



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

June 17, 2010

EA-10-034

Mr. Michael Colomb
Site Vice President
Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
Vernon, VT 05354

**SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION – NRC INSPECTION AND
REVIEW OF AREAS IDENTIFIED IN DEMAND FOR INFORMATION
(INSPECTION REPORT 05000271/2010007)**

Dear Mr. Colomb:

On June 11, 2010, the U.S. Nuclear Regulatory Commission (NRC or Commission) completed inspections and reviews of the areas identified in the NRC Demand for Information (DFI) (ML100570237),¹ dated March 1, 2010, at the Vermont Yankee Nuclear Power Station (Vermont Yankee). The enclosed inspection report documents the inspection and review results, which were discussed with Mr. John F. McCann, Vice President, Nuclear Safety, Emergency Planning, and Licensing, and other members of the Entergy Nuclear Operations, Inc. (Entergy) staff on June 11, 2010.

The NRC requires that information provided by licensees to the Commission be complete and accurate in all material respects. The NRC relies, to a degree, on licensees to provide accurate information in order to make sound regulatory decisions. The NRC also employs independent verification of plant conditions and information in developing the bases for its licensing decisions and evaluations of licensee performance. The background section of the enclosed report describes how the NRC incorporates an element of independent verification in its oversight and licensing activities.

On February 24, 2010, Entergy verbally notified the NRC that it had taken actions regarding certain employees, including some who were removed from their site positions at Vermont Yankee and placed on administrative leave, as a result of its investigation into alleged contradictory or misleading information, concerning Vermont Yankee, provided to the State of Vermont, which was not corrected. The NRC does not have jurisdiction over the alleged contradictory or misleading information provided to the state. Nonetheless, the NRC was concerned because some of these individuals had responsibilities that involved decision-making communications that were material to the NRC and/or involved NRC-regulated activities. As a

¹ Designation in parentheses refers to an Agencywide Documents Access and Management System (ADAMS) accession number. Documents referenced in this letter are publicly-available using the accession number in ADAMS.

result, the NRC issued a DFI which required that Entergy: 1) confirm that communications over the past five years to the NRC by the aforementioned employees (AFEs), that were material to NRC-regulated activities, were complete and accurate, and provide the basis for that conclusion; 2) describe corrective actions for any identified incomplete or inaccurate communications provided to the NRC by the AFEs; 3) describe how appropriate regulatory program implementation is being provided for, in light of organizational changes resulting from Entergy's investigation; 4) describe how adverse implications to site safety culture resulting from Entergy's investigation are being identified and addressed; and 5) make the results of Entergy's investigation available to the NRC for review.

Entergy submitted its DFI response to the NRC by letter dated March 31, 2010 (ML100910420). Entergy concluded, in part, that based on the results of its assessment, the information provided to the NRC by the AFEs was complete and accurate.

On April 5, 2010, the NRC Executive Director for Operations authorized a deviation from the reactor oversight process (ROP) to provide the NRC resources to: 1) conduct the assessment, follow-up, and stakeholder communications associated with the DFI; as well as 2) inspections and communications associated with on-site groundwater contamination. On April 9, 2010, the NRC informed Entergy (ML100990409) that the DFI response was of sufficient scope and depth to allow the NRC to initiate its detailed review, supplemented by independent inspection. These inspections and reviews were conducted under the ROP baseline inspection program and the NRC Deviation Memorandum approved on April 5, 2010 (ML100960321), and examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations, and with the conditions of your license. Nineteen regional and headquarters staff members (the team), including regional inspectors, licensing reviewers, qualified safety culture assessors, a special agent from the NRC Office of Investigations (OI), a senior enforcement specialist, and a regional counsel, conducted on-site inspections, personnel interviews, and document reviews. The reviews were conducted at Vermont Yankee, Entergy's Corporate White Plains, New York office, and the Philadelphia, Pennsylvania office of Morgan, Lewis & Bockius, LLP (MLB).

No findings were identified during the inspections and reviews. Overall, the NRC determined that information and communications, which were reviewed by the team and were material to the NRC and/or NRC-regulated activities, were complete and accurate. This conclusion was based on the team's independent inspection and review, which focused on communications in which the AFEs had involvement over a five year period. The team reviewed one instance in which Entergy identified that inaccurate information that was not material to NRC decision-making was provided in a March 2005 response to a Request for Additional Information. The team independently confirmed that the information was not material to an NRC decision; however, Entergy should understand the circumstances that resulted in the inaccurate information. Entergy has initiated corrective actions, which the NRC will review under its baseline inspection program.

