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February 5, 2008
BVY 08-008

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Washington, DC 20555-0001

- References:
- 1) Letter, Entergy to USNRC, "Vermont Yankee Nuclear Power Station, License No. DPR-28, License Renewal Application," BVY 06-009, dated January 25, 2006
 - 2) Letter, Entergy to USNRC, "Update of Aging Management Program Audit Q&A Database," BVY 07-079, dated November 14, 2007
 - 3) Letter, USNRC to Entergy, "Update on Extension of Schedule for the Conduct of Review of the Vermont Yankee Nuclear Power Station License Renewal Application," NVY 07-157, dated November 27, 2007
 - 4) Letter, Entergy to USNRC, "License Renewal Application, Amendment 33," BVY 07-082, dated December 11, 2007
 - 5) Letter, Entergy to USNRC, "License Renewal Application, Amendment 34," BVY 08-002, dated January 30, 2008

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
License Renewal Application, Amendment 35**

On January 25, 2006, Entergy Nuclear Operations, Inc. and Entergy Nuclear Vermont Yankee, LLC (Entergy) submitted Reference (1), the License Renewal Application (LRA) for the Vermont Yankee Nuclear Power Station (VYNPS).

VYNPS submitted Reference (2) following an NRC audit of the VYNPS Aging Management Program and subsequently received Reference (3), which included an NRC Request for Additional Information. References (4) and (5), respectively, provided the initial response to Reference (3) and later clarifications to that response. Additional clarification and details regarding recirculation nozzle Cumulative Usage Factor (CUF) and water chemistry effects are provided in Attachments 1 and 2 to this letter. VYNPS information meeting the NRC's position on Extended Power Uprate (EPU) operating experience evaluation for Aging Management Programs is also discussed below.

VYNPS had not yet entered operation at EPU levels at the time Reference (1) was submitted. EPU power ascension began in March of 2006. To ensure that operating experience at EPU levels is properly addressed by aging management programs, Entergy will perform an evaluation of operating experience at EPU levels prior to the period of extended operation. In addition to VYNPS operating experience, the evaluation will include operating experience from other BWR plants operating at EPU levels.

AIT
NRR

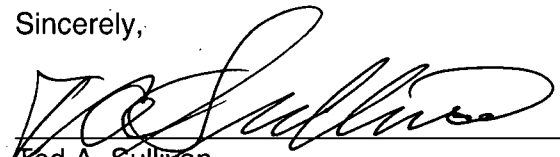
This is a new commitment, and has been entered as Commitment #51 on the VYNPS License Renewal Commitment List, Revision 9 (Attachment 3).

Should you have any questions concerning this submittal, please contact Mr. David Mannai at (802) 451-3304.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2008.

Sincerely,



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

Attachment 1: Additional Information Regarding Recirculation Nozzle CUF
Attachment 2: Additional Information Regarding Water Chemistry Effects
Attachment 3: License Renewal Commitment List, Revision 9

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Attachment 1

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

License Renewal Application

Amendment 35

Additional Information Regarding Recirculation Nozzle CUF

**VERMONT YANKEE NUCLEAR POWER STATION
LICENSE RENEWAL APPLICATION AMENDMENT 35
ATTACHMENT 1**

Additional Information Regarding Recirculation Nozzle CUF

NRC Request:

Demonstrate why the confirmatory analysis for the feedwater nozzle bounds the geometry of the recirculation outlet nozzle.

Response:

The feedwater nozzle was chosen for the confirmatory analysis since it has the largest number of, and most severe, transients and the highest calculated fatigue usage of the three nozzles which used the VY fatigue analysis approach. The analysis of the feedwater nozzle is bounding for the recirculation outlet nozzle since the calculated usage factors and thermal transient stresses are significantly less than those for the feedwater nozzle.

