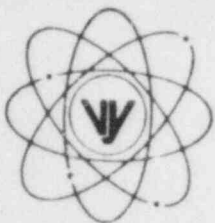


VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

FVY 84-37

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

April 19, 1984

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation
Mr. Domenic B. Vassallo, Chief
Operating Reactor Branch No. 2
Division of Licensing

References:

- a) License No. DPR-28 (Docket No. 50-271)
- b) Code of Federal Regulation, Title 10, Chapter I, Part 50
- c) Vermont Yankee Inservice Inspection Program, Rev. 7, dated January 7, 1983 (submitted 1/18/83)
- d) ASME B&PV Code, Section XI, 1974 Edition through the Summery 1975 Addenda
- e) ASME B&PV Code, Section XI, 1980 Edition through the Winter 1980 Addenda
- f) Letter, VYNPC to USNRC, dated January 30, 1979, Proposed Change No. 77
- g) Letter, USNRC to VYNPC, dated May 19, 1983, Relief Requests from Inservice Inspection Requirements

Dear Sir:

Subject: Applicable Edition and Addenda of ASME Section XI for
Vermont Yankee 1984 Inservice Inspection

10CFR50.55a(g) requires licensees to perform inservice inspection of safety-related pressure vessels, piping systems and associated support components in accordance with the edition and addenda of the ASME Boiler and Pressure Vessel Code, Section XI, which was incorporated by reference in paragraph (b) of 10CFR50.55a 12 months prior to the start of each inspection interval. Vermont Yankee's first inspection interval, which was governed in part by Reference d), was scheduled to conclude in December of 1982, but was extended as permitted by IWA-2400(a) of that Reference to allow the final inspection to be concurrent with the plant outage which ended on June 16, 1983.

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The "code of record" for the second inspection interval, as noticed in the Federal Register, Vol. 46, No. 251, dated December 31, 1981, includes the 1980 Edition of ASME Section XI through the Winter 1980 Addenda. However, Section 4.6.E of the Vermont Yankee Technical Specifications still requires performance of ISI in accordance with Reference d). On January 30, 1979 we submitted Reference f), in which we proposed to replace the specific Code referenced in the Technical Specification with a general reference to the Code edition and addenda incorporated by reference in paragraph (b) of 10CFR50.55a. This submittal was intended to prevent the need for a separate Technical Specification update prior to the start of each 120-month inspection interval, and to bring our Technical Specifications into line with the Standard Technical Specifications, as recommended by the NRC. However, an amendment incorporating the proposed change was never received.

On May 19, 1983, Vermont Yankee was directed in Reference g) to apply Reference c), as modified by Reference g), during the second inspection interval. Reference c) had been submitted only to update the list of components to reflect additions and deletions caused by design changes; the overall program remained in compliance with Reference d). It was learned during telephone conversations with Region I in March of this year that your staff had assumed that the Reference c) submittal had in fact incorporated Reference e), and had generated the directive on that basis.

Despite the confusion surrounding the issue of Code applicability for our second inspection interval, Vermont Yankee has been developing and plans to docket a revision to the ISI Program which will incorporate Reference e). At this point in time it is unlikely that submittal can be made and acceptance received prior to our June 1984 refueling outage. Consequently, it is our intention to apply Reference c) during this year's inspection, which is the first inspection of the first 3 1/3 inspection period of this interval.

A comparative analysis of Reference d) and e), performed during preliminary development of our program update, has shown that very few of the requirements of Reference e) (as modified by 10CFR50.55a, subparagraphs (b)(2)(ii) and (b)(2)(iv)) are actually more restrictive than those to which we are presently committed. Since ASME Section XI does not specify a percentage of component examinations to be completed during each outage of an inspection period, those examinations required by Reference e) which are more restrictive can be deferred until later in the period when the updated program is in effect. However, should we desire to perform those examinations for credit during the 1984 outage, they can be

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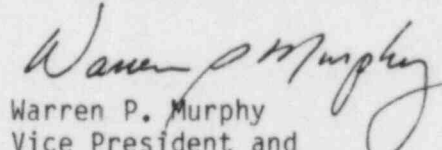
augment as necessary by extension of existing procedures to address the increased examination volumes and additional component characteristics required by Reference e). It should also be noted that certain of the Relief Request Bases contained in Reference c) will still be applicable under Reference e) and will be invoked as permitted by Reference g) during the 1984 outage. As in past years, a written inspection plan and schedule for the 1984 outage will be available on-site for regulatory review.

We believe that application of Reference c), as modified above, during the 1984 inservice inspection will provide an examination program which will satisfy the intent of 10CFR50.55a, and that no increased hazard to the public health and safety will result. It is our present intention to submit the revised ISI Program by November 1984, and to apply that program during all remaining inspections of this inspection period and the second inspection interval.

We trust that this information is satisfactory. If you have any questions or require any further information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm