

VERMONT YANKEE NUCLEAR POWER CORPORATION

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(802) 257-5271

March 18, 2002
BVY 02-16

U.S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
Mail Stop O-5 E7
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

U.S. Nuclear Regulatory Commission
Secretary
Office of the Secretary of the Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

- References:
- (a) Letter, USNRC to VYNPC, "Issuance of Order for Interim Safeguards and Security Compensatory Measures for Vermont Yankee Nuclear Power Station," (NVY 02-17), dated February 25, 2002
 - (b) Letter, VYNPC to USNRC, "Response to Order for Interim Safeguards and Security Compensatory Measures," (BVY 02-15), dated March 18, 2002

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Request for Extension of Time to Submit an Answer or Request a Hearing**

Dear Mr. Collins:

By Reference (a) the U.S. Nuclear Regulatory Commission (NRC) issued an Order modifying the operating license of the Vermont Yankee Nuclear Power Station to require compliance with specified interim safeguards and security compensatory measures as a result of the generalized high-level threat environment. Section IV of the Order states that, in accordance with 10 CFR 2.202, a licensee must submit an answer to the Order and may request an extension of time in which to submit an answer or to request a hearing on the Order within twenty (20) days of the date of the Order. In addition, the Order states, "[w]here good cause is shown, consideration will be given to extending the time to request a hearing."

For the following reasons, Vermont Yankee Nuclear Power Corporation (VY) hereby requests an extension of time to supplement the answer to the Order submitted in Reference (b) and to request a hearing.

As required by Condition C.1 of the Order, VY's response (Reference (b)) identifies specific actions to be taken to comply with each applicable requirement and provides a schedule for implementation. VY has responded to Conditions B.1 and B.2 by identifying requirements with which (1) VY is unable to comply; (2) compliance is unnecessary in VY's specific circumstances; (3) compliance would cause VY to be in violation of a Commission regulation or the facility license; or (4) implementation would adversely impact safe operation of the facility.

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In one instance, as detailed in the attachment to this letter, VY is unable to complete the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be within the required response time. Because VY will be unable to ascertain what actions would be appropriate in the context of meeting the NRC's intent for this measure, VY will be unable to determine whether it is necessary to request a hearing until the NRC notifies VY that the actions and proposed schedule described in our response satisfy the intent of the applicable requirements of the Order.

Because of the unique nature of the situation that precipitated issuance of the Order, pursuant to Section IV of the Order, VY requests (1) an extension of time to file an answer for Interim Compensatory Measure B.2.a(2) until July 5, 2002, for completing the necessary analyses and informing the NRC of the specific actions to be taken to implement that measure, and (2) that a comparable extension of time to file a request for hearing will be granted for that matter.

If you have any questions on this transmittal, please contact Mr. Don M. Leach at (802) 258-4234.

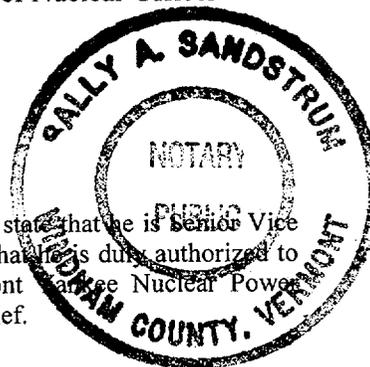
Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Michael A. Balduzzi
Michael A. Balduzzi
Senior Vice President and Chief Nuclear Officer

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Michael A. Balduzzi, who, being duly sworn, did state that he is Senior Vice President and Chief Nuclear Officer of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.



Sally A. Sandstrum
Sally A. Sandstrum, Notary Public
My Commission Expires February 10, 2003

Attachment

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cc: (with Attachment)

U.S. Nuclear Regulatory Commission
ATTN: Mr. Glenn M. Tracy, Chief
Operator Licensing, Human Performance
and Plant Support Branch, NRR
Mail Stop O-6H16
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

U.S. Nuclear Regulatory Commission, Region I
ATTN: Mr. John R. White, Chief
Radiation Safety and Safeguards Branch
475 Allendale Road
King of Prussia, PA 19406-1415

U.S. Nuclear Regulatory Commission
Secretary, Office of the Secretary of the Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

U.S. Nuclear Regulatory Commission
ATTN: Assistant General Counsel for Materials Litigation
and Enforcement
Washington, DC 20555

U.S. Nuclear Regulatory Commission
Regional Administrator – Region I
475 Allendale Road
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U.S. Nuclear Regulatory Commission
Resident Inspector – VYNPS
Vermont Yankee Nuclear Power Station

U.S. Nuclear Regulatory Commission
Project Manager - VYNPS
Washington, DC 20555

Vermont Department of Public Service

Response to Interim Compensatory Measures Requiring Significant Analyses

Interim Compensatory Measure Item B.2.a(2):

The analyses required to meet Order Conditions B.1, B.2 and C.1 could not be completed within the required Order response period. The following steps and schedule for responding to this Interim Compensatory Measure are:

1. Vermont Yankee Nuclear Power Corporation (VY) is obtaining TM5-1300, "Tri-Services Manual, Structures to Resist the Effects of Accidental Explosions," and the BLAST/FX program.
2. VY will analyze the required vehicle bomb impacts using TM5-1300 in conjunction with the BLAST/FX program for structures and personnel. VY expects to complete this analysis by May 15, 2002.
3. VY will determine the necessary mitigative steps if the analysis identifies vulnerabilities. Mitigative steps may include establishing temporary vehicle barriers, relocating personnel or strengthening structures. This determination is expected to be completed by June 15, 2002.
4. Within twenty (20) days after completion of the determination of mitigative measures, VY will provide the responses directed by Order Conditions B.1, B.2 and C.1.