



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 25, 2010

Mr. Michael Mulligan
P.O. Box 161
Hinsdale, NH 03451

Mr. Raymond Shadis
Consultant to New England Coalition
P.O. Box 98
Edgecomb, ME 04556

Mr. Thomas Saporito, Executive Director
RenewableElectricSystems.com
P.O. Box 8413
Jupiter, FL 33468

Dear Messrs. Mulligan, Shadis, and Saporito:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letters dated January 12, 2010, from Mr. Michael Mulligan, February 8, 2010, from Mr. Raymond Shadis, and February 20, 2010, from Mr. Thomas Saporito about tritium leaks at the Vermont Yankee Nuclear Power Station. Your letters are available from the NRC's Agencywide Documents Access and Management System (ADAMS) in the public Electronic Reading Room on the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> under ADAMS Accession Nos. ML100190688, ML100470430, and ML100621374. In accordance with Management Directive (MD) 8.11, "Review Process for 10 CFR 2.206 Petitions," the NRC has processed your letters as a consolidated petition for enforcement action under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.206, "Requests for Action under This Subpart," and assigned this consolidated petition to the NRC's Office of Nuclear Reactor Regulation.

Mr. Mulligan requested in his petition that (1) the radioactive leak into the environment of Vermont Yankee (VY) be immediately stopped and VY be immediately shutdown and all leaking paths be isolated and (2) VY disclose its preliminary "root cause analysis" and the NRC release its preliminary investigative report on this analysis before plant startup.

On January 20, 2010, Mr. Mulligan asked to address the Petition Review Board (PRB) before its initial meeting to provide supplemental information for the Board's consideration. By teleconference on January 25, 2010, Mr. Mulligan provided information to the PRB as further explanation and support for the petition. A copy of the transcript is available in ADAMS under Accession No. ML100330603.

The PRB met on February 1, 2010, to discuss Mr. Mulligan's petition and denied the request for immediate action to shutdown VY because the PRB did not identify any urgent safety concerns that would warrant an immediate shutdown.

Subsequently, Mr. Mulligan was informed of the PRB's decision on the immediate action, and on February 18, 2010, Mr. Mulligan requested another opportunity to address the PRB to

provide relevant additional information to support the petition. By teleconference on February 23, 2010, Mr. Mulligan provided additional information to the PRB. A copy of the transcript is available in ADAMS under Accession No. ML100630404.

Mr. Shadis requested in his petition that the NRC (1) require VY to go into cold shutdown and depressurize all systems in order to slow or stop the leak, (2) act promptly to stop or mitigate the leak(s) and not wait until all issues raised by the New England Coalition are resolved, (3) require VY to reestablish its licensing basis by physically tracing records and reporting physical details of all plant systems that would be within scope as "Buried Pipes and Tanks" in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," and under the requirements of 10 CFR 50.54, "Conditions of Licenses," (4) investigate and determine why Entergy has been allowed to operate VY since 2002 without a working knowledge of all plant systems and why the NRC's Reactor Oversight Process (ROP) and review process for license renewal amendment did not detect this dereliction, (5) take notice of Entergy Nuclear Vermont Yankee's many maintenance and management failures (from 2000-2010) and the ROP's failure to detect them early and undertake a full diagnostic evaluation team inspection or NRC Inspection Procedure 95003, "Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs or One Red Input," and (6) require Entergy VY to apply for an amendment to its license renewal that would address both aging analysis and aging management of all buried piping carrying or with the potential to carry radionuclides and/or the potential to interact with any safety or safety-related system.

The PRB met on February 17, 2010, and denied the request for immediate action to implement a cold shutdown and depressurize all systems in order to slow or stop the leak because the PRB did not identify any urgent safety concerns that would warrant an immediate shutdown.

On February 19, 2010, Mr. Shadis was informed of the PRB's decision on the immediate action, and Mr. Shadis requested an opportunity to address the PRB before its initial meeting to provide supplemental information for the Board's consideration. By teleconference on March 3, 2010, Mr. Shadis provided information to the PRB as further explanation and support for the petition. A copy of the transcript is available in ADAMS under Accession No. ML100680299.

