

**From:** Jonathan Rowley  
**To:** David Jeng; Hansraj Ashar; John Fair; John Ma; Kaihwa Hsu; Mark Hartzman; Michael Morgan; Richard Emch; Robert Palla  
**Date:** 06/09/2006 12:16:38 PM  
**Subject:** Vermont Yankee contention input

The staff has recently received numerous petitions to intervene in the Vermont Yankee Nuclear Power Station license renewal process. These contentions need to be addressed by the audit team and technical staff in their areas of expertise. Input is need by OGC so that each contention can be properly and appropriately responded.

Below is a list of the contentions and associated parties.

#### **NEC Contentions**

1. Entergy failed to assess impacts to water quality.
2. Entergy's license renewal application does not include a plan to manage aging due to metal fatigue during the period of extended operation.
3. Entergy's license renewal application does not include an adequate plan to monitor and manage aging of the steam dryer during the period of extended operation.
4. Entergy's license renewal application does not include an adequate plan to monitor and manage aging of plant piping due to flow-accelerated corrosion during the period of extended operation.
5. The license renewal application does not state an adequate plan to manage and monitor aging of the condenser.
6. Primary containment corrosion including, but not limited to, the dry well.

#### **State of Massachusetts Contention**

1. The environmental report for renewal of the Vermont Yankee Nuclear Power Plant fails to satisfy NEPA because it does not address the environmental impacts of severe spent fuel pool accidents.

#### **State of Vermont Contentions**

1. The application must be denied because the applicant has failed to provide the necessary information with regard to the age management of primary containment concrete in accordance with 10 CFR 54.21 such that the Commission cannot find that 10 CFR 54.29(a) is met.
2. The application must be denied because the applicant has failed to comply with the requirements of 10 CFR 51.53(c)(3) (iv) by falling to include new and significant information regarding the substantial likelihood that spent fuel will have to be stored at the Vermont Yankee site longer than evaluated in the GEIS and perhaps indefinitely and thus has failed to provide the necessary environmental information with regard to onsite land use in accordance with 10 CFR 54.23 such that the Commission cannot find that the applicable requirements of Subpart A of 10 CFR Part 50 have been satisfied (10 CFR 54.29(b)).
3. The application must be denied because the applicant has failed to fully identify plant systems, structures and components that are non-safety-related systems, structures, and components in the security area whose failure could prevent satisfactory accomplishment of any of the functions of safety-related systems, structures and components in accordance with 10 CFR 54.4(a)(2), such that the Commission cannot find that 10 CFR 54.29(a) is met.

I ask that Rich Emch address NEC contention #1 and the Mass. attorney general contention.

**Robert Hsu**, I ask that you address NEC contention #2,#3, and #4.

**Mark Hartzman and John Fair**, I ask that you address NEC contention #2 in conjunction with Robert.

**Mike Morgan**, I ask that you address NEC contention #5 and Vermont contentions #2 and #3.

**Robert Palla**, I ask that you address the Mass. AG contention in conjunction with Rich and VT contention #2 in conjunction with Mike. Both appear to be SAMA related and could use your vast knowledge of that area.

**John Ma**, I ask that you address NEC contention #6, as you were assigned to review the portions of the VY LRA related to the drywell.

**Hans Ashar and David Jeng**, I ask that you address Vermont contention #1 as you are our experts in primary containment.

Attached are pdf files of each letter submitted. I can and will provide hard copies of whatever file is requested, along with any supplemental items referenced in the petitions you may need.

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**CC:** Jacob Zimmerman; Johnny Eads; Mitzi Young; Noel Dudley; Stephen Hoffman

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**Subject:** Vermont Yankee contention input  
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