As pointed out during the January 8, 2008 presentation to the NRC Staff, the recirculation outlet nozzle has a different geometry (i.e., "skewed") as compared to the other nozzles. However, the feedwater nozzle configuration remains conservative and bounding when compared to the recirculation outlet nozzle configuration for the following reasons:

- The previous comparisons of nozzle corner stress factors from BWRVIP-108, which included evaluation of a recirculation outlet nozzle, demonstrate that the recirculation outlet nozzle configuration does not provide results that are significantly different from the other nozzle configurations.
- The transients experienced by the recirculation outlet nozzle are significantly less severe and less numerous than the transients that affect the feedwater nozzle.
- The most significant thermal transient (improper start causing reverse flow) was modeled directly in the Finite Element Model due to its unique characteristics.
- In the nozzle corner, the thermal stresses are small compared to the pressure stresses.
- The previous analyses for all three nozzles for VY yielded significantly lower fatigue usage for the recirculation outlet nozzle compared to the feedwater nozzle.
- Industry experience for the BWR fleet has repeatedly demonstrated that the recirculation outlet nozzle fatigue usage is significantly lower than feedwater nozzle fatigue usage.

Attachment 2

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

License Renewal Application

Amendment 35

Additional Information Regarding Water Chemistry Effects

**VERMONT YANKEE NUCLEAR POWER STATION
LICENSE RENEWAL APPLICATION AMENDMENT 35
ATTACHMENT 2**

Additional Information Regarding Water Chemistry Effects

NRC Request:

Describe how water chemistry effects were accounted for in the evaluation of environmentally assisted fatigue.

Response:

Per Section X.M1 of NUREG 1801 (GALL Report) the environmentally assisted fatigue (EAF) evaluations used appropriate Fatigue Life Correction Factors (F_{en}) calculated using the methodology in NUREG/CR-6583 for carbon and low alloy steels and NUREG/CR-5704 for stainless steels.

For carbon and low alloy steels the F_{en} factor relationships are shown on page 69 of NUREG/CR-6583. As shown on page 60 of NUREG/CR-6583, the input values used to develop the F_{en} factors are sulfur content, strain rate, temperature, and dissolved oxygen content in the fluid. Input values for these parameters were chosen to maximize the F_{en} factors calculated for all components.

The F_{en} factor relationship for stainless steels is shown on page 31 of NUREG/CR-5704. As shown on page 25 of NUREG/CR-5704, the input values used to develop the F_{en} factors are strain rate, temperature, and dissolved oxygen content in the fluid. Similar to the carbon and low alloy steel calculations, the input values were chosen to maximize the F_{en} factors.

The inputs were selected as follows:

- For the carbon and low alloy steel expressions, the transformed sulfur content parameter was set equal to the maximum value of 0.015 to maximize the effects of this parameter.
- For all expressions, the transformed strain rate parameter was set equal to the minimum strain rate (i.e., less than 0.001%/sec) for all transients to maximize the effects of this parameter.
- For all expressions, the transformed temperature parameter was computed using 550°F for all locations. This temperature envelopes normal operating temperatures to maximize the effects of this parameter, and is very conservative for feedwater temperature.
- For the transformed dissolved oxygen parameter, dissolved oxygen (DO) data was taken from recorded plant data for the feedwater line. For all other locations evaluated in the reactor coolant system, the EPRI BWRVIA code was used to determine DO levels. The EPRI BWRVIA model was used to determine DO at component locations at original licensed power (OLP) for both BWR normal water chemistry (NWC) and noble metal water chemistry (NMCA+HWC). Also, current licensed power with NMCA+HWC was evaluated.

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ATTACHMENT 2**

For the purposes of ensuring that the DO effects on F_{en} are conservative and bounding with respect to water chemistry, the F_{en} values used accounted for variations in plant recorded feedwater DO data. It is noted that excursions observed in the plant data used are small in number and are of short duration. Approximately 13 years of recorded feedwater DO measurements, including excursions, were evaluated for input to the EAF analysis. A DO value (50 ppb) was used to calculate bounding F_{en} value for the feedwater piping. This represents the mean of the measured data plus one standard deviation.