The NRC reviewed the site safety conscious work environment (SCWE), a key component of safety culture, and determined that the Entergy investigation and resulting actions taken regarding the AFEs did not have a negative impact. Additionally, the team determined that the results of the NRC's independent SCWE inspection were consistent with the conclusions in the Vermont Yankee safety culture surveys. The team identified one instance in an Entergy safety

culture survey in which Entergy's initial follow-up of a respondent's interview was not appropriate in that potential SCWE concerns were not addressed and other aspects of the interview were referred to the respondent's supervisor, who was the subject of the respondent's potential SCWE concerns. While subsequent licensee follow-up with the respondent indicated that there were no SCWE-related concerns, Entergy's inappropriate initial response to the interview warranted corrective actions, which the NRC will review under its baseline inspection program.

The NRC also concluded that, in light of the organizational changes Entergy implemented as a result of its investigation, Entergy has provided for continued acceptable regulatory program performance at Vermont Yankee. Finally, the team's review of the Entergy investigation report prepared by MLB, confirmed that no immediate safety issues, allegations, or NRC regulatory impacts were identified.

The NRC considered the results of this inspection as part of its determination of whether Entergy met the requirements of the DFI, and provided its conclusion in the NRC letter to Entergy dated June 17, 2010 (ML101670271). Specifically, the NRC determined that Entergy has met the requirements of the DFI and that no further NRC regulatory action concerning this matter is warranted. In light of this determination, the NRC has also concluded that the criterion related to the DFI in the Deviation Memorandum has been met. The NRC continues to review issues regarding Vermont Yankee's on-site groundwater contamination as part of its enhanced oversight authorized under the Deviation.

We will conduct a public annual assessment meeting in Brattleboro, Vermont, on June 22, 2010. The public meeting will include discussion of the NRC's assessment of Vermont Yankee's safety performance for calendar year 2009, and the role of the agency in ensuring safe plant operations. In addition, we will discuss the inspection activities and review of areas identified in the DFI. The meeting will also include discussion of the NRC's groundwater task force. The details of this meeting were published in a Notice of Public Meeting on June 3, 2010 (ML101540331).

M. Colomb

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

A handwritten signature in black ink, appearing to read "D. Lew", written over a horizontal line.

David C. Lew, Director
Division of Reactor Projects

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

Enclosure: Inspection Report No. 05000271/2010007
w/ Attachment: Supplemental Information

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

David C. Lew, Director
Division of Reactor Projects

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

Enclosure: Inspection Report No. 05000271/2010007
w/ Attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No.: 50-271

License No.: DPR-28

Report No.: 05000271/2010007

Licensee: Entergy Nuclear Operations, Inc.

Facility: Vermont Yankee Nuclear Power Station

Location: 320 Governor Hunt Road
Vernon, Vermont 05354-9766

Dates: April 5 through June 11, 2010

Team Leader: Marjorie McLaughlin, Senior Enforcement Specialist, Office of the Regional Administrator (ORA), Region I

Team Members: Brice Bickett, Senior Project Engineer, Division of Reactor Projects (DRP), Region I
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Donald Brittner, Project Manager, DLR, NRR
Thomas Burns, In-Service Inspection (ISI) Inspector, Division of Reactor Safety (DRS), Region I
Gregory Casto, Branch Chief, Division of Safety Systems, NRR
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David Pelton, Branch Chief, Aging Management of Plant Systems, DLR,
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Thomas Setzer, PE, Senior Project Engineer, DRP, Region I
George Smith, Security Inspector, DRS, Region 1

Approved by: David C. Lew, Director
Division of Reactor Projects
Region I

SUMMARY OF FINDINGS

IR 05000271/2010007; 04/05/2010 – 06/11/2010; Vermont Yankee Nuclear Power Station; NRC Inspection and Review of Areas Identified in Demand for Information.