Mr. Saporito requested in his petition that the NRC (1) order a "cold-shut-down" mode of operation for VY because of leaking radioactive tritium and (2) issue a Confirmatory Order modifying the NRC-issued license for VY so that the licensee must bring the nuclear reactor to a "cold-shut-down" mode of operation until the licensee can provide definitive reasonable assurance to the NRC, under affirmation, that the reactor will be operated in full compliance with the regulations in 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," and Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, Criterion 60, "Control of Releases of Radioactive Materials to the Environment," and Criterion 64, "Monitoring Radioactivity Releases," and other NRC regulations and authority.

The PRB met on February 25, 2010, to discuss Mr. Saporito's petition and denied the request for immediate action to bring VY to a "cold-shut-down" mode of operation because the PRB did not identify any urgent safety concerns that would warrant an immediate shutdown.

The Board on February 25, 2010, denied the request for immediate action to bring VY to a "cold-shut-down" mode of operation because the PRB did not identify any urgent safety concerns that would warrant an immediate shutdown.

March 8, 2010, Mr. Saporito provided information to the PRB as further explanation and support for the petition. A copy of the transcript is available in ADAMS under Accession No. ML100770408.

The PRB met on March 25 and April 22, 2010, and considered these 10 CFR 2.206 petitions (as consolidated) and made an initial recommendation to accept the consolidated petition for review, in part, for the following specific issues and concerns identified in the petitions and/or supplemented during the teleconferences:

- (1) Increasing concentrations of radiocontaminants in the soil and groundwater at VY, as well as an increasing area of contamination, are manifest on a daily basis. VY risks aggravating the contamination by continuing to run the reactor at full power while attempting over a period of a month to triangulate the location of a presumed leak by drilling a series of test wells in the affected area.
- (2) During the license renewal application proceeding, the licensee has averred that it was unaware of the existence of some buried pipes, now uncovered, and it has yet to discover their path and purpose.
- (3) Entergy has, in 8 years of ownership, failed to learn and understand VY's design, layout, and construction. This failure to comprehend and understand the layout, function, and potentially the interaction of the plant's own piping systems constitutes a loss of design basis.
- (4) The NRC's ROP has apparently failed to capture, anticipate, and prevent ongoing maintenance, engineering, quality assurance, and operation issues that have manifested themselves in a series of high-profile incidents since Entergy took over VY. The agency has repeatedly failed to detect root cause trends until they have, as in this instance, become grossly self-revealing.
- (5) The NRC should ensure that Entergy has adequate decommissioning funds. The tritium leak will increase decommissioning costs because of the need for site radiological examination and soil remediation.

In addition, each petitioner stated that the tritium leak is just one example of many maintenance and management failures at VY. All three raised a concern regarding what they perceive as the NRC's failure to examine the deficiencies at VY in an integrated manner. Although the individual petition was written to request enforcement action specifically because of the tritium leak, during each of the transcribed phone calls, each petitioner urged the NRC to take a broader view and assess operational and performance failures at VY collectively, instead of individually. This concern has met the criteria for review in accordance with MD 8.11.

On April 26, 2010, the petitioners were informed of the PRB's initial recommendations to accept, in part, the petitions for review. Both Mr. Shadis and Mr. Saporito requested an opportunity to address the PRB to provide additional explanation or support for the petition after the PRB's initial consideration and recommendation. By teleconference on May 5, 2010, both Mr. Shadis and Mr. Saporito provided additional information to the PRB to explain and support the petition. A copy of the transcript is available in ADAMS under Accession No. ML101320121.

On May 10, 2010, the PRB reconvened to evaluate the consolidated petition, including the additional information provided in the teleconference on May 5, 2010, to determine whether any other issues should be reviewed as part of the 10 CFR 2.206 process. The PRB confirmed its initial recommendation to accept the consolidated petition, in part, because the petitioners did not provide any relevant or new information that would result in a change to the initial recommendation.

As required by 10 CFR 2.206, the NRC will act on your petition within a reasonable time. Mr. James Kim, assigned as the manager for this consolidated petition, can be reached at 301-415-4125. I have enclosed for your information a copy of the notice that the NRC is filing with the Office of the Federal Register for publication. I have also enclosed for your information a copy of the brochure NUREG/BR-0200, Revision 5, "Public Petition Process," dated February 1, 2003, prepared by the NRC's Office of Public Affairs.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric J. Leeds". The signature is fluid and cursive, with the first name "Eric" and last name "Leeds" clearly distinguishable.

