pressure coolant injection, reactor core isolation cooling, and standby liquid control systems' performance must be evaluated, in addition to any other systems with the potential for injection to the vessel at the higher pressures.
- Discuss the impact of the proposed changes on any plant specific alternate operating modes (e.g., increased core flow, extended operating domain, etc.)
- 6. From page 19 of submittal, what is base case Peak Clad Temperature (PCT)? Also, has the main steam line break outside containment been addressed? Has PCT for this event been analyzed with the proposed changes?
- 7. Please explain the quote from page 7 of the submittal dated September 11, 1996: "The plant model is changed to reflect the expected tolerances of the SRVs and SVs [safety valves]. As found testing has demonstrated the expected tolerances of the SRVs and SVs to be less than 1%. For purposes of demonstration of no SV lift with an inoperable SV, a + 1% tolerance is applied to the SRVs and a -1 % tolerance to the SVs."

Why are the tolerance assumptions reduced from $\pm 3\%$ to 1% for evaluating SRV challenges?

- 8. Page 3 of the cover letter provides the sequence to be followed for implementing the relaxed setpoint tolerance. Item no. 5 states that subsequent to the 1998 refueling outage, all SRVs and SVs will be as-found/as-left tested within ±3%/±1% of the technical specification limit. Confirm that this statement means that all SRVs/SVs will be tested at least at every 18 months.
- 3. One SRV inoperable implies that the automatic depressurization system (ADS) mode of the SRV would also be inoperable. Is ADS affected in any way by the proposed changes? If so, is there an impact on PCT for any ADS blowdown scenario?
- 10. Has the anticipated transient without scram event been addressed for the case of one inoperable SRV? In particular, is the American Society of Mechanical Engineers Code Service Level C value of 1500 psig satisfied for one inoperable SRV?.
- On page 22 of Attachment C to the submittal, it is stated that mechanical loads on the SRV piping/supports and Torus have been evaluated for the proposed increase in the SRV setpoint tolerance to +/-3%. The setpoint tolerance of the SVs are similarly proposed to be increased. Please verify that the loads on the main steam and SV piping/supports have also been evaluated for the increased SV setpoint tolerance.
- 12. Please verify that the capability of various motor-operated valves (MOVs) to operate open or closed, as necessary during peak transient differential pressure loads, has been evaluated for the proposed increased SV and SRV setpoint tolerance.

Mr. Donald A. Reid Senior Vice President, Operations Vermont Yankee Nuclear Power Corporation Ferry Road Brattleboro, VT 05301

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING SAFETY AND RELIEF VALVE

SETPOINT TOLERANCE AND POWER OPERATION WITH AN INOPERABLE VALVE -

VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. M98087)

Dear Mr. Reid:

By letter dated September 11, 1996, Vermont Yankee Atom: "uclear Power Corporation submitted proposed changes to the safety and ief valve (SRV) setpoint tolerance and power operation with an inoperable SRV.

The NRC staff has reviewed the submittal, and, based on its review, finds that responses to the enclosed request for additional information are needed before we can complete our review.

Please provide your responses within 30 days from the date of this letter. If you have any questions regarding this matter, please contact me at (301) 415-1496.

Sincerely.

ORIGINAL SIGNED BY

Kantan N. Jabbour, Sr. Project Manager Project Directorate I-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: Request for Additional

Information

cc w/encl: See next page

Distribution

Docket File OGC TCollins PUBLIC REaton ACRS PDI-3 RF SLittle CCowgil1 BBoger KJabbour RWessman

To receive a cupy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = no copy C: WABBOUR MBB087 RAI

			16(1)		10/
OFFICE	PM:PDI-3	LA:PDI-80	SC-SKXB1/	BC: EMEB n. C	(A) 12: 201:21
NAME	KJabbour //	SLittle	LPhillips	Rwessman - Fa-	REalton
DATE	10/6/97 KP	10/7/97	10/4/97	10/07/97	10//97
AA STREET STREET, STRE	THE PARTY OF THE P	The second secon	Marchard on some before pays, market skip in a condition of the source of	Annual to have been proportional to the second second	THE RESIDENCE OF THE PERSON AS

OFFICIAL RECORD COPY

Mr. Donald A. Reid Vermont Yankee Nuclear Power Corporation

cc:

Regional Administrator, Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

Mr. David R. Lewis Shaw Pittman, Potts & Trowbridge 2300 N Street, N.W. Washington, DC 20037-1128

Mr. Richard P. Sedano, Commissioner Vermont Department of Public Service 120 State Street, 3rd Floor Montpelier, VT 05602

Public Service Board State of Vermont 120 State Street Montpelier, VT 05602

Chairman, Board of Selectmen Town of Vernon P.O. Box 116 Vernon, VT 05354-0116

Mr. Richard E. McCullough Operating Experience Coordinator Vermont Yankee Nuclear Power Station P.O. Box 157 Governor Hunt Road Vernon, VT 05354

