

**From:** Rick Ennis  
**To:** Jim DeVincentis  
**Date:** 9/30/05 8:15AM  
**Subject:** VY EPU - Regulatory Commitments

Jim,

Based on my review of the VY EPU application and all supplements submitted to date (i.e Supplements 1-35), attached is a table listing all regulatory commitments made by Entergy to support the amendment request. This table will be included as Section 4.0 of the safety evaluation.

Please review the table and let me know which commitments have been completed or superceded by other commitments (e.g., some of the earlier steam dryer inspection commitments). For any completed or superceded items, please cite the documentation that supports the latest status (e.g., Supplement x, Attachment y, page z).

Your response is requested by COB 10/7.

thanks,

Rick

**CC:** Brian Hobbs; Craig Nichols; Len Gucwa; Ronda Daflucas

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No.	COMMITMENT	REFERENCE (Entergy letter number and date)	TYPE		SCHEDULED COMPLETION DATE	NRC COMMENTS
			One-time Action	Continuing Compliance		
1	Steam dryer inspection during RFO.	BVY 04-058 July 2, 2004 (Reference 9)	x		Fall 2005	
2	Steam dryer inspection during RFO.	BVY 04-058 July 2, 2004 (Reference 9)	x		Spring 2007	
3	Steam dryer inspection during RFO.	BVY 04-058 July 2, 2004 (Reference 9)	x		Fall 2008	
4	Perform flow-induced vibration monitoring.	BVY 04-058 July 2, 2004 (Reference 9)	x		EPU implementation	
5	Implement those modifications contained in ISO New England letter of March 12, 2004.	BVY 04-086 August 25, 2005 (Reference 13)	x		Prior to increasing power above CLTP	
6	Install additional capacitor banks.	BVY 04-086 August 25, 2005 (Reference 13)	x		Prior to exceeding 630 MWe (gross)	
7	Provide details regarding Action Item No. 2.	BVY 04-097 September 14, 2004 (Reference 14)	x		September 29, 2004	Per Reference 14, Attachment 1, page 3, "Action Item No. 2" pertains to Entergy providing additional details on the power ascension test plan.
8	Provide results of the acoustic analysis model to the NRC staff during a meeting.	BVY 04-097 September 14, 2004 (Reference 14)	x		September 30, 2004	

No.	COMMITMENT	REFERENCE (Energy letter number and date)	TYPE		SCHEDULED COMPLETION DATE	NRC COMMENTS
			One-time Action	Continuing Compliance		
9	Perform a detailed inspection of the steam dryer during the next scheduled refueling outage. The inspection will be performed in accordance with the VYNPS vessel internals monitoring program and recommendations of GE SIL 644, Supplement 1.	BVY 04-097 September 14, 2004 (Reference 14)	x		Fall 2005	
10	Perform a detailed inspection of the steam dryer during two subsequent refueling outages. The inspections will be performed in accordance with the VYNPS vessel internals monitoring program and recommendations of GE SIL 644, Supplement 1.	BVY 04-097 September 14, 2004 (Reference 14)	x		Spring 2007 and Fall 2008	
11	Provide the NRC staff the results of the steam dryer inspections during the next two refueling outage.	BVY 04-097 September 14, 2004 (Reference 14)	x		After Fall 2005 and Spring 2007	
12	Prior to implementing, discuss changes to the long term monitoring plan for the steam dryer with the NRC staff.	BVY 04-097 September 14, 2004 (Reference 14)	x		Indeterminate	
13	Add the steam dryer to the VYNPS Vessel Internals Inspection Program as an augmented exam.	BVY 04-097 September 14, 2004 (Reference 14)	x		Fall 2005	