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures:

1. *Federal Register* Notice
2. NUREG/BR-0200

cc: Listserv

U.S. NUCLEAR REGULATORY COMMISSION
ENTERGY NUCLEAR OPERATIONS, INC.
ENTERGY NUCLEAR VERMONT YANKEE, LLC
VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

LICENSE NO. DPR-28

RECEIPT OF REQUEST FOR ACTION UNDER 10 CFR 2.206

Notice is hereby given that by petitions dated January 12, 2010, from Mr. Michael Mulligan, February 8, 2010, from Mr. Raymond Shadis, and February 20, 2010, from Mr. Thomas Saporito have requested that pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.206, "Requests for Action under this Subpart," the U.S. Nuclear Regulatory Commission (NRC) take action with regard to the Vermont Yankee Nuclear Power Station.

Mr. Mulligan requested in his petition that (1) the radioactive leak into the environment of Vermont Yankee (VY) be immediately stopped and VY be immediately shutdown and all leaking paths be isolated and (2) VY disclose its preliminary "root cause analysis" and the NRC release its preliminary investigative report on this analysis before plant startup.

Mr. Shadis requested in his petition that the NRC (1) require VY to go into cold shutdown and depressurize all systems in order to slow or stop the leak, (2) act promptly to stop or mitigate the leak(s) and not wait until all issues raised by the New England Coalition are resolved, (3) require VY to reestablish its licensing basis by physically tracing records and reporting physical details of all plant systems that would be within scope as "Buried Pipes and Tanks" in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," and under the

requirements of 10 CFR 50.54, "Conditions of Licenses," (4) investigate and determine why Entergy has been allowed to operate VY since 2002 without a working knowledge of all plant systems and why the NRC's Reactor Oversight Process (ROP) and review process for license renewal amendment did not detect this dereliction, (5) take notice of Entergy Nuclear Vermont Yankee's many maintenance and management failures (from 2000–2010) and the ROP's failure to detect them early and undertake a full diagnostic evaluation team inspection or NRC Inspection Procedure 95003, "Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs or One Red Input," and (6) require Entergy VY to apply for an amendment to its license renewal that would address both aging analysis and aging management of all buried piping carrying or with the potential to carry radionuclides and/or the potential to interact with any safety or safety-related system.

Mr. Saporito requested in his petition that the NRC (1) order a "cold-shut-down" mode of operation for VY because of leaking radioactive tritium and (2) issue a confirmatory order modifying the NRC-issued license for VY so that the licensee must bring the nuclear reactor to a "cold-shut-down" mode of operation until the licensee can provide definitive reasonable assurance to the NRC, under affirmation, that the reactor will be operated in full compliance with the regulations in 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," and Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, Criterion 60, "Control of Releases of Radioactive Materials to the Environment," and Criterion 64, "Monitoring Radioactivity Releases," and other NRC regulations and authority.

The requests are being treated pursuant to 10 CFR 2.206 of the Commission's regulations. The requests have been referred to the Director of the Office of Nuclear Reactor Regulation. As provided by 10 CFR 2.206, appropriate action will be taken on this consolidated petition within a reasonable time.

Each petitioner stated that the tritium leak is just one example of many maintenance and management failures at VY. All three raised a concern regarding what they perceive as the NRC's failure to examine the deficiencies at VY in an integrated manner. Although the individual petition was written to request enforcement action specifically because of the tritium leak, during each of the transcribed phone calls, each petitioner urged the NRC to take a broader view and assess operational and performance failures at VY collectively, instead of individually. This concern has met the criteria for review in accordance with Management Directive (MD) 8.11 "Review Process for 10 CFR 2.206 Petitions."

