

May 19, 2010

Mr. Michael A. Balduzzi  
Sr. Vice President & COO  
Regional Operations, NE  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

SUBJECT: PLAN FOR AUDIT OF BURIED PIPING REGARDING THE VERMONT YANKEE  
NUCLEAR POWER STATION LICENSE RENEWAL APPLICATION REVIEW  
(TAC NO. MC9668)

Dear Mr. Balduzzi:

By letter January 25, 2006, Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc. (Entergy), submitted an application for renewal of operating license DPR-28 for the Vermont Yankee Nuclear Power Station (VYNPS). In light of the recent developments related to tritium leaks found on the site and potential misinformation given to the state of Vermont by Entergy, the staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) will conduct an audit of the license renewal information related to buried piping. The staff plans to conduct this audit the week of May 24, 2010. If you have any questions, please contact me by telephone at 301-415-3733 or by e-mail at [robert.kuntz@nrc.gov](mailto:robert.kuntz@nrc.gov).

Sincerely,

*/RA/*

Robert F. Kuntz, Sr. Project Manager  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure:  
As stated

cc w/encl: See next page

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Letter To M. Balduzzi from R. Kuntz dated, May 19, 2010

Subject: PLAN FOR AUDIT OF BURIED PIPING REGARDING THE VERMONT YANKEE  
NUCLEAR POWER STATION LICENSE RENEWAL APPLICATION REVIEW (TAC  
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Vermont Yankee Nuclear Power Station

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**Audit Plan**

**Buried Piping  
for the Vermont Yankee  
Nuclear Power Station  
License Renewal Application**

**Week of May 24, 2010**

**Division of License Renewal  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission**

ENCLOSURE

## **Buried Piping Audit Plan Vermont Yankee Nuclear Power Station**

### **1. Background**

By letter January 25, 2006, Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc. (Entergy), submitted an application for renewal of operating license DPR-28 for the Vermont Yankee Nuclear Power Station (VYNPS). In December 2009, Entergy noted elevated levels of tritium in on-site monitoring wells. Subsequently, information provided by Entergy to the State of Vermont has been called into question. The U.S. Nuclear Regulatory Commission staff (NRC or staff) will conduct an on-site audit during the week of May 24, 2010, to verify the information provided in support of Entergy's request for a renewed license regarding buried, below grade, and limited access piping are accurate and complete.

### **2. Regulatory Audit Bases**

License renewal requirements are specified in Title 10 of the *Code of Federal Regulations* (CFR) Part 54 (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," and the guidance is provided in NUREG-1800, Rev. 1, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), dated September 2005, and NUREG-1801, Rev. 1, "Generic Aging Lessons Learned (GALL) Report," dated September 2005.

### **3. Regulatory Audit Scope**

The scope of this regulatory audit is all the systems that contain buried, below grade, or limited access piping within the scope of license renewal. The staff will review system drawings, procedures, interview plant personnel, and complete system walk-downs to verify that the information provided in the license renewal application related to the subject piping is accurate.

### **4. Information and Other Material Necessary for the Regulatory Audit**

The project team will review the license renewal application, request for information responses, previous audit question and answer database, system drawings, procedures, and information provided to the State of Vermont.

### **5. Team Assignments**

<b>Area of Review</b>	<b>Assigned Auditor</b>
Management Supervision	David Pelton
Mechanical	William Holston
System Scoping	Greg Casto
Regional Support	Tom Burns
Material and Environment Review	Donald Brittner



**6. Logistics**

The audit will be conducted at VYNPS from May 25 until May 27, 2010. Entrance and exit briefings will be held at the beginning and end of this audit, respectively.

**7. Special Requests**

The staff requests the applicant to make available all system drawings, and plant personnel who have responsibility for the systems within the scope of license renewal that contain buried or underground piping.

**8. Deliverables**

An audit report should be issued to the applicant within 90 days from the end of the audit.