For locations in the reactor coolant system, the BWRVIA model was run varying the DO content for the power/water chemistry conditions discussed above. The results of these sensitivity studies showed that the resulting variations in DO at component locations are significantly less than the changes input to the feedwater DO. The variation of feedwater DO (mean plus one standard deviation) was evaluated. This resulted in less than a 2% change in the bounding F_{en} used in the EAF analysis for the low alloy steel components in the beltline and lower sections of the reactor vessel. There is no effect on the bounding F_{en} values from the input feedwater DO variations for the stainless steel components.

The F_{en} factors are determined using several parameters and, collectively, these parameters were chosen to conservatively maximize their contribution. The F_{en} factors are bounding for each location based on all of the input values. The bounding F_{en} factors for each location and material were used for all stress range pairs in the cumulative usage factor calculations.

Attachment 3

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

License Renewal Application

Amendment 35

**License Renewal Commitment List
Revision 9**

**VERMONT YANKEE NUCLEAR POWER STATION
LICENSE RENEWAL COMMITMENT LIST
REVISION 9**

During the development and review of the Vermont Yankee Nuclear Power Station License Renewal Application, Entergy made commitments to provide aging management programs to manage the effects of aging on structures and components during the extended period of operation. The following table lists these license renewal commitments, along with the implementation schedule and the source of the commitment.

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
1	Guidance for performing examinations of buried piping will be enhanced to specify that coating degradation and corrosion are attributes to be evaluated.	March 21, 2012	BVY 06-009	B.1.1 Audit Items 5 & 130
2	Fifteen (15) percent of the top guide locations will be inspected using enhanced visual inspection technique, EVT-1, within the first 18 years of the period of extended operation, with at least one-third of the inspections to be completed within the first 6 years and at least two-thirds within the first 12 years of the period of extended operation. Locations selected for examination will be areas that have exceeded the neutron fluence threshold.	As stated in the commitment	BVY 06-009	B.1.7 Audit Item 14
3	The Diesel Fuel Monitoring Program will be enhanced to ensure ultrasonic thickness measurement of the fuel oil storage and fire pump diesel storage (day) tank bottom surfaces will be performed every 10 years during tank cleaning and inspection.	March 21, 2012	BVY 06-009 BVY 07-018	B.1.9 and regional inspection
4	The Diesel Fuel Monitoring Program will be enhanced to specify UT measurements of the fuel oil storage and fire pump diesel storage (day) tank bottom surfaces will have acceptance criterion $\geq 60\%$ Tnom.	March 21, 2012	BVY 06-009 BVY 07-018	B.1.9 and regional inspection

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
5	The Fatigue Monitoring Program will be modified to require periodic update of cumulative fatigue usage factors (CUFs), or to require update of CUFs if the number of accumulated cycles approaches the number assumed in the design calculation.	March 21, 2012	BVY 06-009	B.1.11
6	A computerized monitoring program (e.g., FatiguePro) will be used to directly determine cumulative fatigue usage factors (CUFs) for locations of interest.	March 21, 2012	BVY 06-009	B.1.11
7	The allowable number of effective transients will be established for monitored transients. This will allow quantitative projection of future margin.	March 21, 2012	BVY 06-009	B.1.11
8	Procedures will be enhanced to specify that fire damper frames in fire barriers will be inspected for corrosion. Acceptance criteria will be enhanced to verify no significant corrosion.	March 21, 2012	BVY 06-009	B.1.12.1 Audit Items 35, 151, 152, 153 and 159
9	Procedures will be enhanced to state that the diesel engine sub-systems (including the fuel supply line) will be observed while the pump is running. Acceptance criteria will be enhanced to verify that the diesel engine did not exhibit signs of degradation while it was running; such as fuel oil, lube oil, coolant, or exhaust gas leakage.	March 21, 2012	BVY 06-009	B.1.12.1 Audit Items 33, 150 & 155

