

# VERMONT YANKEE NUCLEAR POWER CORPORATION

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September 11, 2000  
BVY 00-71

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

References:

- (a) Letter, VYNPC to USNRC, "Request to Amend Previous Approvals Granted under 10 CFR 20.302(a) for Disposal of Contaminated Septic Waste and Cooling Tower Silt to Allow for Disposal of Contaminated Soil," BVY 99-80, dated June 23, 1999.
- (b) Letter, VYNPC to USNRC, "Supplement to Request to Amend Previous Approvals Granted under 10 CFR 20.302(a) to Allow for Disposal of Contaminated Soil," BVY 00-02, dated January 4, 2000.
- (c) Letter, USNRC to VYNPC, "Vermont Yankee Nuclear Power Station, Request to Amend Previous Approvals Granted under 10 CFR 20.302(a) to Allow for Disposal of Contaminated Soil (TAC No. MA5950)," NVY 00-58, dated June 15, 2000.
- (d) Letter, USNRC to VYNPC, "Revised Safety Evaluation – Approval Pursuant to 10 CFR 20.2002 for Onsite Disposal of Cooling Tower Silt – Vermont Yankee Nuclear Power Station (TAC No. M96371)," NVY 97-85, dated June 18, 1997.

**Subject: Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
Request to Amend Previous Approval Granted Pursuant to  
10 CFR 20.2002 for Disposal of Contaminated Soil**

In accordance with 10 CFR 20.2002 (previously 10 CFR 20.302(a)), Vermont Yankee (VY) submits this application to amend the previously granted approval to dispose of slightly contaminated soil. This application expands the allowable waste stream to include slightly contaminated soil generated as a residual by-product of other types of on-site construction activities.

In References (a) and (b), VY requested approval to dispose of approximately 25.5 m<sup>3</sup> of accumulated soil that was generated due to construction activities. In addition, it was requested that VY be allowed to dispose of approximately 28.3 m<sup>3</sup> of soil that is spread annually on station roads and walkways during the winter. NRC acceptance is documented in Reference (c).

This application specifically requests approval to dispose of contaminated soil that is created due to other on-site construction related activities including but not limited to design change implementation and land maintenance.

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In addition, VY requests that NRC's review recognize that, although VY indicated in Reference (b) that the south disposal field (approximately 1.9 acres in size) is currently expected to be used for disposal of the subject material, VY is also authorized to use the alternate north disposal field (approximately 10 acres in size). Approval to use both the north and south fields for disposal was granted in Reference (d). VY's radiological impact assessments have conservatively assumed all of the disposal activities occur on the smaller south field to maximize potential calculated doses. These assessments bound the situation where a portion of the land spreading occurs on the north field.

VY will continue to limit the total activity spread, from approximately 28.3 m<sup>3</sup> of soil generated each year, to within the limits assumed in the radiological assessment previously submitted in Reference (b).

A radiological assessment and proposed operational controls for the inclusion of the additional material for on-site disposal was provided in Reference (b). The assessment demonstrates that the dose impact expected from the proposed activity, in total with all past waste spreading operations, will not approach the dose limits already imposed for septic and cooling tower silt disposal. All soil analyses will be to environmental lower limits of detection.

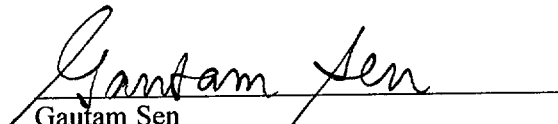
The results of all disposal operations will be reported in the Annual Radioactive Effluent Release Report. The combined radiological impact, for all on-site disposal operations, will continue to be limited to a total body or organ dose of a maximally exposed member of the public of less than one mrem/year during the period of active VY control of the site, or less than five mrem/year to an inadvertent intruder after termination of active site control.

Upon receipt of your approval, this request as well as the basis for approval will be incorporated into the Off-Site Dose Calculation Manual.

We trust that the information contained in the submittal is sufficient. However, should you have any questions or require further information concerning this matter, please contact Mr. Jim DeVincentis at 802-258-4236.

Sincerely,

Vermont Yankee Nuclear Power Corporation

  
Gautam Sen  
Licensing Manager

cc: USNRC Region I Administrator  
USNRC Resident Inspector - VYNPS  
USNRC Project Manager - VYNPS  
VT Department of Public Service

**SUMMARY OF VERMONT YANKEE COMMITMENTS**

**BVY NO.: 00-71**

The following table identifies commitments made in this document by Vermont Yankee. Any other actions discussed in the submittal represent intended or planned actions by Vermont Yankee. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager of any questions regarding this document or any associated commitments.

<b>COMMITMENT</b>	<b>COMMITTED DATE OR "OUTAGE"</b>
<b>None</b>	<b>N/A</b>