



Entergy

Entergy Nuclear Operations, Inc

Vermont Yankee
P.O. Box 250
Governor Hunt Road
Vernon, VT 05354
Tel 802 257 7711

April 10, 2008

BVY 08-020

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

Reference: NRC Generic Letter 2007-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," NRY 08-008, dated January 11, 2008

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Vermont Yankee Three Month Response to Generic Letter 2008-01

Dear Sir or Madam:

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 dated January 11, 2008, to address the issue of gas accumulation in emergency core cooling, decay heat removal, and containment spray systems.

The GL requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the GL to provide the following (summarized) information:

- a. A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license, as those requirements apply to the subject systems of the GL.
- b. A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that were determined necessary to assure compliance with these regulations.
- c. A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

Additionally, the NRC requested that if a licensee cannot meet the requested nine month response date, the licensee provide a response within 3 months of the date of this GL. In the three month response, the licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

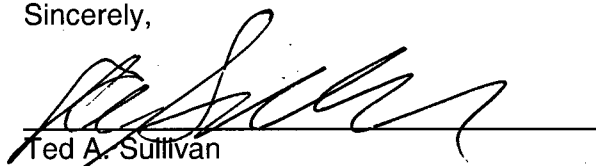
A134
NRR

Attachment 1 to this letter contains Vermont Yankee's three month response to NRC GL 2008-01. Attachment 2 contains new regulatory commitments.

If you have any questions or require additional information, please contact Mr. David Mannai at 802-451-3304.

The requested information is being provided pursuant the requirements of 10 CFR 50.54(f). I declare under the penalty of perjury that the foregoing information is true and correct. Executed on April 10, 2008.

Sincerely,



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

Attachments:

1. Vermont Yankee Three Month Response to NRC Generic Letter 2008-01.
2. Regulatory Commitment List

cc: Mr. Samuel J. Collins, Regional Administrator
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. James S. Kim, Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop O8C2A
Washington, DC 20555

USNRC Resident Inspector
Entergy Nuclear Vermont Yankee, LLC
P.O. Box 157
Vernon, Vermont 05354

Mr. David O'Brien, Commissioner
VT Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05620-2601

BVY 08-020
Docket No. 50-271

Attachment 1

Vermont Yankee Nuclear Power Station

Vermont Yankee Three Month Response to NRC Generic Letter 2008-01

Vermont Yankee Three Month Response to NRC Generic Letter 2008-01

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the three month response requested in NRC GL 2008-01, which was dated January 11, 2008.

This response discusses:

- The required evaluations that will not be complete by October 11, 2008 (nine months from the date of GL 2008-01).
- The alternative course of action planned.
- The basis for the acceptability of the alternative course of action.

For Vermont Yankee (VY), the following emergency core cooling systems and decay heat removal systems are considered within the scope of GL 2008-01:

- High Pressure Coolant Injection System
- Core Spray System
- Residual Heat Removal System (containment spray, low pressure coolant injection, and shut down cooling modes)

The information requested for the nine month response to GL 2008-01 includes a description of the results of evaluations that were performed pursuant to the requested actions of the GL, a description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that were determined necessary; the status of corrective actions, a schedule for completion of outstanding corrective actions, and the basis for that schedule. The requested evaluations are those necessary to ensure that the subject systems are sufficiently filled with water that they can reliably perform their intended functions.

The performance of an in-field inspection of the system piping is considered to be a necessary part of the VY evaluations. Since portions of the above systems are inaccessible or high dose areas during power operations, an outage is required to complete the response to the GL. VY has a refueling outage (RFO) during the Fall of 2008 and will finalize walkdowns and inspections during the RFO. Therefore, the full scope of the required evaluations and any resultant corrective actions will not be complete prior to the requested nine month GL response date.

VY will have the walkdowns and evaluations of the normally accessible portions of the above systems completed by October 11, 2008. VY will complete the walkdown of the inaccessible portions of the systems during the RFO and VY will supplement the initial response to the GL by January 30, 2009. This will provide time following the RFO to evaluate the results of the outage inspections.

BVY 08-020
Docket No. 50-271

Attachment 2

Vermont Yankee Nuclear Power Station

Regulatory Commitment List

Regulatory Commitments Table

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

Letter Number/Title: BVY 08-020, Vermont Yankee Three Month Response to Generic Letter 2008-01

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Submit an initial response to Generic Letter 2008-01.	X		October 11, 2008
Submit a supplemental response to Generic Letter 2008-01.	X		January 30, 2009