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
10	Fire Water System Program procedures will be enhanced to specify that in accordance with NFPA 25 (2002 edition), Section 5.3.1.1.1, when sprinklers have been in place for 50 years a representative sample of sprinkler heads will be submitted to a recognized testing laboratory for field service testing. This sampling will be repeated every 10 years.	March 21, 2012	BVY 06-009	B.1.12.2
11	The Fire Water System Program will be enhanced to specify that wall thickness evaluations of fire protection piping will be performed on system components using non-intrusive techniques (e.g., volumetric testing) to identify evidence of loss of material due to corrosion. These inspections will be performed before the end of the current operating term and during the period of extended operation. Results of the initial evaluations will be used to determine the appropriate inspection interval to ensure aging effects are identified prior to loss of intended function.	March 21, 2012	BVY 06-009	B.1.12.2 Audit Items 37 & 41
12	Implement the Heat Exchanger Monitoring Program as described in LRA Section B.1.14.	March 21, 2012	BVY 06-009	B.1.14
13	Implement the Non-EQ Inaccessible Medium-Voltage Cable Program as described in LRA Section B.1.17.	March 21, 2012	BVY 06-009	B.1.17
14	Implement the Non-EQ Instrumentation Circuits Test Review Program as described in LRA Section B.1.18.	March 21, 2012	BVY 06-009	B.1.18
15	Implement the Non-EQ Insulated Cables and Connections Program as described in LRA Section B.1.19.	March 21, 2012	BVY 06-009	B.1.19

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
16	Implement the One-Time Inspection Program as described in LRA Section B.1.21.	March 21, 2012	BVY 06-009 BVY 07-009	B.1.21 Audit Items 239, 240, 330, 331
17	Enhance the Periodic Surveillance and Preventive Maintenance Program to assure that the effects of aging will be managed as described in LRA Section B.1.22.	March 21, 2012	BVY 06-009	B.1.22 Audit Item 377
18	Enhance the Reactor Vessel Surveillance Program to proceduralize the data analysis, acceptance criteria, and corrective actions described in the program description in LRA Section B.1.24.	March 21, 2012	BVY 06-009	B.1.24
19	Implement the Selective Leaching Program as described in LRA Section B.1.25.	March 21, 2012	BVY 06-009	B.1.25
20	Enhance the Structures Monitoring Program to specify that process facility crane rails and girders, condensate storage tank (CST) enclosure, CO ₂ tank enclosure, N ₂ tank enclosure and restraining wall, CST pipe trench, diesel generator cable trench, fuel oil pump house, service water pipe trench, man-way seals and gaskets, and hatch seals and gaskets are included in the program.	March 21, 2012	BVY 06-009	B.1.27.2 Audit Item 377
21	Guidance for performing structural examinations of wood to identify loss of material, cracking, and change in material properties will be added to the Structures Monitoring Program.	March 21, 2012	BVY 06-009	B.1.27.2

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
22	Guidance for performing structural examinations of elastomers (seals and gaskets) to identify cracking and change in material properties (cracking when manually flexed) will be enhanced in the Structures Monitoring Program procedure.	March 21, 2012	BVY 06-009	B.1.27.2
23	Guidance for performing structural examinations of PVC cooling tower fill to identify cracking and change in material properties will be added to the Structures Monitoring Program procedure.	March 21, 2012	BVY 06-009	B.1.27.2
24	System walkdown guidance documents will be enhanced to perform periodic system engineer inspections of systems in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4 (a)(1) and (a)(3). Inspections shall include areas surrounding the subject systems to identify hazards to those systems. Inspections of nearby systems that could impact the subject system will include SSCs that are in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4 (a)(2).	March 21, 2012	BVY 06-009	B.1.28 Audit Items 187, 188 & 190
25	Implement the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program as described in LRA Section B.1.29.	March 21, 2012	BVY 06-009	B.1.29
26	Procedures will be enhanced to flush the John Deere Diesel Generator cooling water system and replace the coolant and coolant conditioner every three years.	March 21, 2012	BVY 06-009	B.1.30.1 Audit Items 84 & 164

