

VERMONT YANKEE NUCLEAR POWER CORPORATION

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November 29, 1999
BVY 99-154

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

Reference: (a) NRC Generic Letter 99-02, "Laboratory Testing of Nuclear Grade Activated Charcoal," NVY 99-60, dated June 3, 1999.
(b) Letter, VYNPC to USNRC, "Technical Specification Proposed Change No. 227," BVY 99-132, dated October 18, 1999.

Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Response to Generic Letter 99-02, Requested Action No. 1

Vermont Yankee (VY) was requested in Reference (a) to provide within 180 days of the date of Generic Letter, a written response describing our current Technical Specification (TS) requirements for laboratory testing of charcoal samples for Engineered Safety Feature (ESF) ventilation systems. Included in the response should be the specific test protocol, temperature, relative humidity, charcoal bed thickness, total residence time per bed depth, and penetration at which the TS require the test to be performed.

The following is our response to requested action No. 1 of Generic Letter 99-02.

Test Protocol:

VY Technical Specifications do not reference a particular standard, other than in the TS Bases which state that the Standby Gas Treatment (SBGT) system is tested periodically to meet the intent of ANSI N510-1975. Historically however, the ASTM D3803-1979 standard has been used, and since 1995 testing has been conducted to both the 1979 and 1989 versions of this standard.

Temperature:

Our TS currently specify a temperature of 130°C for laboratory carbon testing.

Relative Humidity:

Our TS currently specify a relative humidity of 95%.

Charcoal Bed Thickness:

This is not specified in the TS. The VY SBGT system uses a 2" thick carbon bed however.

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Total Residence Time per Bed Depth:

This is not specified in the VY TS. The VY SBT system is designed to have a ≥ 0.25 second residence time per the 2" charcoal bed depth.

Penetration at Which the TS Require the Test to be Performed:

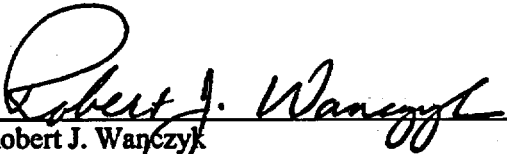
The current TS specify a 95% methyl iodide removal efficiency. This equates to a test penetration of 5%.

It should be noted that VY has submitted a license amendment request (Reference b) to adopt the suggested ASTM D3803-1989 charcoal test protocol into our TS as recommended in requested action No. 2 of Generic Letter 99-02 (Reference a). It was stated in that submittal (Reference b), that VY has historically tested to the ASTM D3803-1979 standard, and since 1995 testing has been conducted to both the 1979 and 1989 versions of this standard, as a conservative measure.

If you have any questions concerning this submittal, please contact Mr. Jeffrey T. Meyer at (802) 258-4105.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Robert J. Wanczyk
Director of Safety and Regulatory Affairs

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

