Entergy

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July 11, 2008

BVY 08-037

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

**References:**

a) Letter, VYNPC to USNRC, "Reply to a Notice of Violation – Inspection Report No. 50-271/94-04", BVY 94-34, dated March 18, 1994
b) NEI 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999

**Subject:** **Vermont Yankee Nuclear Power Station**
**License No. DPR-28 (Docket No. 50-271)**
**Update on Vermont Yankee Letter BVY 94-34 Program Commitments**
**Relative to Control Room HVAC Surveillance Testing**

In Reference (a), Vermont Yankee (VY) provided corrective actions to implement a periodic isolation test for the control room ventilation system. Periodic testing of the isolation capabilities of the control room ventilation system had not been in place prior to that time. The following summarizes a change to VY commitments made in Reference (a).

The Control Room HVAC system (CRHVAC) provides heating and cooling to the control room and also serves to isolate control room ventilation during a fire or radiological accident. In Reference (a), VY committed to a surveillance test program to demonstrate that the CRHVAC would perform its intended safety function to maintain a habitable environment for control room personnel and equipment during a postulated accident. As a result, a CRHVAC isolation surveillance test was added to the applicable plant procedure to be performed on a quarterly basis.

Recently, VY identified that the test frequency had been revised to semi-annual in 1996 and the test has been performed at that periodicity since that time. A review of five consecutive years of surveillance forms has indicated that there were no issues during the performance of the isolation test when done on a semi-annual basis. Based upon this, the change of the periodicity of the isolation test from quarterly to semi-annually has not affected system performance or reliability. It is the intention of VY to continue the CRHVAC isolation test on a semi-annual basis.

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No NRC action is requested on this issue. This letter serves to update the docket relative to this prior commitment. This change in commitment continues to provide adequate assurance of CRHVAC operability.

This commitment change was evaluated in accordance with Entergy's procedure for implementing the guidance contained in Reference (b) and determined to not impact nuclear safety.

This letter revises an existing regulatory commitment.

We trust that the information provide is adequate; however should you have any question or require additional information, please contact Mr. Dave Mannai (802) 451- 3304.

Sincerely,

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

Attachment 1 – List of Regulatory Commitments

cc: Mr. Samuel J. Collins, Regional Administrator
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Mr. James S. Kim, Project Manager
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# Attachment 1

## Vermont Yankee Nuclear Power Station

## List of Regulatory Commitments

## *List of Regulatory Commitments*

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

| COMMITMENT | TYPE (Check one) | | SCHEDULED COMPLETION DATE |
|---|---|---|---|
| | ONE-TIME ACTION | CONTINUING COMPLIANCE | |
| Perform isolation test of Control Room HVAC system on a semi-annual basis. | | X | Semi-annually |