No.	COMMITMENT	REFERENCE (Entergy letter number and date)	TYPE		SCHEDULED COMPLETION DATE	NRC COMMENTS
			One-time Action	Continuing Compliance		
14	Existing and new steam dryer indications will be evaluated using ASME Section XI criteria as guidance, along with industrial standards and practices. Fracture mechanics analysis will be incorporated into the evaluation as appropriate. Any indication predicted to result in an unacceptable failure will be repaired in accordance with approved procedures. Technical justification will be documented for all unrepaired flaw indications left in service for the next cycle.	BVY 04-097 September 14, 2004 (Reference 14)	x		Indeterminate	
15	Implement the BWROG guidelines on moisture carryover monitoring when issued.	BVY 04-097 September 14, 2004 (Reference 14)	x		Indeterminate	
16	Implement flow induced vibration and steam dryer monitoring, including associated evaluation as necessary during EPU power ascension testing as described in Entergy letter BVY 04-100.	BVY 04-100 September 23, 2004 (Reference 16)	x		During EPU power ascension testing	
17	Discuss details of the acoustic analysis and steam dryer power ascension test acceptance criteria at a meeting with NRC staff.	BVY 04-100 September 23, 2004 (Reference 16)	x		September 30, 2004	

No.	COMMITMENT	REFERENCE (Entergy letter number and date)	TYPE		SCHEDULED COMPLETION DATE	NRC COMMENTS
			One-time Action	Continuing Compliance		
18	Implement BWROG operational (moisture carryover) response guidance.	BVY 04-100 September 23, 2004 (Reference 16)	x		During EPU power ascension testing	
19	Revise the MOV Periodic Verification Program to include periodic at-the-valve testing and formalize the process for DC motor trending.	BVY 04-101 September 30, 2004 (Reference 17)	x		December 1, 2004*	* Attachment 3 to Entergy letter BVY 05-083, dated September 10, 2005 (Reference 33), states that this commitment is complete.
20	Verify the RCIC start time assumed in the SCCA and complete training of operations crews on the revised procedure.	BVY 04-107 September 30, 2004 (Reference 18)	x		December 1, 2004*	* Entergy letter BVY 04-131, dated December 8, 2004 (Reference 23), states that this commitment is complete.

No.	COMMITMENT	REFERENCE (Energy letter number and date)	TYPE		SCHEDULED COMPLETION DATE	NRC COMMENTS
			One-time Action	Continuing Compliance		
21	<p>Entergy has established administrative controls to assure performance of a once per operating cycle tabletop review of the procedures that complete the actions to repower a VYNPS 4KV bus from the VHS. Pursuant to discussions with co-host REMVEC, a system-wide annual tabletop review will take place in October 2005. During this meeting Entergy will lead a tabletop review of all actions required to support the restoration of 4KV AC to VYNPS. This review will review the interfaces with the operator of VHS and the regional grid operator to verify that roles and responsibilities and timelines are understood and that there have been no changes that would impact the assumption in the VYNPS SBO coping strategy. Entergy will also provide the participants with additional insights regarding offsite power issues for nuclear power stations including plant response to and consequences of a SBO.</p>	<p>BVY 05-072 August 1, 2005 (Reference 31)</p>		x	October 31, 2005*	* Date represents first tabletop review.

No.	COMMITMENT	REFERENCE (Entergy letter number and date)	TYPE		SCHEDULED COMPLETION DATE	NRC COMMENTS
			One-time Action	Continuing Compliance		
22	<p>Training on the changes to OP 2124 and OT 3122 is currently underway. Once the training cycle is complete (scheduled for September 1, 2005), the procedures will be revised and issued for use.</p> <p>Various operating, surveillance and administrative procedures will be revised to incorporate a higher condensate storage tank inventory limit as either a precaution or an administrative limit by October 15, 2005.</p>	BVY 05-072 August 1, 2005 (Reference 31)	x		October 15, 2005	
23	Visual inspection of steam dryer.	BVY 05-083 September 10, 2005 (Reference 33)	x		RFO-26, RFO-27, and RFO-28	
24	Modification of the four susceptible isokinetic sample probes in the condensate and feedwater systems.	BVY 05-083 September 10, 2005 (Reference 33)	x		RFO-25	