

Entergy Nuclear Operations, Inc.

Vermont Yankee P.O. Box 0250 320 Governor Hunt Road Vernon, VT 05354 Tel 802 257 7711

> James M. DeVincentis Licensing Manager

BVY 10-020

March 30, 2010

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

Subject:

2009 Financial Test for VY Decommissioning Fund Parent Guarantee

Vermont Yankee Nuclear Power Station

Docket No. 50-271 License No. DPR-28

References:

(1) Letter, NRC to VYNPS, "Decommissioning Funding Status Report for Vermont Yankee Nuclear Power Station (TAC No. ME0583)," dated December 8, 2009

(2) Letter, VYNPS to NRC, "Decommissioning Funding Assurance Documentation," BVY 10-008, dated January 28, 2010

Dear Sir or Madam:

Reference (1) provides NRC acceptance of a Parent Guarantee, in combination with the Decommissioning Trust Fund, for providing the required financial assurance for eventual decommissioning of the facility. On January 7, 2010 that NRC requested certain Parent Guarantee verifying documentation be provided, which was submitted as Reference (2).

Section 8 of the Parent Guarantee requires the guarantor to submit certain financial documents to the NRC annually within 90 days of the close of the parent guarantor's fiscal year (December 31, 2009). Reference (2) provided 2008 fiscal year documentation. The enclosures to this letter provide 2009 fiscal year documentation.

This letter contains no new Regulatory Commitments.

Should you have any questions concerning this submittal or require additional information, please contact me at (802) 451-3150.

Sincerely,

[JMD/JTM]

ADDI

Attachments:

- 1. Entergy Corporation Parent-Guarantee of Funds for Decommissioning: Letter from Chief Financial Officer to Demonstrate Financial Assurance (3 pages)
- 2. Independent Accountants Report on Applying Agreed Upon Procedures (4 pages)

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

Mr. James S. Kim, Project Manager U.S. Nuclear Regulatory Commission Mail Stop O 8 C2A Washington, DC 20555

USNRC Resident Inspector Entergy Nuclear Vermont Yankee 320 Governor Hunt Road Vernon, Vermont 05354

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

Attachment 1

Vermont Yankee Nuclear Power Station

Entergy Corporation Parent-Guarantee of Funds for Decommissioning: Letter from Chief Financial Officer to Demonstrate Financial Assurance

(3 pages)



ENTERGY CORPORATION P.O. Box 61000 New Orleans, LA 70161 (504) 576-6106

LEO P. DENAULT EXECUTIVE VICE PRESIDENT AND CHIEF FINANCIAL OFFICER

Appendix A

March 17, 2010

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

Subject:

Entergy Corporation Parent – Guarantee of Funds for Decommissioning: Letter from Chief Financial Officer to Demonstrate Financial Assurance

I am the chief financial officer of Entergy Corporation, 639 Loyola Avenue, New Orleans, LA 70113, a corporation. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in 10 CFR Part 50.

This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 50, the decommissioning of the following facility owned or operated by a subsidiary of this firm. The current cost estimate or certified amount for decommissioning, and the amount being guaranteed, are shown for the facility:

Name of Facility	Location of Facility	Current Cost Estimate	Amount Being Guaranteed
Vermont Yankee	Vernon, VT	\$518,914,329	\$40,000,000
Nuclear Power Station		**************************************	
License No. DPR-28			

Entergy Corporation is required to file a Form 10K with the U.S. Securities and Exchange Commission for the latest fiscal year.

This fiscal year of Entergy Corporation ends on December 31st. The figures for the following items (Financial Test II) marked with an asterisk are derived from this Entergy Corporation's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended December 31, 2009.

Thereby certify that the content of this letter is true and correct to the best of my knowledge.

Leo P. Denault

Executive Vice President and Chief Financial Officer

3/17/10

Date

FINANCIAL TEST: ALTERNATIVE II (10 CFR Part 30 App. A. Section II A.2.)

