



# VERMONT YANKEE NUCLEAR POWER CORPORATION

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November 16, 1999  
BVY 99-143

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Reference: (a) Letter, VYNPC to USNRC, "Request for Alternate Testing Per 10CFR50.55a(a)(3)(ii)," BVY 99-113, dated September 21, 1999.  
(b) Letter, USNRC to VYNPC, "Safety Evaluation of the Inservice Testing Program for Pumps and Valves, Third Interval Plan, Request for Alternative Testing, Vermont Yankee Nuclear Power Corporation (TAC NOS. MA6502 AND MA6503)," Nvy 99-99, dated October 21, 1999.

Subject: **Vermont Yankee Nuclear Power Station**  
**License No. DPR-28 (Docket No. 50-271)**  
**Clarification of Safety Evaluation for Inservice Testing Program Relief Request RR-V17**

In Reference (a) Vermont Yankee (VY) proposed alternative testing measures for certain provisions of the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants (OM Code). Relief Request RR-V17 proposed applying the sampling approach of NUREG 1482, paragraph 4.1.2, to non-intrusive testing techniques that may be used in lieu of disassembly of the affected valves. Generic Letter (GL) 89-04 permits disassembly on a sampling basis but does not address non-intrusive testing in this regard, making specific Staff approval of this approach necessary. Reference (b) correctly restates VY's proposal in Sections 2.1.2, "Alternative Testing," and in the first paragraph of Section 2.1.3 "Evaluation," but the balance of Section 2.1.3 establishes only that VY can apply a sampling approach to disassembly activities as allowed by Position 2 of GL 89-04 and ISTC 4.5.4(c) of the 1995 ASME OM Code.

Discussions with the Staff on November 1, 1999 indicated that the approval of sampling was intended to apply to both disassembly and non-intrusive testing measures. Because VY will identify Reference (b) as a basis document for acceptability of this relief request in the IST Program, we believe it is necessary to have the Staff's acceptance of sampling for non-intrusive testing clearly stated in the evaluation. Therefore, we request that the Staff supplement Reference (b) accordingly, or provide appropriate clarifying correspondence to confirm the acceptability of the proposed practice.

If you have any questions about this transmittal, please contact Mr. Wayne M. Limberger at (802) 258-4237.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
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Gautam Sen  
Licensing Manager

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

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## SUMMARY OF VERMONT YANKEE COMMITMENTS

**BVY NO.: 99-143**

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" |
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