



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Vermont Yankee
322 Governor Hunt Rd.
P.O. Box 157
Vernon, VT 05354
Tel 802-257-7711

November 7, 2003
BVY 03-101

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

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Technical Specification Proposed Change No. 262 - Supplement No. 2
Alternative Source Term – Seismic Verification Reports**

By letter¹ dated July 31, 2003, Vermont Yankee² (VY) proposed to amend Facility Operating License DPR-28 for the Vermont Yankee Nuclear Power Station (VYNPS) by incorporating an Alternative Source Term (AST) methodology into the facility's licensing basis. The license amendment request (LAR) was prepared in accordance with applicable regulatory guidance, and the analyses performed using the AST demonstrate that postulated accident consequences meet regulatory acceptance limits.

The Safety Assessment that was provided as Attachment 5 to the July 31, 2003 letter discussed an Alternative Leakage Treatment (ALT) strategy that credits the reduction in main steam isolation valve releases due to the holdup and deposition provided by certain downstream components. An evaluation of the seismic ruggedness of this ALT pathway was referenced in the Safety Assessment (i.e., Reference 28). To assist the NRC staff in its evaluation of the acceptability of the ALT strategy, VY is providing as Attachment 1 hereto the ALT Pathways and Boundaries Seismic Verification Report (i.e., Reference 28 of the Safety Assessment) and as Attachment 2 the associated ALT Pathways and Boundaries Walkdown Report. As stated in Attachment 1, a confirmatory walkdown of normally inaccessible piping and equipment will be conducted during the upcoming Spring 2004 refueling outage. It should also be noted that Attachment 1 is an updated version of Reference 28 and the report number differs (due to a typographical error) from that specified in the Safety Assessment.

In response to discussions with the NRC staff regarding VYNPS' licensing basis relative to seismic criteria, VY confirms that VYNPS was licensed prior to Appendix A to 10CFR100 becoming effective. Consequently, Appendix A to 10CFR100 is not part of VYNPS' licensing basis. Item No. 6 on page 9-3 of Attachment 1 also acknowledges this licensing basis.

¹ Vermont Yankee letter to U.S. Nuclear Regulatory Commission, "Alternative Source Term," Proposed Change No. 262, BVY 03-70, July 31, 2003.

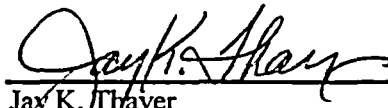
² Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. are the licensees of the Vermont Yankee Nuclear Power Station.

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The information provided herewith is supplemental information that further supports the full scope application of an alternative source term for VYNPS. As such, this information does not expand the scope or change the conclusions of the original application for a license amendment, and the prior determination of no significant hazards consideration is unchanged.

If you have any questions in this regard, please contact Mr. Len Gucwa at (802) 258-4225.

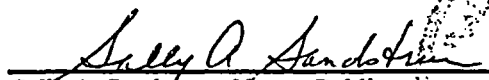
Sincerely,



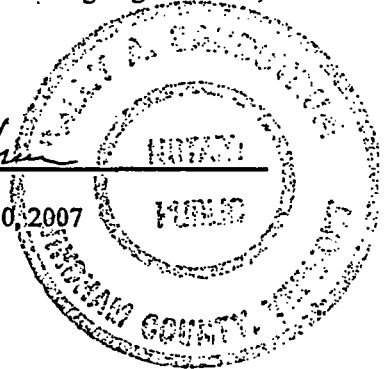
Jay K. Thayer
Site Vice President

STATE OF VERMONT)
)ss
WINDHAM COUNTY)

Then personally appeared before me, Jay K. Thayer, who, being duly sworn, did state that he is Site Vice President of the Vermont Yankee Nuclear Power Station, that he is duly authorized to execute and file the foregoing document, and that the statements therein are true to the best of his knowledge and belief.



Sally A. Sandstrom, Notary Public
My Commission Expires February 10, 2007



Attachments (2)

cc:

USNRC Region 1 Administrator (cover letter only)
USNRC Resident Inspector – VYNPS (cover letter only)
USNRC Project Manager – VYNPS (two copies/with attachments)
Vermont Department of Public Service (with attachments)