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
27	<p>At least 2 years prior to entering the period of extended operation, for the locations identified in NUREG/CR-6260 for BWRs of the VY vintage, VY will refine our current fatigue analyses to include the effects of reactor water environment and verify that the cumulative usage factors (CUFs) are less than 1. This includes applying the appropriate Fen factors to valid CUFs determined in accordance with one of the following:</p> <ol style="list-style-type: none"> 1. For locations, including NUREG/CR-6260 locations, with existing fatigue analysis valid for the period of extended operation, use the existing CUF to determine the environmentally adjusted CUF. 2. More limiting VY-specific locations with a valid CUF may be added in addition to the NUREG/CR-6260 locations. 3. Representative CUF values from other plants, adjusted to or enveloping the VY plant specific external loads may be used if demonstrated applicable to VY. 4. An analysis using an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case) may be performed to determine a valid CUF. <p>During the period of extended operation, VY may also use one of the following options for fatigue management if ongoing monitoring indicates a potential for a condition outside the analysis bounds noted above:</p> <ol style="list-style-type: none"> 1) Update and/or refine the affected analyses described above. 2) Implement an inspection program that has been reviewed and approved by the NRC (e.g., periodic nondestructive examination of the affected locations at inspection intervals to be determined by a method acceptable to the NRC). 3) Repair or replace the affected locations before exceeding a CUF of 1.0. 	<p>March 21, 2012</p> <p>March 21, 2010 for performing a fatigue analysis that addresses the effects of reactor coolant environment on fatigue (in accordance with an NRC approved version of the ASME Code)</p>	BVY-06-058	<p>4.3.3</p> <p>Audit Items 29, 107 & 318</p>

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
28	Revise program procedures to indicate that the Instrument Air Program will maintain instrument air quality in accordance with ISA S7.3	March 21, 2012	BVY 06-009	B.1.16 Audit Item 47
29	VYNPS will perform one of the following: <ol style="list-style-type: none"> 1. Install core plate wedges, or, 2. Complete a plant-specific analysis to determine acceptance criteria for continued inspection of core plate hold down bolting in accordance with BWRVIP-25 and submit the inspection plan and analysis to the NRC two years prior to the period of extended operation for NRC review and approval. 	March 21, 2012	BVY 06-009	B.1.7 Audit Item 9
30	Revise System Walkdown Program to specify CO2 system inspections every 6 months.	March 21, 2012	BVY 06-009	B.1.28 Audit Items 30, 141, 146 & 298
31	Revise Fire Water System Program to specify annual fire hydrant gasket inspections and flow tests.	March 21, 2012	BVY 06-009	B.1.12.2 Audit Items 39 & 40
32	Implement the Metal Enclosed Bus Program. Details are provided in a LRA Amendment 16, Attachment 3 and LRA Amendment 23, 7.	March 21, 2012	BVY 06-058 BVY 07-003 BVY 06-091	Audit Item 97

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
33	Include within the Structures Monitoring Program provisions that will ensure an engineering evaluation is made on a periodic basis (at least once every five years) of groundwater samples to assess aggressiveness of groundwater to concrete. Samples will be monitored for sulfates, pH and chlorides.	March 21, 2012	BVY 06-009	B.1.27 Audit Item 77 RAI 3.5-7
34	Implement the Bolting Integrity Program. Details are provided in a LRA Amendment 16, Attachment 2 and LRA Amendment 23, Attachment 5.	March 21, 2012	BVY 06-058 BVY 07-003 BVY 06-091	Audit Items 198, 216, 218, 237, 331 & 333
35	Provide within the System Walkdown Training Program a process to document biennial refresher training of Engineers to demonstrate inclusion of the methodology for aging management of plant equipment as described in EPRI Aging Assessment Field Guide or comparable instructional guide.	March 21, 2012	BVY 06-058	Audit Item 384
36	If technology to inspect the hidden jet pump thermal sleeve and core spray thermal sleeve welds has not been developed and approved by the NRC at least two years prior to the period of extended operation, VYNPS will initiate plant-specific action to resolve this issue. That plant specific action may be justification that the welds do not require inspection.	March 21, 2010	BVY06-058	Audit Item 12
37	Continue inspections in accordance with the Steam Dryer Monitoring Program, Revision 3 in the event that the BWRVIP-139 is not approved prior to the period of extended operation.	March 21, 2010	BVY 06-079	Audit Item 204

