

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

August 10, 2007 (1:19pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

In the Matter of )

ENTERGY NUCLEAR VERMONT YANKEE, LLC )  
and ENTERGY NUCLEAR OPERATIONS, INC. )Docket No. 50-271-LR  
ASLB No. 06-849-03-LR

Vermont Yankee Nuclear Power Station )

**NEW ENGLAND COALITION, INC. (NEC) REPLY TO ENTERGY AND NRC  
STAFF ANSWERS TO NEC MOTION TO FILE A TIMELY NEW OR  
AMENDED CONTENTION**

Pursuant to 10 C.F.R. § 2.309(h)(2) and the Initial Scheduling Order ¶ 5(A), New England Coalition, Inc. (NEC) files the following reply to the Entergy and NRC Staff Answers to NEC's Motion to File a Timely New or Amended Contention.

NEC agrees with Entergy that further proceedings on NEC's New or Amended Contention addressing Entergy's preliminary environmentally assisted metal fatigue analysis should be held in abeyance pending NEC's review of Entergy's final environmentally assisted metal fatigue analysis. NEC received Entergy's reports of this final analysis on August 3, 2007. NEC may file a new Contention addressing them by September 3, 2007, which would supersede NEC's New or Amended Contention. Initial Scheduling Order ¶ 5(B).

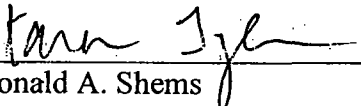
NEC's original Contention 2 should also be held in abeyance, pending resolution of NEC's new Contention concerning the validity of Entergy's revised fatigue analysis. NEC disagrees with Entergy that NEC's original Contention 2 should now be dismissed. NEC's original Contention 2 is that Entergy's License Renewal Application (LRA) does not include any specific plan to monitor and manage reactor components identified in

LRA Table 4.3-3 as vulnerable to environmentally assisted fatigue failure during the license renewal period. If NEC prevails in its new Contention that Entergy's revised fatigue analysis fails to demonstrate that these components are safe from fatigue failure, then NEC's Contention 2 remains relevant, and the Board should adjudicate it.

August 10, 2007

New England Coalition

by:

  
\_\_\_\_\_  
Ronald A. Shems  
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For the firm

Attorneys for NEC

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

ENTERGY NUCLEAR VERMONT YANKEE, LLC )  
and ENTERGY NUCLEAR OPERATIONS, INC. )

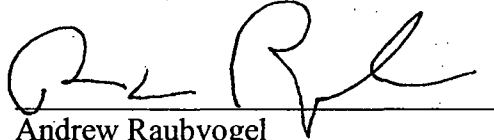
) Docket No. 50-271-LR  
) ASLB No. 06-849-03-LR  
)

Vermont Yankee Nuclear Power Station )

**NOTICE OF APPEARANCE OF ANDREW RAUBVOGEL**

Andrew Raubvogel, an attorney in good standing admitted to practice before the courts of the State of Vermont, hereby enters his appearance as counsel on behalf of New England Coalition, Inc. in the above-captioned matter.

Respectfully Submitted,



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Counsel for NEC

Dated: August 9, 2007

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
Entergy Nuclear Vermont Yankee, LLC	)	Docket No. 50-271-LR
and Entergy Nuclear Operations, Inc.	)	ASLBP No. 06-849-03-LR
	)	
(Vermont Yankee Nuclear Power Station)	)	

CERTIFICATE OF SERVICE

I, Michelle Cronin, hereby certify that copies of NEW ENGLAND COALITION, INC.'S (NEC) REPLY TO ENTERGY AND NRC STAFF ANSWERS TO NEC MOTION TO FILE A TIMELY NEW OR AMENDED CONTENTION and NOTICE OF APPEARANCE OF ANDREW RAUBVOGEL in the above-captioned proceeding were served on the persons listed below, by U.S. Mail, first class, postage prepaid; by Fed Ex overnight to Judge Elleman; and, where indicated by an e-mail address below, by electronic mail, on the 10th day of August, 2007.

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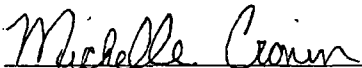
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