Subsequently, the PRB made a recommendation to accept the consolidated petition for review for the following specific issues and concerns identified in the petitions and/or supplemented during the teleconferences:

- (1) Increasing concentrations of radiocontaminants in the soil and groundwater at VY, as well as an increasing area of contamination, are manifest on a daily basis. VY risks aggravating the contamination by continuing to run the reactor at full power while attempting over a period of a month to triangulate the location of a presumed leak by drilling a series of test wells in the affected area.
- (2) During the license renewal application proceeding, the licensee has averred that it was unaware of the existence of some buried pipes, now uncovered, and it has yet to discover their path and purpose.
- (3) Entergy has, in 8 years of ownership, failed to learn and understand VY's design, layout, and construction. This failure to comprehend and understand the layout, function, and potentially the interaction of the plant's own piping systems constitutes a loss of design basis.

- (4) The NRC's ROP has apparently failed to capture, anticipate, and prevent ongoing maintenance, engineering, quality assurance, and operation issues that have manifested themselves in a series of high-profile incidents since Entergy took over VY. The agency has repeatedly failed to detect root cause trends until they have, as in this instance, become grossly self-revealing.
- (5) The NRC should ensure that Entergy has adequate decommissioning funds. The tritium leak will increase decommissioning costs because of the need for site radiological examination and soil remediation.

Copies of the petitions are available to the public from the NRC's Agencywide Documents Access and Management System (ADAMS) in the public Electronic Reading Room on the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> under ADAMS Accession Nos. ML100190688, ML100470430, and ML100621374, and are available for inspection at the Commission's Public Document Room, located at One White Flint North, 11555 Rockville Pike (first floor), Rockville, Maryland.

Dated at Rockville, Maryland this 25th day of June 2010.

FOR THE NUCLEAR REGULATORY COMMISSION



Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Enclosure 2

NUREG/BR-0200

Public Petition Process

ADAMS Accession No. ML050900248

U.S. NUCLEAR REGULATORY COMMISSION



PUBLIC PETITION PROCESS

10 CFR 2.206



Introduction

The U.S. Nuclear Regulatory Commission (NRC) was established in 1975 to protect public health and safety in the civilian use of nuclear power and materials in the United States. As part of its responsibilities, NRC assesses all potential health and safety issues related to licensed activities and encourages members of the public to bring safety issues to its attention.

Section 2.206 of Title 10 of the *Code of Federal Regulations* (10 CFR 2.206) describes the petition process—the primary mechanism for the public to request enforcement action by NRC in a public process.* This process permits anyone to petition NRC to take enforcement action related to NRC licensees or licensed activities. Depending on the results of its evaluation, NRC could modify, suspend, or revoke an NRC-issued license or take any other appropriate enforcement action to resolve a problem. Requests that raise health and safety issues without requesting enforcement action are reviewed by means other than the 2.206 process.

In its effort to improve public confidence, the NRC periodically reassesses the 2.206 petition process to enhance its effectiveness, timeliness and credibility. As part of these reassessments, the NRC seeks feedback from petitioners and other stakeholders through public meetings and workshops, surveys and *Federal Register* notices, as well as from its own staff experience. Specific improvements to the 2.206 process resulting from these initiatives include:

- Offering petitioners two opportunities to discuss the petition with the NRC's petition review board (PRB). The first is to allow the petitioner to provide elaboration and clarification of the petition

*The NRC also has an allegation process in which individuals who raise potential safety concerns for NRC review are afforded a degree of protection of their identity. Other processes for public involvement are listed at the end of this pamphlet.

before the PRB meets to discuss the petition. The second opportunity comes after the PRB has discussed the merits of the petition and allows the petitioner to comment on the PRB's recommendations regarding acceptance of the petition and any requests for immediate action.

- Offering an opportunity for a staff-petitioner-licensee meeting to discuss the details of the issue during the course of the review.
- Providing better, more frequent communications between the staff and petitioner throughout the process.
- Providing copies of all pertinent petition-related correspondence and other documents to the petitioners.
- Providing a copy of the proposed director's decision on the petition, both to the petitioner and the affected licensee for comments, and considering such comments before issuing the decision in final form.

The Petition Process

The 2.206 process provides a simple, effective mechanism for anyone to request enforcement action and obtain NRC's prompt, thorough, and objective evaluation of underlying safety issues. It is separate and distinct from the processes for rulemaking and licensing, although they too allow the public to raise safety concerns to NRC.

