

Entergy Nuclear Northeast

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September 30, 2004

Docket No. 50-271 BVY 04-107 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. 17 Extended Power Uprate – Response to Request for Additional Information

related to the 10 CFR 50 Appendix R Timeline.

Reference:

1) Vermont Yankee Nuclear Power Station, "Technical Specification Proposed Change No. 263 – Extended Power Uprate," BVY 03-80, September 10, 2003

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) capability to mitigate a 10 CFR50 Appendix R fire event as discussed in Attachment 4 to Reference 1) was requested.

The additional information is as follows.

VY's EPU submittal documented that the time to core uncovery as a result of EPU was changed from 25.3 minutes to 21.3 minutes and stated that there is sufficient time available for the operator to perform the required actions. This statement is based on the current Safe Shutdown Capability Analysis (SSCA) assumption that the Reactor Core Isolation Cooling (RCIC) system can be made operable in approximately 15 minutes. VY has revised the procedure governing operator actions and is in the process of verifying this assumption. This verification as well as training of operations crews will be completed by December 1, 2004.

This letter provides a commitment to verify the time assumed in the SSCA and complete operator training by December 1, 2004.

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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. Wandzyk
Director, Nuclear Safety Assurance

Vermont Yankee Nuclear Power Station

cc: Mr. Richard B. Ennis, Project Manager Project Directorate I Division of Licensing Project Management Office of Nuclear Reactor Regulation Mail Stop O 8 B1 Washington, DC 20555

> Mr. Samuel J. Collins Regional Administrator, Region 1 U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406-1415

USNRC Resident Inspector Entergy Nuclear Vermont Yankee, LLC P.O. Box 157 Vernon, Vermont 05354

Mr. David O'Brien, Commissioner VT Department of Public Service 112 State Street – Drawer 20 Montpelier, Vermont 05620-2601

Licensee Identified Commitment Form

This form identifies actions discussed in this letter for which Entergy Nuclear Operations, Inc. (Entergy) commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are <u>not</u> commitments.

COMMITMENT	TYPE (Check one)		
	One-Time Action	Continuing Compliance	SCHEDULED COMPLETION DATE (If Required)
Verify the RCIC start time assumed in the SSCA and complete training of operations crews on the revised procedure.	x		December 1, 2004