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**To:** "Rick Ennis" <RXE@nrc.gov>  
**Date:** 12/8/05 4:20PM  
**Subject:** Comments on DRAFT EA

Attached is Entergy's letter providing comments on the Draft Environmental Assessment.  
<<BVY 05-108 final.pdf>>

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Vermont Yankee Project Manager, NRR  
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December 8, 2005

Docket No. 50-271  
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Chief, Rules and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Mail Stop T-6D59  
Washington, DC 20555-0001

**Subject: Vermont Yankee Nuclear Power Station  
Comments on the Draft Environmental Assessment and Finding of  
No Significant Impact Related to Proposed Extended Power Uprate**

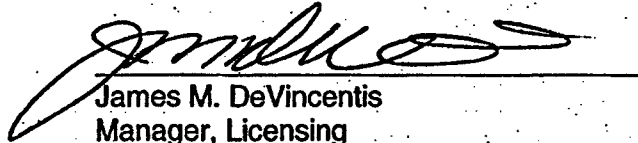
- References:**
- 1) Federal Register: "Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc.; Vermont Yankee Nuclear Power Station Draft Environmental Assessment and Finding of No Significant Impact Related to the Proposed License Amendment to Increase the Maximum Reactor Power Level," (Volume 70, Number 216), Pages 68106-68114, November 9, 2005
  - 2) Entergy letter to U.S. Nuclear Regulatory Commission, "Vermont Yankee Nuclear Power Station, License No. DPR-28 (Docket No. 50-271), Technical Specification Proposed Change No. 263, Extended Power Uprate," BVY 03-80, September 10, 2003
  - 3) U.S. Atomic Energy Commission, "Final Environmental Statement Related to the Operation of the Vermont Yankee Nuclear Power Station, Docket No. 50-271," July 1972

In Reference 1, the NRC staff published the Draft Environmental Assessment and Finding of No Significant Impact (Draft EA) related to Entergy's request for a license amendment (Reference 2, as supplemented) to increase the maximum reactor power level of the Vermont Yankee Nuclear Power Station (VYNPS) from 1593 megawatts thermal (MWt) to 1912 MWt. Entergy has completed its review of the Draft EA and has comments related to its content. Those comments are provided as Attachment 1 to this letter.

An assessment of the environmental impacts of the proposed extended power uprate (EPU) was performed by Entergy as part of the license application. The assessment confirmed that the environmental effects of the proposed EPU are consistent with those determined in 1972 and documented in the original Final Environmental Statement (Reference 3). Entergy agrees with the NRC staff's analysis and conclusion documented in the Draft EA. That is, the proposed action will not have a significant effect on the quality of the human environment.

This submittal does not include any new commitments. If you have any questions or require additional information, please contact me at (802) 258-4236.

Sincerely,



James M. DeVincentis  
Manager, Licensing  
Vermont Yankee Nuclear Power Station

Attachment (1)

cc: Mr. Samuel J. Collins  
Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
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Mr. Richard B. Ennis, Project Manager  
Project Directorate I  
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Mr. David O'Brien, Commissioner  
VT Department of Public Service  
112 State Street - Drawer 20  
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**Attachment 1**

**Vermont Yankee Nuclear Power Station**

**Comments on the Draft Environmental Assessment and Finding of  
No Significant Impact Related to Proposed Extended Power Uprate**

Total number of pages in Attachment 1  
(excluding this cover sheet) is 1.

ENTERGY COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT FOR VERMONT YANKEE  
NUCLEAR POWER STATION RELATED TO EXTENDED POWER UPRATE

No.	Location (Federal Register page) / Text	Entergy Comment
1	(68108) "In the helper-cycle mode [of the circulating water system], only a portion of the cooling water discharge flow is cycled through the cooling towers before being discharged to the Connecticut River."	<p>The "helper-cycle" mode of operation of the circulating water system is available; however, because of the provisions of the National Pollutant Discharge Elimination System (NPDES) Permit, the system is operated in a "hybrid" cycle as described in the Vermont Yankee Nuclear Power Station (VYNPS) Updated Final Safety Analysis Report (UFSAR) sections 11.6 and 11.9.</p> <p>The circulating water system is designed to operate in any one of three modes of operation: open, closed, or hybrid cycle. In the hybrid cycle, all of the circulating water flow is cycled through the cooling towers, but only a portion is discharged to the river while the remainder is recycled.</p> <p>The mode in which the circulating water system operates is a function of river temperature and flow.</p>
2	(68108) "Entergy's transmission line right-of-way maintenance practices, including the management of vegetation growth, would not change."	Entergy does not own or maintain the transmission lines. The lines are owned and operated by different transmission operators who ensure that proper ground clearances are met.
3	(68108) In the description of "Cooling Tower Impacts."	It should be noted that Entergy's original environmental assessment for Extended Power Uprate (EPU) was based on the use of 125 horsepower cooling tower fan motors. In fact, twenty-one of the twenty-two cooling tower fan motors were increased in size from 125 horsepower to 200 horsepower. This upgrade will improve cooling tower performance, and lessen aesthetic impacts due to plume size associated with increased cooling tower operation at EPU. The conclusions in the Draft Environmental Assessment regarding cooling tower operation (including noise) are correctly stated.