Entergy Corporation Parent Guarantee of Funds For Decommissioning Dollars in thousands

1.	Guaranteed amount for Vermont Yankee Nuclear Power Station, License No. DPR-28 (total cost of all cost estimates should be stated in paragraphs above)	\$40,000	
2.	Current bond or credit rating of most recent unsecured issuance of this firm (see NOTE/ below)		
	Rating BBB corporate credit rating as of January 29, 2010		
	Name of rating service Standard & Poor's		
3.	Date of issuance of bond (See NOTE/ below)		
4.	Date of maturity of bond (See NOTE/ below)		
*5.	Tangible net worth** (if any portion of estimates for decommissioning is included in total liabilities on your firm's financial statements, you may add the amount of that portion to this line)	\$8,547,531	
*6.	Total assets in United States (required only if less than 90 percent of firm's assets are located in the United States)		
		Yes	<u>No</u>
7. Is	line 5 at least \$10,000?	X	
8. Is	line 5 at least 6 times line 1?	Χ .	
	e at least 90 percent of firm's assets located the United States? If not, complete line 10.	X	*
10. Is	s line 6 at least 6 times line 1?	N/A	
b	s the rating specified on line 2 "BBB" or better (if issued y Standard & Poor's) or "Baa" or better (if issued by	÷	
N	Moody's)?	X	

NOTE/ Entergy Corporation does not have any recent bond issuances. Notes were issued in 2002 and 2003, but these were issued via private placement and were not rated. Ratings supplied above are the current credit ratings from the indicated rating agency.

^{*} Denotes figures derived from financial statements.

^{**} Tangible net worth is defined as net worth minus goodwill, patents, trademarks, and copyrights.

RECONCILING SCHEDULE ENTERGY CORPORATION YEAR ENDED DECEMBER 31, 2009 Dollars in thousands

Line Number in CFO's Letter	Per Financial <u>Statements</u>	Recon- ciling <u>Items</u>	Per CFO's <u>Letter</u>
Total Assets	\$37,364,597		
Less: Total Current Liabilities	(3,193,997)		· .
Less: Total Non-Current Liabilities	(25,245,897)		· ·
Less: Goodwill	(377,172)		
Tangible Net Worth	\$8,547,531	٠.	\$8,547,531

Attachment 2

Vermont Yankee Nuclear Power Station Independent Accountants Report on Applying Agreed Upon Procedures

(4 pages)

Deloitte.

Deloitte & Touche LLP Suite 4200 701 Poydras Street New Orleans, LA 70139-4200 USA

Tel: +1 504 581 2727 Fax: +1 504 561 7293 www.deloitte.com

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors Entergy Corporation New Orleans, Louisiana

We have performed the procedures enumerated below, which were agreed to by Entergy Corporation (the "Company"), solely to assist the Company in connection with the Company's and the U.S. Nuclear Regulatory Commission's ("NRC") evaluation of the Company's compliance with the requirements specified in Appendix A, Section II A.2 to Part 30 of 10 CFR, the Financial Test: Alternative II (the "Financial Test") as of December 31, 2009, included in the accompanying letter from the Chief Financial Officer of the Company dated March 17, 2010 to the NRC. The Company's management is responsible for compliance with those requirements. This agreedupon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, as adopted by the Public Company Accounting Oversight Board (United States). The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

It should be understood that (1) we make no representations regarding the Company's determination and presentation of non-GAAP measures (such as tangible net worth), and (2) the non-GAAP measure presented may not be comparable to similarly titled measures reported by other companies. However, the following procedures were applied to the attached Schedules on pages 2 and 3 of Appendix A as indicated with respect to the symbols explained below.

- A. We compared these amounts to the Company's audited financial statements for the year ended December 31, 2009 and found such amounts to be in agreement.
- B. We compared the "Tangible Net Worth" amount as shown in the column "Per CFO's Letter" included in the Reconciling Schedule on page 3 of Appendix A to the "Tangible net worth" amount presented on line 5 of the Financial Test: Alternative II Schedule on page 2 of Appendix A and found such amounts to be in agreement.
- C. We proved the arithmetic accuracy of the statement and noted no exception.

