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September 27, 2007
Docket No. 50-271
BVY 07-062
TAC No. MC 9668

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Reference:
1. Letter, Entergy to USNRC, "Vermont Yankee Nuclear Power Station, License No. DPR-28, License Renewal Application," BVY 06-009, dated January 25, 2006.
2. Letter, USNRC to Entergy, "Request for Additional Information for the Review of the Vermont Yankee Nuclear Power Station, License Renewal Application," NVY 07-121, dated August 29, 2007.

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
License Renewal Application, Amendment 30

On January 25, 2006, Entergy Nuclear Operations, Inc. and Entergy Nuclear Vermont Yankee, LLC (Entergy) submitted the License Renewal Application (LRA) for the Vermont Yankee Nuclear Power Station (VYNPS) as indicated by Reference 1. Subsequent to an event that occurred at VYNPS on August 21, 2007, the NRC issued a "Request for Additional Information" (RAI) as indicated by Reference 2 as appropriate to clarify information contained within the LRA. This letter is submitted to provide our response to questions detailed in RAI 2.4.4-2.

Should you have any questions concerning this letter, please contact Mr. Dave Mannai at (802) 258-5422.

I declare under penalty of perjury that the foregoing is true and correct, executed on September 27, 2007.

Sincerely,

Ted A. Sullivan
Site Vice President
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cc: See next page
enc: Attachment 1

A117
NRR

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Attachment 1

Vermont Yankee Nuclear Power Station

License Renewal Application

Amendment 30

RAI 2.4.4-2 Response

VERMONT YANKEE NUCLEAR POWER STATION
LICENSE RENEWAL APPLICATION SUPPLEMENT
ATTACHMENT 1

RAI 2.4.4-2

Please provide the results of the review performed to determine the impact of the circulating water piping, pipe supports, and west cooling tower cell (2-4) failures on license renewal scoping, screening, and applicable aging management programs. Please include the following:

A. A conclusion and basis as to whether the scoping results documented in the LRA, which initially determined that 9 of the 11 west cooling tower cells were not within the scope of license renewal, are still valid.

B. If found that the west cooling tower cells are within the scope of license renewal, please provide the following:
   I. The potential effect of a circulating water piping, pipe supports, or structural failure of the nonsafety-related west cooling tower cells (2-3 through 2-11), which were not included within the scope of license renewal, on safety-related systems, structures, and components (in accordance with 10 CFR 54.4(a)(2)). Include the potential effect of debris entering the deep basin beneath the cooling tower.
   II. The details of any age related degradation which caused the failure of the circulating water piping, pipe supports, and west cooling tower cell. Include the results of the piping and pipe supports inspection related to the current failure and any previously performed, and a description of the identified aging mechanism(s).

C. Any impact on the aging management programs for circulating water piping, pipe supports, or cooling tower cells.

Cooling Tower Background Information

VYNPS utilizes once-through condenser cooling from the Connecticut River supplemented by two forced draft cooling towers. Each tower consists of eleven cells, each cell equipped with its own forced draft fan. One cell, CT 2-1, of the west cooling tower also provides cooling to the RHR service water system in the alternate cooling system mode and is consequently safety-related. Cell CT 2-2, the cell adjacent to CT 2-1, is designed and constructed as a Seismic Class I structure to prevent adverse impact to CT 2-1 in the event of a seismic event.

Safety-related cooling tower cell CT 2-1 and Seismic Class I CT 2-2 structures have similar construction as the other cooling tower cells for dead weight loads, but a more robust bracing system to withstand wind and seismic loading. They are constructed from high quality timber and use stainless steel hardware for all bolted connections. The structural columns had been refurbished during the 1980's, with subsequent end wall refurbishment between 2002 and 2007. As required for activities associated with any safety-related and Seismic Class I SSC, the inspections and repairs on cooling tower cells CT 2-1 and CT 2-2 receive additional oversight by site Engineering, Maintenance, and Quality Assurance (QA) groups.

RAI 2.4.4-2.A

A conclusion and basis as to whether the scoping results documented in the LRA, which initially determined that 9 of the 11 west cooling tower cells were not within the scope of license renewal, are still valid.

Response to Part A:

Cooling tower cells CT 2-1 and CT 2-2 are the only cells in the scope of license renewal. Failures of the other cells will not prevent satisfactory accomplishment of a safety function identified in 10 CFR 54.4(a)(1). The scoping results documented in the LRA remain valid. See response to part B for further discussion of potential failures.

