



VERMONT YANKEE NUCLEAR POWER CORPORATION

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BVY 99-137

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

- References:
- (a) Letter, VYNPC to USNRC, "Vermont Yankee's Plans for the 1998 and 1999 Refueling Outages Regarding Reactor Vessel Internals," BVY 97-123, dated September 30, 1997.
 - (b) Letter, VYNPC to USNRC, "Reactor Vessel Internal Plans for the 1999 and 2001 Refueling Outages," BVY 99-73, dated May 27, 1999.
 - (c) Letter, Cary Terry (Chairman BWRVIP) to USNRC, "BWR Utility Commitments to the BWRVIP", dated May 30, 1997.
 - (d) BWRVIP-03, "BWR Vessel and Internals Project Reactor Pressure Vessel and Internals Examination Guidelines"
 - (e) BWRVIP-06, "BWR Vessel and Internals Project Safety Assessment of BWR Reactor Internal"
 - (f) BWRVIP-25, "BWR Core Plate Inspection and Flaw Evaluation Guidelines"
 - (g) BWRVIP-26, "BWR Top Guide Inspection and Flaw Evaluation Guidelines"

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Deferral of Top Guide and Core Plate Wedge Installation**

In References (a) and (b), Vermont Yankee (VY) informed the Staff of our plans to install top guide and core plate wedges during our 1999 refueling outage. The wedges were being installed as an alternative to performing inspection recommended by the referenced Boiling Water Reactor Vessel Internal Project (BWRVIP) documents for plants without installed wedges. VY recently made a decision to reschedule installation of the wedges until the 2001 refueling outage because the final design and installation package will not be fully developed to support this outage. The purpose of this letter is to inform the NRC, as discussed in Reference (c), of our alternate inspection plans.

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Top Guide Inspections

For plants without installed wedges BWRVIP-26, Table 3-2, recommends the following inspections:

- VT-1 of welds in two adjacent aligner assemblies every other cycle
- For plants whose faulted vertical loads exceed the top guide weight, a VT-1 inspection where the hold-down latches to the shroud should be done, inspecting two hold-down devices, 180 degrees apart, every other cycle
- Enhanced VT-1 every other cycle of rim weld locations accessible during normal refueling activities

In accordance with BWRVIP guidelines, VY will inspect two of the top guide aligner assemblies and two top guide hold down latches during the 1999 outage. These inspections will be "best-effort" examinations of these assemblies. Strict compliance with BWRVIP-03 and BWRVIP-26 inspection methodology recommendations will not be possible due to access restrictions. Some welds on the assembly are difficult to view and are not accessible to conventional in-vessel cameras. The other two top guide aligner assemblies were inspected during the 1996 refuel outage with no recordable indications.

Since VY's top guide configuration does not contain a top guide rim weld, these inspections are not applicable.

Core Plate Inspections

For BWR/4 plants without installed wedges, BWRVIP-25, Table 3-2 recommends the following inspections:

- Enhanced VT-1 (EVT-1) from below the core plate, or ultrasonic testing (UT) from above core plate (once the technique is developed) of 50% of the hold-down bolts.

The UT option is not considered possible during this coming outage as the inspection technology is still under development and is currently not available. Enhanced visual inspection of the underside of the bolted connection would require removal of peripheral fuel bundles, control blades, fuel support castings, and control rod guide tubes. Disassembly to this extent has not been planned for the 1999 outage.

VY will perform VT-3 inspections of 15 of the 30 core plate hold-down bolts from above the core plate during the 1999 outage. A satisfactory VT-3 inspection was completed on all of the core plate hold-down bolts from above the core plate during the 1996 Refuel Outage.

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Summary

It has been VY's history and continuing commitment to comply with BWRVIP guidance at the earliest possible date. VY has demonstrated through aggressive decision-making and actions that we follow, to the extent possible, BWRVIP guidance even before final acceptance by the NRC. VY's recent decision to defer implementation to the 2001 outage was based on ensuring that work for the 1999 outage is ready for installation to the highest quality standards.

VY believes that the inspections planned for 1999, in addition to the inspections completed in 1996, adequately confirm the integrity of the subject vessel internal components.

VY will complete installation of the top guide and core plate wedges during the next scheduled refueling outage in 2001.

Should there be any questions pertaining to this submittal, please contact Mr. Jim DeVincentis at (802) 258-4236.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Don M. Leach
Vice President, Engineering

cc: USNRC Region 1 Administrator
USNRC Resident Inspector -- VYNPS
USNRC Project Manager -- VYNPS
Vermont Department of Public Service

SUMMARY OF VERMONT YANKEE COMMITMENTS

BVY NO.: 99-137

The following table identifies commitments made in this document by Vermont Yankee. Any other actions discussed in the submittal represent intended or planned actions by Vermont Yankee. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager of any questions regarding this document or any associated commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"
Complete inspections of the Top Guide and Core Plate as Detailed in BVY 99-137	1999 Outage
Complete installation of the top guide and core plate wedges during the 2001 refueling outage	2001 outage