



**Entergy Nuclear Northeast**

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September 26, 2006

BVY 06-087

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: **Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
Update to information Related to 10CFR50.63 Licensing Basis**

- References:
- 1) Letter USNRC to Entergy "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Extended Power Uprate (TAC No. MC0761), NVY 06-028 dated March 2, 2006
  - 2) Letter Entergy to USNRC, "Vermont Yankee Nuclear Power Station, Technical Specification Proposed Change No. 263, Supplement No. 30, Extended Power Uprate – Response to Request for Additional Information," BVY 05-072, dated August 1, 2005

In Reference (1), NRC approved changes to Entergy's licensing bases relative to satisfying the requirements of 10CFR50.63 "Loss of all Alternating Current Power" (Station Blackout). This relied in part on information Entergy supplied in Reference (2). In Reference (2), Entergy provided a discussion of the agreements between Entergy and other entities that were in place to ensure that alternating current (AC) power would be available following a Station Blackout (SBO). These agreements included an Alternate AC Source Agreement between Entergy and Green Mountain Power (GMP) and an agreement between GMP and TransCanada (TC) owners and operators of the Vernon Hydro Station. Entergy has become aware, through GMP that TC has notified them of their intent to terminate their contract with GMP. It is our understanding that TC is taking this action because it believes that its obligations are appropriately established by ISO New England requirements. Based on this, GMP has notified Entergy that they will no longer be in a position to continue to satisfy the provisions of our agreement.

Attachment 1 provides a discussion of the transmission service agreements that are in place to provide reasonable assurance that Entergy will be provided the required SBO power consistent with the current licensing basis. Entergy does not view this change as a change to our regulatory commitments and does not feel that any NRC action is needed. This letter is provided to update information that was previously provided to reflect changes in the SBO licensing basis.

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There are no new regulatory commitments contained in this submittal.

If you have any questions or require additional information, please contact Mr. James DeVincentis at (802) 258-4236.

Sincerely,



Ted A. Sullivan  
Site Vice President  
Vermont Yankee Nuclear Power Station

Attachments (1)

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**Attachment 1**

**Vermont Yankee Nuclear Power Station  
Description of Transmission Service Agreements**

## **Description of Transmission Service Agreements**

TransCanada (TC) owns the Vernon Hydro Station (VHS) and provides power to the grid in accordance with Federal Energy Regulatory Commission (FERC) approved Independent System Operator Inc. (ISO) transmission tariffs. The VHS output is delivered to the Vernon Vermont substation which is owned and operated by National Grid (formerly New England Power). This power is provided to Green Mountain Power (GMP) who in turns provides the power to Entergy in accordance with the "Service Agreement for Network Integration Transmission Service Between New England Power Company and Green Mountain Power Corporation", dated July 31, 2002 (Reference 1). This agreement is effective until December 12, 2012.

VHS is designated as a "Black Start" facility in accordance with ISO New England's FERC Transmission Tariff No.3 Schedule 16 "System Restoration and Planning Service from Generators" (Reference 2). VHS has been designated as a Black Start facility, therefore, TC has agreed to a number of requirements including:

- 1) VHS has the capability to be started without the need for any outside power sources in such a way that it will meet all of the requirements stated in ISO New England's Operating procedure 11 "Black Start Capability Eligibility & Testing Requirements."
- 2) VHS is designated Black Start Capable, and accordingly is listed as a Black Start unit in Operating Procedure 11 (Reference 3).
- 3) TC committed to maintain and test VHS as a "Black Start" facility for a period of three years from the date of the last annual black start restoration study and agreed that future commitments are for a period of at least three years.
- 4) TC agreed to give at least one-year notice if they will no longer be able to provide black start power and that this notice would not truncate the commitment to provide power for the period of time already committed to unless it is due to a decision to retire the unit.

Following a blackout event the ISO will control and direct the restoration of power in accordance with ISO Operating Procedure No. 6 "System Restoration" (Reference 4). Appendix A to this procedure provides System Restoration Criteria that are used by the ISO to direct restoration efforts. This includes the dispatch of generators and reenergization of substations, lines and loads. This Appendix states in part "... The most critical power requirement after a blackout is the assurance of reliable shutdowns of nuclear generators. The NRC requires these units to have reliable on-site power sources for shutdown operations. The expeditious restoration of alternative off-site AC power sources to nuclear units is imperative to promote the continued reliability of shutdown operations..." These provisions are discussed and emphasized at regular meetings and at the annual system restoration exercises that Entergy and other ISO New England control area units participate in.

The "Service Agreement for Network Integration Transmission Service Between New England Power Company and Green Mountain Power Corporation" provides assurances that the line that provides power to Entergy's Vermont Yankee station will be energized during normal and emergency operations in accordance with good utility practices and reasonable maintenance schedules subject to the conditions of their rules and regulations. Entergy maintains an awareness of the power supply and has administrative controls to assess the risk should the line or multiple VHS generators need to be taken out of service.

Entergy has a regulatory commitment (accepted by NRC in Reference 5) to conduct once per operating cycle table-top discussion with the parties involved with blackout system restoration and is confident that we would be made aware of any significant changes to the documents that are discussed above. In addition, Entergy also participates in quarterly ISO sponsored coordination meetings.

Based on this, Entergy believes that the above FERC approved system restoration requirements are adequate to provide reasonable assurance that AC power would be restored to Vermont Yankee consistent with the assumptions in our Current Licensing Basis.

**Attachment 1 References:**

1. New England Power Company, FERC Electric Tariff, "Service Agreement for Network Integration Transmission Service Between New England Power Company and Green Mountain Power Corporation", dated July 31, 2002
2. Independent System Operator New England Inc. (ISO) FERC Transmission Tariff No.3 Schedule 16 "System Restoration and Planning Service from generators", dated February 1, 2005
3. ISO New England Operating Procedure No. 11 "Black Start Capability Testing requirements"
4. ISO New England Operating Procedure No. 6 "System Restoration"
5. Letter USNRC to Entergy "Vermont Yankee Nuclear Power Station – Issuance of Amendment Re: Extended Power Uprate (TAC No. MC0761), NVY 06-028, dated March 2, 2006