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
38	The BWRVIP-116 report which was approved by the Staff will be implemented at VYNPS with the conditions documented in Sections 3 and 4 of the Staff's final SE dated March 1, 2006, for the BWRVIP-116 report.	March 21, 2012	BVY 06-088	Response to RAI B.1.24-1
39	If the VYNPS standby capsule is removed from the reactor vessel without the intent to test it, the capsule will be stored in a manner which maintains it in a condition which would permit its future use, including during the period of extended operation, if necessary.	March 21, 2012	BVY 06-088	Response to RAI B.1.24-2
40	This Commitment has been deleted and replaced with Commitment 43.	N/A	BVY 07-018	N/A
41	This Commitment has been deleted and replaced with Commitment 43.	N/A	BVY 07-018	N/A
42	Implement the Bolted Cable Connections Program. Details are provided in LRA Amendment 23, attachment 7.	March 21, 2012	BVY 07-003 BVY 07-018	Response to: RAI 3.6.2.2-N-01 LRA Sections: 3.6.2.1 A.2.1.39 B.1.33 Table 3.6.1 Table 3.6.2-1
43	Establish and implement a program that will require testing of the two 13.8 kV cables from the two Vernon Hydro Station 13.8 kV switchgear buses to the 13.8 kV / 69 kV step up transformers before the period of extended operation and at least once every 10 years after the initial test.	March 21, 2012	BVY 07-009 BVY 07-018	Am. 24 Response to: RAIs 3.6.2.2-N-08-2 3.6.2.2-N-08-4

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
44	Guidance for performing examinations of buried piping will be revised to include the following. "A focused inspection will be performed within the first 10 years of the period of extended operation, unless an opportunistic inspection (or an inspection via a method that allows an assessment of pipe condition without excavation) occurs within this ten-year period."	March 21, 2012	BVY 07-018	Regional inspection
45	Enhance the Service Water Integrity Program to require a periodic visual inspection of the RHRSW pump motor cooling coil internal surface for loss of material.	March 21, 2012	BVY 07-018	Regional inspection
46	Enhance the Diesel Fuel Monitoring Program to specify that fuel oil in the fire pump diesel storage (day) tank will be analyzed according to ASTM D975-02 and for particulates per ASTM D2276. Also, fuel oil in the John Deere diesel storage tank will be analyzed for particulates per ASTM D2276.	March 21, 2012	BVY 07-018	Regional inspection
47	Enhance the Diesel Fuel Monitoring Program to specify that fuel oil in the common portable fuel oil storage tank will be analyzed according to ASTM D975-02, per ASTM D2276 for particulates, and ASTM D1796 for water and sediment.	March 21, 2012	BVY 07-018	Regional inspection
48	Perform an internal inspection of the underground Service Water piping before entering the period of extended operation.	March 21, 2012	BVY 07-018	Regional inspection
49	Revise station procedures to specify fire hydrant hose testing, inspection, and replacement, if necessary, in accordance with NFPA code specifications for fire hydrant hoses.	March 21, 2012	BVY 07-009	Audit Item 38

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ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
50	During the period of extended operation, review the Vernon Dam owner FERC required report(s) at a minimum of every five years to confirm that the Vernon Dam owner is performing the required FERC inspections. Document deficiencies in the Entergy Corrective Actions Program and evaluate operability as described in BVY 96-043 and BVY 97-043 if it is determined that the required inspections are not being performed.	March 21, 2012	BVY 06-009 BVY 07-047	RAI 3.6.2.2.N-08-1
51	Entergy will perform an evaluation of operating experience at extended power uprate (EPU) levels prior to the period of extended operation to ensure that operating experience at EPU levels is properly addressed by the aging management programs. The evaluation will include Vermont Yankee (VY) and other BWR plants operating at EPU levels.	March 21, 2012	BVY-08-008	N/A