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September 30, 2004

Docket No. 50- 271  
BVY 04-101  
TAC MC0761

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

**Subject: Vermont Yankee Nuclear Power Station  
Technical Specification Proposed Change No. 263 – Supplement No. 16  
Extended Power Uprate – Additional Information Related to Request for  
Additional Information EMEB-B-5**

Reference: 1) Vermont Yankee Nuclear Power Station, "Technical Specification Proposed Change No. 263, Supplement 5 Extended Power Uprate – Response to Request for Additional Information," BVY 04-008, January 31, 2004  
2) U.S. Nuclear Regulatory Commission letter to Vermont Yankee, "Vermont Yankee Nuclear Power Station-Safety Evaluation of Licensee's Response to Generic Letter 96-05 (TAC No. M97114)," December 14, 2000  
3) BWR Owners' Group to U.S. Nuclear Regulatory Commission, "BWR Owners' Group DC Motor Program – BWR OG Project Number 691," BWR OG – 00083, October 2, 2002

This letter provides additional information in support of the application by Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (Entergy) for a license amendment to increase the maximum authorized power level of the Vermont Yankee Nuclear Power Station (VYNPS) from 1593 megawatts thermal (MWt) to 1912 MWt.

Based on telecoms with NRC staff, additional information related to Vermont Yankee's (VY) response to EMEB-B-5, provided in Reference (1), is needed relative to VY's implementation of GL 96-05 "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves." Reference 3 provided NRC Staff acceptance of the VY's GL 96-05 response.

ADD1

The additional information is as follows:

*Vermont Yankee (VY) will revise the Motor Operated Valve Periodic Verification Program (MOV PVP) to include periodic at-the-valve testing as a means to verify the effectiveness of the MCC testing methodology as discussed in Reference 2. The MOV PVP will also be revised to formalize the process for trending of DC motors.*

*The BWROG Direct Current Motor Methodology (DCM) (Reference 3) was implemented as a verification check for the existing VY analysis of "line break" isolation valves stroke times. The stroke time estimates produced by both methods were comparable.*

*The DCM was not used to determine required forces for DC MOVs since the EPRI Performance Prediction Methodology (PPM) had already been performed for these valves. VY considered the PPM to be slightly more conservative, so there was no need to change the analysis method.*

*The DCM was not used to determine available motor torque for DC MOVs since the existing VY analysis for calculating available reduced voltage motor torque is comparable or slightly more conservative. VY also has extensive DC motor dynamometer tests which can be used to validate or improve the standard motor curves.*

*VY's current use of the DCM is therefore limited to validation of current analysis.*

This letter provides a commitment for revising the MOV PVP to include periodic at-the-valve testing and to formalize the trending process for DC motors.

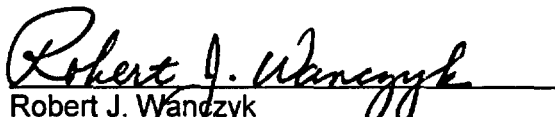
This supplement to the license amendment request provides additional information to update Entergy's application for a license amendment and does not change the scope or conclusions in the original application, nor does it change Entergy's determination of no significant hazards consideration.

If you have any questions or require additional information, please contact Mr. James M. DeVincentis at (802) 258-4236.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 30, 2004.

Sincerely,

  
Robert J. Wanczyk  
Director, Nuclear Safety Assurance  
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