Under the 2.206 process, the petitioner submits a request in writing to NRC's Executive Director for Operations, identifying the affected licensee or licensed activity, the requested enforcement action to be taken, and the facts the petitioner believes provide sufficient grounds for NRC to take enforcement action. Unsupported assertions of "safety problems," general opposition to nuclear power, or identification of safety issues without seeking enforcement action are not considered sufficient grounds for consideration as a 2.206 petition.

After receiving a request, NRC determines whether the request qualifies as a 2.206 petition. If the request is accepted for review as a 2.206 petition, the NRC sends an acknowledgment letter to the petitioner and a copy to the appropriate licensee and publishes a notice in the *Federal Register*. If the request is not accepted, NRC notifies the petitioner of its decision and indicates that the petitioner's underlying safety concerns will be considered outside the 2.206 process.

On the basis of an evaluation of the petition, the appropriate office director issues a decision and, if warranted, NRC takes appropriate enforcement action. Throughout the evaluation process, NRC sends copies of all pertinent correspondence to the petitioner and the affected licensee. NRC places all related correspondence in its Public Document Room (PDR) in Rockville, Maryland, and in the agency document control system. However, the agency withholds information that would compromise an investigation or ongoing enforcement action relating to issues in the petition. The NRC also sends the petitioner other information such as pertinent generic letters and bulletins.

The NRC notifies the petitioner of the petition's status every 60 days, or more frequently if a significant action occurs. Monthly updates on all pending 2.206 petitions are available on NRC's web site at <http://www.nrc.gov/reading-rm/doc-collections/petitions-2-206/index.html>, and in the PDR.

Petition Technical Review Meeting

A petition technical review meeting serves not only as a source of potentially valuable information for NRC to evaluate a 2.206 petition, but also affords the petitioner substantive involvement in the review and decision-making process through direct discussions with NRC and the licensee. Such a meeting will be held whenever the staff believes that it would be beneficial to the review of the petition. Note that the meeting can be offered at any time during NRC's review of a petition and is open to public observation.

Director's Decision

The NRC's official response to a 2.206 petition is a written decision by the director of the appropriate office that addresses the concerns raised in the petition. The agency's goal is to issue a proposed decision for comment within 120 days from the date of the acknowledgment letter. However, additional time may be needed to conduct an investigation, complete an inspection, or analyze particularly complex technical issues. If the goal is not met, the NRC staff will promptly inform the petitioner of a schedule change.

The director's decision includes the professional staff's evaluation of all pertinent information from the petition, correspondence with the petitioner and the licensee, information from any meeting, results of any investigation or inspection, and any other documents related to petition issues. Following resolution of any comments received on the proposed decision, the director's decision is provided to the petitioner and the licensee, and is posted to NRC's web site and made available in the PDR. A notice of availability is published in the *Federal Register*.

Director's decisions may be issued as follows:

- A decision granting a petition, in full, explains the basis for the decision and grants the action requested in the petition (e.g., NRC issuing an order to modify, suspend, or revoke a license).
- A decision denying a petition, in full, provides the reason for the denial and discusses all matters raised in the petition.
- A decision granting a petition, in part, in cases where the NRC decides not to grant the action requested, but takes other appropriate enforcement action or directs the licensee to take certain actions that address the identified safety concerns.
- A partial director's decision may be issued by the NRC in cases where some of the issues associated with the petition can be completed promptly but significant schedule delays are anticipated before

resolution of the entire petition. A final director's decision is issued at the conclusion of the effort.

The Commission will not entertain requests for review of a director's decision. However, on its own, it may review a decision within 25 calendar days.

NRC Management Directive 8.11, "Review Process for 10 CFR 2.206 Petitions," contains more detailed information on citizen petitions. For a free copy of the directive, write to the Superintendent of Documents, U.S. Government Printing Office, P.O. Box 37082, Washington, DC 20013-7082, or call 202-512-1800.

Electronic Access

Those parts of the monthly status report on 2.206 petitions that are not of a sensitive nature, as well as recently issued director's decisions, and Management Directive 8.11, are placed on the NRC's web site at <http://www.nrc.gov/reading-rm/doc-collections/petitions-2-206/index.html> and in the agency's Public Document Room.

Other Processes for Public Involvement

In addition to the 2.206 petition process, NRC has several other ways that permit the public to express concerns on matters related to the NRC's regulatory activities.

