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Michael R. Kansler
President

October 12, 2006
ENOC-2006-00021
ENO 2.06.083

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

SUBJECT: 120-Day Response to NRC June 20, 2006 Order Requiring Compliance with Key Radiological Protection Mitigation Strategies [EA-06-137]

Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-59

- REFERENCES:**
1. Orders from USNRC to Holders of Licensees for Operating Power Reactors Entergy Nuclear Operations, Inc. dated June 20, 2006, "Order Requiring Compliance with Key Radiological Protection Mitigation Strategies"
 2. Letters from USNRC to Holders of Licensees for Operating Power Reactors dated August 28, 2006 regarding "Order Requiring Compliance with Key Radiological Protection Mitigation Strategies"

Dear Sir or Madam:

Pursuant to the requirements of 10 CFR 2.202(a)(2), Entergy Nuclear Operations, Inc. (ENO) as operator of the FitzPatrick, Pilgrim and Vermont Yankee Nuclear Power Plants, hereby submits the 120-day required response to the referenced Orders to the Secretary of the Commission for filing. ENO also takes this opportunity to respond to subsequent correspondence (Reference 2) regarding the implementation of that Order.

On June 20, 2006, the U. S. Nuclear Regulatory Commission (NRC or the Commission) issued an Order that modified the licenses of the FitzPatrick, Pilgrim and Vermont Yankee facilities. The Order required ENO to implement certain key radiological protection mitigation strategies

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that are identified in Attachment 2 to the Order and to incorporate them into security plans, safeguards contingency plans, guard training and qualification plans, and/or emergency plans, as appropriate. The Order also required ENO to complete the changes to site plans necessary to fully implement the key mitigation strategies and notify the Commission within 120 days of the date of the Order by sending the changed plan pages to the NRC.

ENO hereby confirms that the key radiological protection mitigation strategies applicable to each license (described in Attachment 2 to the Enclosure to the Reference 1 letter) have been incorporated into site procedures, and initial and recurring operations staff training programs, as required by the Orders.

Subsequent to issuing the Order, the NRC determined (Reference 2) that, instead of incorporating the required strategies in the aforementioned plans, the following license condition would be sufficient to satisfy the Order's substantive requirements:

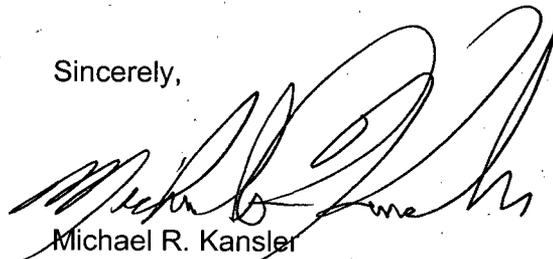
[Licensee] shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

ENO agrees with the NRC's proposal to amend the operating licenses to include this new condition. ENO understands that in lieu of the plan changes detailed in the Order, the NRC will issue a conforming amendment (essentially identical to the condition above) to the FitzPatrick, Pilgrim and Vermont Yankee Operating Licenses to satisfy the Orders' substantive requirements.

This letter contains no new commitments. Should you have any questions or require additional information please contact Ms. Charlene Faison at (914) 272-3378.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 12th day of October 2006.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael R. Kansler", is written over a faint, illegible typed name.

Michael R. Kansler
President
Entergy Nuclear Operations, Inc.

cc: Next page.

cc: Office of the Secretary (NRC)
Assistant General Counsel for Materials Litigations and Enforcement (NRC)
Mr. J. E. Dyer (NRC)
Mr. S. J. Collins (NRC – Region I)
NRC Resident Inspectors (JAF, VY, PNPS, IPEC)
Mr. J. P. Boska, P. M. (IP2, IP3, JAF)
Mr. J. J. Shea, P. M. (PNPS, VY)
Mr. Peter R. Smith (NYSERDA)
Mr. Paul Eddy (NYSDPS)
Mr. David O'Brien (VDPS)
Mr. Steven Lyman (Oswego County)
Town Supervisor (Scriba NY)
Mr. James Volz (VTPSB)
Chairman, Board of Selectmen (Vernon, VT)
Mr. G. Dana Bisbee, (Dep. Att. General)
Ms. Carla A. White (VTDOH)

bcc: Mr. M. R. Kansler (WPO)
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