



Entergy Nuclear Vermont Yankee, LLC
Entergy Nuclear Operations, Inc.
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December 8, 2004

Docket No. 50-271
BVY 04-131
TAC No. 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. 22
Extended Power Uprate – 10 CFR 50 Appendix R Timeline Verification**

Reference: 1) Entergy letter to U.S. Nuclear Regulatory Commission, "Vermont Yankee Nuclear Power Station, Technical Specification Proposed Change No. 263, Extended Power Uprate," BVY 03-80, September 10, 2003
2) Entergy letter to U.S. Nuclear Regulatory Commission, "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," BVY 04-107, September 30, 2004

As requested by the NRC staff, this letter provides additional information in support of the application (Reference 1) 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.

Reference 2 provided a commitment to verify the time assumed in the Safe Shutdown Capability Analysis for a postulated Appendix R fire and complete operator training in the revised alternate shutdown procedure by December 1, 2004. Those commitments have been met.

All six operating crews were retrained and tested in their ability to safely shut down the plant in the event that the control room must be evacuated. The results of the length of time to place the reactor core isolation cooling (RCIC) system in service from the alternate shutdown panels are presented in Table 1 below. These actual times are realistically conservative in that they include time to reposition valves that may not need repositioning.

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Table 1

Operating Crew	Time to RCIC Initiation (min:sec)
A	14:38
B	13:26
C	12:26
D	15:09
E	13:18
F	12:17
Average	13:32

Based on the results of this demonstration, the assumption in the Safe Shutdown Capability Analysis that the RCIC system can be made operable in approximately 15 minutes is confirmed. Therefore, sufficient margin exists to allow operator action to manually start the RCIC system prior to the reactor water level reaching the top of the active fuel.

This supplement to the license amendment request provides additional information to clarify 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.

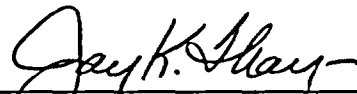
No new regulatory commitments are made in this submittal.

If you have any further 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 December 8, 2004.

Sincerely,



Jay K. Thayer
Site Vice President
Vermont Yankee Nuclear Power Station

cc: (see next page)

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