



VERMONT YANKEE NUCLEAR POWER CORPORATION

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RUTLAND, VERMONT 05701

2.C.2.1
FVY 82-59

REPLY TO:
ENGINEERING OFFICE
1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

May 27, 1982

50-271

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Office of Nuclear Reactor Regulation
Mr. D. B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, dated December 8, 1981
(c) Letter, VYNPC to USNRC, FVY 82-12, dated February 12, 1982
(d) Letter, USNRC to VYNPC, dated May 3, 1982

Subject: Vermont Yankee Response to Generic Concerns on Purging and
Venting

Dear Sir:

Reference (b) requested Vermont Yankee to supply certain information regarding the Staff's concerns on purging and venting. The first portion of the information requested was submitted via Reference (c). The information presented in the attachment to this letter provides our response to Items 1 and 2 of Enclosure 3 to Reference (b). In response to Item 3 of the same Enclosure, which requested a commitment to limit the use of the purge/vent system to a maximum number of hours per year, we will address these concerns in our response to Reference (d).

This submittal completes Vermont Yankee's response to Reference (b). We trust this information will be satisfactory; however, should you have any questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

D. W. Edwards, Director
Operational Projects/Licensing

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ATTACHMENT

Vermont Yankee Purge and Vent Valves -
Responses to December 8, 1981 Letter

1. SEAT LEAKAGE TESTS - The basis for the NRC's request to increase the frequency of leakage integrity tests on purge and vent valves appears to be the poor operating history of this type of valve. The NRC letter cites, "severe environmental conditions and/or wear due to frequent use," as generic contributors to seal degradation. The NEC position goes on to state that, "the leakage test frequency for these valves should be keyed to the occurrence of severe environmental conditions and the use of the valves," in lieu of the requirements of 10 CFR 50, Appendix J.

We wish to point out that neither of the contributors, i.e., "environment" or "use," apply to the Vermont Yankee situation. All the purge and vent valves that perform an isolation function are located indoors and, thus, are not subject to the potential, adverse effects associated with seasonal weather conditions. Further, all the purge and vent valves at Vermont Yankee have successfully passed their leak rate test for a number of years. To increase the frequency to quarterly or semi-annually as requested by the NRC would neither be manpower/cost effective nor seem to be warranted by our plant specific experience.

Based on the above, it is our intent to continue to implement the present testing procedures and interval.

2. DEBRIS SCREENS - Vermont Yankee proposes the following course of action in this area:
 - a. At the next available outage of sufficient duration, the torus and drywell will be re-examined to identify possible debris hazards. The locations of the purge and vent line penetrations will be verified and measured for debris screen installation if these are subsequently found necessary.
 - b. At the first outage of sufficient duration, following receipt of the necessary material, screens will be installed on penetration terminations determined to need debris screens inside the torus and drywell. The design will meet seismic Category 1 criteria.