G. Dana Bisbee, Esq. Deputy Attorney General 33 Capitol Street Concord, NH 03301-6937

Resident Inspector Vermont Yankee Nuclear Power Station U.S. Nuclear Regulatory Commission P.O. Box 176 Vernon, VT 05354

Chief, Safety Unit Office of the Attorney General One Ashburton Place, 19th Floor Boston, MA 02108 Vermont Yankee Nuclear Power Station

Mr. Peter LaPorte, Director ATTN: James Muckerheide Massachusetts Emergency Management Agency 400 Worcester Rd. P.O. Box 1496 Framingham, MA 01701-0317

Mr. Raymond N. McCandless Vermont Division of Occupational and Radiological Health Administration Building Montpelier, VT 05602

Mr. J. J. Duffy Licensing Engineer Vermont Yankee Nuclear Power Corporation 580 Main Street Bolton, MA 01740-1398

Mr. Robert J. Wanczyk
Director of Safety and Regulatory
Affairs
Vermont Yankee Nuclear Power Corp.
185 014 Ferry Road
Brattleboro, VT 05301

Mr. Ross B. Barkhurst, President Vermont Yankee Nuclear Power Corporation 185 Old Ferry Road Brattleboro, VT 05301

Mr. Gregory A. Maret, Plant Manager Vermont Yankee Nuclear Power Station P.O. Box 157 Governor Hunt Road Vernon, VT 05354

Ms. Deborah B. Katz Box 83 Shellburne Falls, MA 01370

Mr. Jonathan M. Block, Esq. Main Street P.O. Box 566 Putney, VY 05346-0566

OFFICE OF NUCLEAR REACTOR REGULATION VERMONT YANKEE NUCLEAR POWER STATION DOCKET NO. 50-271

- 1. Discuss the original basis for 95% power limitation in technical specifications?
- Does Vermont Yankee (VY) Corporation use the GESTAR methodology for reload analysis? If not, what is the approved methodology? List the computer codes that are uned for reload analysis and confirm that all codes and methodology have been previously approved by NRC. Does the fuel vendor or Vermont Yankee Nuclear Power Corporation perform the reload analysis? Explain the use of the FROSSTEY code and confirm that the use of this code has been approved.
- 3. Regarding the main steam isolation valve closure pressurization event, clarify the acsumptions regarding the event, including whether credit is taken for the relief mode of operation for the safety relief valves (SRVs). Are the two SRVs considered operable? Is there any dependence on which SRV is chosen inoperable? It appears that the most conservative case would be to choose the SRV with the lowest setpoint as inoperable. Please discuss this case.
- 4. The high pressure systems performance must be evaluated with the proposed technical specifications changes. The impact on high pressure coolant injection, reactor core isolation cooling, and standby liquid control systems' performance must be evaluated, in addition to any other systems with the potential for injection to the vessel at the higher pressures.
- Discuss the impact of the proposed changes on any plant specific alternate operating modes (e.g., increased core flow, extended operating domain, etc.)
- 6. From page 19 of submittal, what is base case Peak Clad Temperature (PCT)? Also, has the main steam line break outside containment been addressed? Has PCT for this event been analyzed with the proposed changes?
- 7. Please explain the quote from page 7 of the submittal dated September 11, 1936: "The plant model is changed to reflect the expected tolerances of the SRVs and SVs [safety valves]. As found testing has demonstrated the expected tolerances of the SRVs and SVs to be less than 1%. For purposes of demonstration of no SV lift with an inoperable SV, a + 1% tolerance is applied to the SRVs and a -1 % tolerance to the SVs."

Why are the tolerance assumptions reduced from $\pm 3\%$ to 1% for evaluating SRV challenges?

- 2 -8. Page 3 of the cover letter provides the sequence to be followed for implementing the relaxed setpoint tolerance. Item no. 5 states that subsequent to the 1998 refueling outage, all SRVs and SVs will be as-found/as-left tested within $\pm 3\%/\pm 1\%$ of the technical specification limit. Confirm that this statement means that all SRVs/SVs will be tested at least at every 18 months. One SRV inoperable implies that the automatic depressurization system (ADS) mode 9. of the SRV would also be imperable. Is ADS affected in any way by the proposed changes? If so, is there an impact on PCT for any ADS blowdown scenario? Has the anticipated transient without scram event been addressed for the case of 10. one inoperable SRV? In particular, is the American Society of Mechanical Engineers Code Service Level C value of 1500 psig satisfied for one inoperable SRV?. 11. On page 22 of Attachment C to the submittal, it is stated that mechanical loads on the SRV piping/supports and Torus have been evaluated for the proposed increase in the SRV setpoint tolerance to +/-3%. The setpoint tolerance of the SVs are similarly proposed to be increased. Please verify that the loads on the main steam and SV piping/supports have also been evaluated for the increased SV setpoint tolerance. Please verify that the capability of various motor-operated valves (MOVs) to operate 12. open or closed, as necessary during peak transient differential pressure loads, has been evaluated for the proposed increased SV and SRV setpoint tolerance.