

**From:** "Meyer, Jeff" <jmeyer5@entergy.com>  
**To:** "Rick Ennis" <RXE@nrc.gov>  
**Date:** 6/8/04 2:23PM  
**Subject:** 2.206 Response

Rick Ennis,  
Attached is a copy of our response to the 10CFR2.206 inquiry that is due to NRC today.  
Paper copies to other recipients will be by US Mail, as is typical.  
If you have any questions, please let me know.  
Jeff Meyer  
VY Licensing  
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B-42



June 8, 2004  
BVY 04-054

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)  
Response to 10CFR2.206 Petition Information Request**

In a letter dated May 21, 2004, Nuclear Regulatory Commission (NRC) requested Vermont Yankee (VY) respond to five issues related to a 10CFR2.206 petition filed by the New England Coalition. Our response to the issues is provided by this letter.

**1) Document the verification of the inventory of all special nuclear material in the spent fuel pool.**

VY has recently completed an inventory of all Special Nuclear Material (SNM) in the Spent Fuel Pool (SFP). This effort consisted of the following:

- a) A check of every spent fuel assembly serial number against the documented location in the SFP racks. No discrepancies in the SNM records were noted.
- b) A verification that the Local Power Range Monitor (LPRM) detectors stored in the SFP were in the pool as documented. No discrepancies were noted.
- c) A verification that the remaining portions of the fuel rods that were the source of the unaccounted for fuel rod pieces, were in their documented locations. No discrepancies were noted.

Thus, VY is confident that the location of SNM currently in the spent fuel pool is properly documented.

**2) Document all other actions you are performing to locate the missing fuel.**

VY is performing the following in order to locate the missing fuel rod pieces:

- a) VY has assembled a highly qualified investigation team consisting of plant staff, Entergy shared resources and external consultants.
- b) Project specific work instructions were developed to direct team activities.
- c) The following areas were thoroughly and systematically inspected with a video camera system: the SFP floor, the top of the SFP storage racks and top of fuel bundles, empty rack locations, selected individual fuel assemblies to verify specific rod locations, the area between the SFP storage racks and all containers in the SFP. These inspections were performed and monitored by personnel

experienced in SFP inspections. The inspections were videotaped and the tapes were independently reviewed by individuals experienced and knowledgeable in SFP activities. These inspections resulted in no indication that the fuel rod pieces are in the SFP.

- d) All spent fuel assemblies stored in the SFP have been verified to be in their correct rack locations (see item 1.a).
  - e) A methodical review of pertinent documents is being performed to gather information that will be used to analyze potential exit scenarios from the plant and create timelines of significant events to recreate and attempt to follow the movement of the fuel rod pieces.
  - f) Interviews are being conducted of key personnel that were in a position to be involved with SNM control. Information obtained from the interviews is being input into scenarios under development for the root cause analysis. To date no firm, reliable record has been found to determine what actually occurred to the missing fuel rod pieces.
- 3) Document that the location of the remaining portions of the two spent fuel rod segments have been verified.

As discussed in item (1) above, VY has determined that the remaining portions of the fuel rods, that were the sources of the missing pieces, are in their documented SFP locations.

- 4) Provide results of your actions to locate the missing fuel when the current efforts are completed.

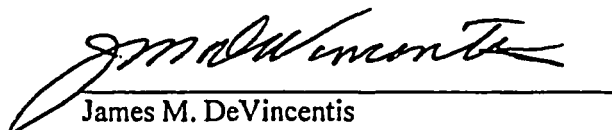
A formal project report, including a root cause analysis will be prepared at the conclusion of this investigation. An initial Licensee Event Report (LER) is to be submitted to NRC documenting this event by June 18, 2004 and the investigation results will be provided in a supplement to this LER.

- 5) Provide a schedule for these actions by June 8, 2004.

VY currently anticipates our investigation to be complete by July 30, 2004 and an LER supplement is expected to be submitted by August 19, 2004.

If you have any questions concerning this transmittal, please contact me at (802) 258-4236.

Sincerely,



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James M. DeVincentis  
Manager, Licensing

cc: USNRC Region 1 Administrator  
USNRC Resident Inspector – VYNPS  
USNRC Project Manager – VYNPS  
Vermont Department of Public Service

## SUMMARY OF VERMONT YANKEE COMMITMENTS

BVY NO.: BVY 04-054, Response to 10CFR2.206 Petition Information Request

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.

COMMITMENT	COMMITTED DATE OR "OUTAGE"
None	N/A