

August 1, 2006

Mr. Michael Kansler  
President  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601-1839

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF  
VERMONT YANKEE NUCLEAR POWER STATION LICENSE RENEWAL  
APPLICATION

Dear Mr. Kansler:

By letter dated January 25, 2006, as supplemented by letter dated March 15, 2006, the U.S. Nuclear Regulatory Commission (NRC) received the Entergy Nuclear Operations, Inc. application for renewal of Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station (VYNPS). The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review. Specifically, the enclosed requests for additional information are from the NRC Project Team that performed the Aging Management Program, Aging Management Review, and Time-limited Aging Analysis audits at VYNPS.

Based on discussions with Mr. Jim DeVincentis of your staff, a mutually agreeable date for your response is within 30 days of the date of this letter. If you have any questions regarding this letter or if circumstances result in your need to revise the response date, please contact me at 301-415-4053 or by e-mail at [jgr@nrc.gov](mailto:jgr@nrc.gov).

Sincerely,

**/RA/**

Jonathan Rowley, Project Manager  
License Renewal Branch B  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure:  
Requests for Additional Information

cc w/encl: See next page

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VERMONT YANKEE NUCLEAR POWER STATION LICENSE RENEWAL  
APPLICATION

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**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL APPLICATION**  
**REQUESTS FOR ADDITIONAL INFORMATION (RAIs)**

**RAI 3.5.1-53-W-1**

In Table 3.5.2-1 (Primary Containment, page 3.5-54) of the Vermont Yankee Nuclear Power Station (VYNPS) license renewal application (LRA), it states that the vent header support component, made of carbon steel material in an exposed fluid environment, has an aging effect of loss of material. The Generic Aging Lessons Learned (GALL) Report line item shown is III.B1.1-13 and the Table 1 reference is 3.5.1-53. The aging management program (AMP) shown for this line item is Inservice Inspection-IWF. GALL Report line Item III.B1.1-13 is for an indoor uncontrolled air or outdoor air environment. Please explain why GALL Report line Item III.B1.1-11 (treated water environment) and Table 1 Reference 3.5.1-49 are not associated with this aging management review (AMR) line item and the VYNPS Water Chemistry Control - BWR Program also shown with the Inservice Inspection-IWF AMP.

**RAI 3.3.1-22-K-01**

Please confirm that no auxiliary components have elastomer linings or stainless steel cladding. If there are such components, please provide a list of these components. Also, provide additional justification for the determination that pitting and crevice corrosion do not require aging management.

**RAI 3.3.1-68-K-03**

Beginning on Page 3.3-206 of the VYNPS LRA, loss of material from carbon steel components is managed using One-Time Inspection (OTI). Please justify the use of OTI for carbon steel exposed to raw water as opposed to a periodic inspection.

**RAI 4.3-H-01**

Table 4.3-2 on Page 4.3-4 of the VYNPS LRA indicates that the design transient of reactor startup/shutdown cycles has bounded all other transients for the reactor coolant system (RCS). Please describe all the transients bounded and demonstrate this bounding transient encompasses all other RCS transients (e.g. transient curves for pressure and temperature cycles). Please demonstrate that the cumulative usage factors (CUFs) are still within the limit of this revised bounding transient.

**RAI 4.3-H-02**

Does the revised feedwater nozzle analysis (Table 4.3-3) include the unanticipated leakage bypass transient which was described in NUREG-0619? If this actual transient was not considered in the CUF evaluation, please provide justification for excluding it.

Enclosure

### **RAI 4.3-H-03**

In the basis document of the Fatigue Monitoring Program, 100EF/hour heatup/cooldown rate was identified for the normal transient conditions. The actual operating condition for heatup and cooldown rate is 100EF when averaged over any one hour period. Therefore, the actual operating condition may indicate much higher rate than 100EF/hour. For example, a 60EF temperature change for the 0.1 hour period represents a 600EF/hour rate. Physically, thermal stress is a function of rate of temperature difference. The higher the rate, the higher the stress.

Please provide a description to ensure that VYNPS's automatic cycle counting program will adequately define the transients and cycle numbers. Please provide a description to ensure the fatigue cumulative usage factor and thermal stresses are evaluated in accordance with the actual transients or encompassed by the actual transients.

### **RAI 3.1.1-17-P-01**

According to USNRC Regulatory Guide 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence", analytic uncertainty (Section 1.4.1) is to be considered in the calculation of fluence. As noted by the staff, in GE-NE-000-0007-2342-R1-NP (dated July 2003), "Entergy Northeast Vermont Yankee Neutron Flux Evaluation", flux variations of up to but less than 19% was considered. In response to staff AMR audit question #202, the applicant provided extrapolated data to determine if the top of the recirculation inlet nozzles (located at a "104R940" height of 202 inches) might experience an extended power uprate fluence of  $>1 \times 10^{17}$ .

Was a maximum flux variation of ~19%, considered in this "extrapolated data"? If not, what calculated fluence level would be experienced by the top of the recirculation inlet nozzles when the applicant considers a maximum flux variation of just less than 19%?