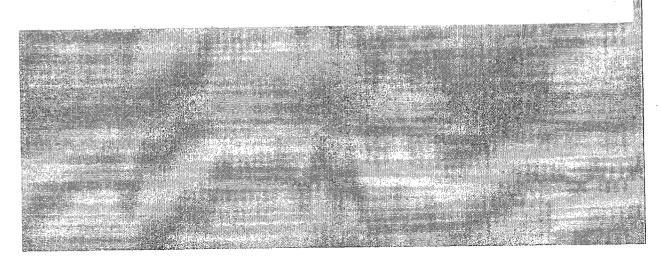
We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the board of directors and management of the Company and the NRC, and is not intended to be and should not be used by anyone other than these specified parties.

Deloite & Touche UP

March 26, 2010

Member of Deloitte Touche Tohmatsu





ENTERGY CORPORATION P.O. Box 61000 New Orleans, LA 70161 (504) 576-6106

LEO.P. DENAULT EXECUTIVE VICE PRESIDENT AND CHIEF FINANCIAL OFFICER

Appendix A

March 17, 2010

License No. DPR-28

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

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This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 50, the decommissioning of the following facility owned or operated by a subsidiary of this firm. The current cost estimate or certified amount for decommissioning, and the amount being guaranteed, are shown for the facility:

Name of Facility	Location of Facility	Current Cost Estimate	Amount Being Guaranteed
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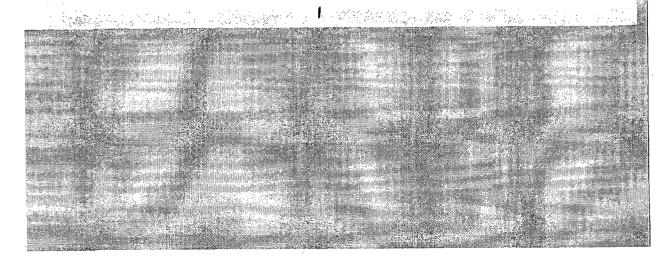
This fiscal year of Entergy Corporation ends on December 31st. The figures for the following items (Financial Test II) marked with an asterisk are derived from this Entergy Corporation's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended December 31, 2009.

I hereby certify that the content of this letter is true and correct to the best of my knowledge.

Leo P. Denault

Executive Vice President and Chief Financial Officer

Date



FINANCIAL TEST: ALTERNATIVE II (10 CFR Part 30 App. A. Section II A.2.) Entergy Corporation Parent Guarantee of Funds For Decommissioning Dollars in thousands

 Guaranteed amount for Vermont Yankee Nuclear Power Station, License No. DPR-28 (total cost of all cost estimates should be stated in paragraphs above)

\$40,000

2. Current bond or credit rating of most recent unsecured issuance of this firm (see NOTE/ below)

Rating BBB corporate credit rating as of January 29, 2010

Name of rating service Standard & Poor's

- 3. Date of issuance of bond (See NOTE/ below)
- 4. Date of maturity of bond (See NOTE/ below)
- *5. Tangible net worth** (if any portion of estimates for decommissioning is included in total liabilities on your firm's financial statements, you may add the amount of that portion to this line)

\$8,547,531 %

*6. Total assets in United States (required only if less than 90 percent of firm's assets are located in the United States)

by Standard & Poor's) or "Baa" or better (if issued by

7. Is line 5 at least \$10,000?

8. Is line 5 at least 6 times line 1?

9. Are at least 90 percent of firm's assets located in the United States? If not, complete line 10.

10. Is line 6 at least 6 times line 1?

N/A

Moody's)? X

NOTE/ Entergy Corporation does not have any recent bond issuances. Notes were issued in 2002 and 2003, but these were issued via private placement and were not rated. Ratings supplied above are the current credit ratings from the indicated rating agency.

^{*} Denotes figures derived from financial statements.

^{**} Tangible net worth is defined as net worth minus goodwill, patents, trademarks, and copyrights.

RECONCILING SCHEDULE ENTERGY CORPORATION YEAR ENDED DECEMBER 31, 2009 Dollars in thousands

	Per	Recon-	Per
Line Number in	Financial	ciling	CFO's
CFO's Letter	Statements	<u>ltems</u>	<u>Letter</u>

Total Assets \$37,364,597 A

Less: Total Current Liabilities (3,193,997) A

Less: Total Non-Current Liabilities (25,245,897) A

Less: Goodwill (377,172) A

Tangible Net Worth \$8,547,531 \$ \$8,547,531 \$

