

From: "Daflucas, Ronda" <rdafluc@entergy.com>
To: "Rick Ennis" <RXE@nrc.gov>
Date: 12/8/05 4:20PM
Subject: Comments on DRAFT EA

11/9/05
70FR68106

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

2

Ronda Daflucas
Vermont Yankee Project Manager, NRR
Entergy Nuclear Operations, Inc.
802-258-4232

CC: "Gucwa, Len" <LGUCW90@prod.entergy.com>, "Nichols, Craig" <cnicho1@prod.entergy.com>, "Hobbs, Brian" <bhobbs@prod.entergy.com>, "Devincentis, Jim" <jdevinc@prod.entergy.com>, "Faison, Charlene" <CFaison@entergy.com>, "McCann, John" <jmccan1@entergy.com>

RULES AND DIRECTIVES
BRANCH
USNRC

2005 DEC 12 AM 9:35

RECEIVED

SFSP Review Complete
Template - ADH-013

E-REDS = ADH-03
Call = R. Ennis (RXE)

Mail Envelope Properties (4398A375.44A : 17 : 62538)

Subject: Comments on DRAFT EA
Creation Date: 12/8/05 4:19PM
From: "Daflucas, Ronda" <rdafluc@entergy.com>

Created By: rdafluc@entergy.com

Recipients

nrc.gov

owf4_po.OWFN_DO

RXE (Rick Ennis)

entergy.com

jmccan1 CC (John McCann)

CFaison CC (Charlene Faison)

prod.entergy.com

jdevinc CC (Jim Devincentis)

bhobbs CC (Brian Hobbs)

cnicho1 CC (Craig Nichols)

LGUCW90 CC (Len Gucwa)

Post Office

owf4_po.OWFN_DO

Route

nrc.gov

entergy.com

prod.entergy.com

Files

MESSAGE

TEXT.htm

BVY 05-108 final.pdf

Mime.822

Size

218

1834

159877

223486

Date & Time

12/08/05 04:19PM

Options

Expiration Date: None

Priority: Standard

Reply Requested: No

Return Notification: None

Concealed Subject: No

Security: Standard



December 8, 2005

Docket No. 50-271
BVY 05-108
TAC No. MC0761

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
King of Prussia, PA 19406-1415

Mr. Richard B. Ennis, Project Manager
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O 8 B1
Washington, DC 20555

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

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."	<p>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.</p>
3	(68108) In the description of "Cooling Tower Impacts."	<p>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.</p>