



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 12, 1999

Mr. Samuel L. Newton  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
185 Old Ferry Road  
Brattleboro, VT 05301

SUBJECT: COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-04, "POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT," DATED JULY 14, 1998; VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. MA4113)

Dear Mr. Newton:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility; (b) the qualification testing of protective coatings; and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii).
  - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components (SSCs) during a postulated design basis loss-of-coolant accident (DB LOCA), the following information shall be provided to demonstrate compliance:

0500271 P

DF01

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 12, 1998, for the Vermont Yankee Nuclear Power Station. This submittal provided the information requested by GL 98-04. Clarification was provided during a phone call that took place on September 28, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301) 415-1475.

Sincerely,  
 Original signed by R. Croteau  
 Richard P. Croteau, Project Manager, Section 2  
 Project Directorate I  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket No. 50-271

cc: See next page

**DISTRIBUTION:**

File Center PUBLIC PDI-2 Rdg. T. Clark, Anderson, RI  
 E. Adensam (EGA1) R. Croteau J. Clifford P. Sullivan C. Lauron  
 J. Davis



DOCUMENT NAME: G:\PDI-2\Vermont\gla4113.wpd

INDICATE IN BOX: "C"=COPY W/O ATTACHMENT/ENCLOSURE, "E"=COPY W/ATT/ENCL, "N"=NO COPY

OFFICE	PDI-2/PM	<input checked="" type="checkbox"/> PDI-2/LA	<input checked="" type="checkbox"/>	SC:EMCB	SC/PDX-2
NAME	RCroteau	TClark		ESullivan	JClifford
DATE	11/5/99	11/4/99		11/5/99	11/11/99

**OFFICIAL RECORD COPY**

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 12, 1998, for the Vermont Yankee Nuclear Power Station. This submittal provided the information requested by GL 98-04. Clarification was provided during a phone call that took place on September 28, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301) 415-1475.

Sincerely,



Richard P. Croteau, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-271

cc: See next page

Vermont Yankee Nuclear Power Station

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  
112 State Street  
Montpelier, VT 05620-2601

Mr. Michael H. Dworkin, Chairman  
Public Service Board  
State of Vermont  
112 State Street  
Montpelier, VT 05620-2701

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

Chief, Safety Unit  
Office of the Attorney General  
One Ashburton Place, 19th Floor  
Boston, MA 02108

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

Mr. Raymond N. McCandless  
Vermont Department of Health  
Division of Occupational  
and Radiological Health  
108 Cherry Street  
Burlington, VT 05402

Mr. Gautam Sen  
Licensing Manager  
Vermont Yankee Nuclear Power  
Corporation  
185 Old Ferry Road  
Brattleboro, VT 05301

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

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

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