- The NRC's *allegation process* affords individuals who raise safety concerns a degree of protection of their identity.
- Under the provisions of 10 CFR 2.802, NRC provides an opportunity for the public to petition the agency for a *rulemaking*.
- The NRC's *licensing process* offers members of the public, who are specifically affected by a licensing action, an opportunity to formally participate in licensing proceedings. This process

applies not only to the initial licensing actions but also to license amendments and other activities such as decommissioning and license renewals.

- For major regulatory actions involving preparation of environmental impact statements, NRC offers separate opportunities for public participation in its *environmental proceedings*.
- The public can attend a number of *meetings* including open Commission and staff meetings, periodic media briefings by Regional Administrators, and special meetings held near affected facilities to inform local communities and respond to their questions.

More information on these activities can be found in NRC's pamphlet entitled, "Public Involvement in the Nuclear Regulatory Process," NUREG/BR-0215.

Office of Public Affairs
U. S. Nuclear Regulatory
Commission
Washington, DC 20555-0001
Telephone 301-415-8200 or
1-800-368-5642

NUREG/BR-0200, Rev. 5
February 2003

M. Mulligan, R. Shadis, and T. Saporito - 4 -

On May 10, 2010, the PRB reconvened to evaluate the consolidated petition, including the additional information provided in the teleconference on May 5, 2010, to determine whether any other issues should be reviewed as part of the 10 CFR 2.206 process. The PRB confirmed its initial recommendation to accept the consolidated petition, in part, because the petitioners did not provide any relevant or new information that would result in a change to the initial recommendation.

As required by 10 CFR 2.206, the NRC will act on your petition within a reasonable time. Mr. James Kim, assigned as the manager for this consolidated petition, can be reached at 301-415-4125. I have enclosed for your information a copy of the notice that the NRC is filing with the Office of the Federal Register for publication. I have also enclosed for your information a copy of the brochure NUREG/BR-0200, Revision 5, "Public Petition Process," dated February 1, 2003, prepared by the NRC's Office of Public Affairs.

Sincerely,

/RA/

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures:

- 1. *Federal Register* Notice
- 2. NUREG/BR-0200

cc: Listserv

DISTRIBUTION: G20100027/EDATS: OEDO-2010-0022
 G20100074/EDATS: OEDO-2010-0087
 G20100098/EDATS: OEDO-2010-0145

See next page

ADAMS Accession Nos:

Package: ML101440488; Incomings: ML100190688, ML100470430, and ML100621347
 Letter: ML101450004; Federal Register Notice: ML101450007
 NUREG/BR-0200: ML050900248

*Via email

| | | | | | | | | |
|--------|-----------|-----------|-----------------|----------|-----------|---------|---------|---------|
| OFFICE | LPL1-1/PM | LPL1-1/LA | Tech Editor | R1/BC* | LPL1-1/BC | DPR/DD | DORL/D | NRR/OD |
| NAME | JKim | SLittle | KAzariah-Kribbs | DJackson | NSalgado | TBlount | JGitter | ELeeds |
| DATE | 6/3/10 | 6/3/10 | 6/1/10 | 6/3/10 | 6/8/10 | 6/14/10 | 6/15/10 | 6/25/10 |

OFFICIAL RECORD COPY

Letter to Michael Mulligan, Raymond Shadis and Thomas Saporito dated June 25, 2010

SUBJECT: 2.206 PETITION FOR VERMONT YANKEE

DISTRIBUTION: G20100027/EDATS: OEDO-2010-0022
G20100074/EDATS: OEDO-2010-0087
G20100098/EDATS: OEDO-2010-0145

PUBLIC

LPL1-1 R/F

RidsNrrDorl

RidsNrrDorlLpl1-1

RidsNrrDpr

RidsNrrPMVermontYankee

RidsNrrLASLittle

TBlount

TMensah

RidsAcrsAcnwMailCenter

RidsNrrMailCenter

RidsOgcRp

RidsOgcMailCenter

RidsEdoMailCenter

RidsOpaMail

RidsRgn1MailCenter

RidsNrrOd

RidsOeMailCenter

RidsOcaMailCenter

RidsOIGMailCenter