RAI 2.4.4-2.B

If found that the west cooling tower cells are within the scope of license renewal, please provide the following:

I. The potential effect of a circulating water piping, pipe supports, or structural failure of the nonsafety-related west cooling tower cells (2-3 through 2-11), which were not included within the scope of license renewal, on safety-related systems, structures, and components (in accordance with 10 CFR 54.4(a)(2)). Include the potential effect of debris entering the deep basin beneath the cooling tower.

II. The details of any age related degradation which caused the failure of the circulating water piping, pipe supports, and west cooling tower cell. Include the results of the piping and pipe supports inspection related to the current failure and any previously performed, and a description of the identified aging mechanism(s).

Response to Part B

Subpart I: As indicated in the LRA and in response to Part A, west cooling tower cells CT 2-1 and CT 2-2 are within the scope of license renewal. The failure of cooling tower cell CT 2-4 or any other of the cooling tower cells, along with the associated circulating water piping and pipe supports has no impact on the ability of the in-scope cooling tower cells and the Cooling Tower No. 2 deep basin to accomplish safety functions under design basis conditions. Cooling tower cells CT 2-1 and CT 2-2 are seismically designed to ensure that they are not adversely affected by a seismic event or by failure of other cooling tower cells. This design includes "breakaway" connections to the remaining cooling tower cells.

The cooling tower basin has a storage capacity of 1.45 million gallons, which is sufficient for 7 days of alternate cooling system (ACS) operation. The available capacity assumes that cooling tower cells CT 2-3 through CT 2-9 collapse during a seismic event resulting in an estimated 170,427 gallons of water (equivalent to the volume of all material in

these cells) being displaced (lost). The evaluation does not credit the volume of water in basin below cooling tower cells CT 2-10 and CT 2-11.

The potential for debris blockage of the ACS suction following an event involving collapse of cooling tower cells CT 2-3 through CT 2-11 has also been evaluated. The velocity through the suction grating at an ACS flow rate of 8000 gpm is 0.25 ft/sec which is 10% of the velocity required to keep sediment in suspension. This low velocity coupled with the tower cross bracing in two directions will prevent migration of debris to the ACS suction.

Failure of cooling tower cells CT 2-3 through CT 2-11 (9 of 11 cells) and associated components has no impact on safety-related cooling tower cell CT 2-1.

Subpart II: As identified in the VYNPS LRA, the aging effects on the cooling tower wooden structures are a) change in material properties, b) cracking, and c) loss of material. The aging mechanisms associated with the partial failure of CT 2-4 are iron salt attack (formation of iron salts in the wood where ferrous hardware contacts the lumber and degrades the wood cells), fungal attack (wood destroying microscopic organism called decay fungi that forms in wood exposed to suitable temperature 40°F-140°F in moist environment), and repeated wetting and drying cycles causing wood checking and physical damage which reduces wood strength.

The circulating water piping within the cooling tower is made of fiberglass and is secured in wooden support saddles. The piping separation event that occurred resulted from distribution deck sag that caused the bell/spigot joint to separate. It did not result from the effects of aging on the fiberglass piping. The wooden saddles supporting the distribution header were found in good condition with no significant degradation.

The supporting columns for the circulating water header experienced a reduction in strength due to iron salt attack and fungal attack at the upper spliced joints that caused cracking. This caused the initial failure of several support columns which led to deck sag and separation of the fiberglass circulating water piping joint. This separation increased local water loading and caused additional column failures which lead to the partial CT 2-4 failure.

RAI 2.4.4-2.C

Any impact on the aging management programs for circulating water piping, pipe supports, or cooling tower cells.

Response to Part C:

The circulating water piping separated due to the initial CT 2-4 column failure, rather than due to the effects of aging. Consequently, the failure does not indicate a need for change to the aging management programs for the circulating water piping. Thus, there is no impact on the aging management programs for circulating water piping.

VERMONT YANKEE NUCLEAR POWER STATION
LICENSE RENEWAL APPLICATION SUPPLEMENT
ATTACHMENT 1

Aging effects identified in the VYNPS LRA for the cooling tower structural elements are loss of material, cracking and change in material properties. These aging effects are consistent with those associated with the failure of CT 2-4. The LRA identifies a need for enhancement to the Structures Monitoring Program to add guidance for performing examinations of wood cooling tower elements to identify loss of material, cracking, and change in material properties. This enhancement will include details for examination and acceptance criteria for wood structures and structural components (i.e., columns and circulating water pipe supports) to ensure aging effects are identified and corrected prior to loss of intended function. To detect change in material properties, the enhancement will entail inspections that are more involved than remote visual surface inspections. Lessons learned from review of the failure of CT 2-4 will be considered in implementation of the enhancement identified for the Structures Monitoring Program.