The report covers the period from April 5 through June 11, 2010, and discusses inspection activities conducted by an inspection team comprised of representatives of NRC's Region I, Office of Nuclear Reactor Regulation (NRR), Office of Enforcement (OE), and the Office of Investigations (OI). The inspection was conducted to independently review the areas identified in the NRC Demand for Information (DFI), dated March 1, 2010 (ML100570237).

Inspection and Review of Areas Identified in Demand for Information

The team determined that information and communications, which were reviewed by the team and were material to the NRC and/or involved NRC-regulated activities, were complete and accurate. The team verified that the scope of relevant communications in which the aforementioned employees (AFEs) had involvement over a five year period was appropriate. The team independently reviewed an extensive sample, which included information and communications related to inspection activities, license amendment reviews (including the Extended Power Uprate amendment and Technical Specifications (TS) changes), license renewal, condition reports (CRs), event notifications (ENs), and emails. The review included both onsite and offsite inspection activities. This involved document reviews, component walk-downs, and Entergy Nuclear Operations (Entergy) staff interviews. The team reviewed one instance in which Entergy identified that it had provided inaccurate information to the NRC in a March 2005 response to a Request for Additional Information. The team determined that the information was not material to an NRC decision; however, Entergy should understand the circumstances that resulted in the inaccurate information. Entergy has initiated corrective actions, which the NRC will review under the baseline inspection program.

A focus of the inspection included information provided by Entergy that was material to the Vermont Yankee license renewal application (LRA). The team reviewed a variety of the license renewal activities performed by Entergy covering a broad range of structures, systems, and components (SSCs) with a particular focus on Entergy's approach to managing the aging of piping that is buried (i.e., in contact with soil) and/or underground (i.e., located below grade and contained in a vault or other structure where it is exposed to air and where access is limited). The team concluded that the information provided by Entergy, material to the Vermont Yankee operating license, and its license renewal application was complete and accurate.

The team also concluded that, in light of the organizational changes Entergy implemented as a result of its investigation, Entergy has provided for continued acceptable regulatory program performance at Vermont Yankee. Furthermore, the positions vacated by the AFEs were appropriately staffed and Entergy had suitable plans for permanently filling the positions in which personnel had been temporarily placed.

The team determined that the Entergy investigation and resulting actions taken regarding the AFEs did not have a negative impact on the site SCWE. The NRC evaluation of the site safety conscious work environment (SCWE), a key component of safety culture, involved review of Entergy safety culture surveys conducted in 2006, 2009, and 2010, and performance of an independent safety culture inspection at Vermont Yankee that included interviews with 72 site personnel. The team identified one instance in an Entergy safety culture survey in which Entergy's initial follow-up of a respondent's interview was not appropriate in that potential SCWE concerns were not addressed and other aspects of the interview were referred to the respondent's supervisor, who was the subject of the respondent's potential SCWE concerns. While subsequent follow-up with the respondent indicated that there were no SCWE-related concerns, Entergy's inappropriate initial response to the interview warranted corrective actions, which the NRC will review under the baseline inspection program.

Additionally, the team conducted a review of the investigation conducted for Entergy by the law office of Morgan, Lewis & Bockius (MLB), and confirmed that no immediate safety issues, allegations, or NRC regulatory impacts were identified in the MLB investigation.

No findings were identified during the inspections and reviews.

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA2 Problem Identification and Resolution (PI&R) (71152)

Background

On February 24, 2010, Entergy Nuclear Operations (Entergy) verbally informed the U.S. Nuclear Regulatory Commission (NRC or Commission) of actions taken regarding certain employees, including some who were removed from their site positions at the Vermont Yankee Nuclear Power Station (Vermont Yankee) and placed on administrative leave, as a result of its investigation into alleged contradictory or misleading information provided to the State of Vermont, concerning Vermont Yankee that was not corrected. The information was related to the existence of underground piping carrying radionuclides at Vermont Yankee. Entergy's internal investigation (ML101650132) concluded that the aforementioned employees (AFEs) did not intentionally mislead the state.

The NRC does not have jurisdiction over the alleged contradictory or misleading information provided to the state. In addition, the NRC was not aware of any instances in which inaccurate or incomplete information was provided by these individuals to the NRC. Nonetheless, the NRC was concerned because some of these individuals had responsibilities that involved decision-making communications that were material to the NRC and/or involved NRC-regulated activities.

The NRC requires that information provided by licensees to the Commission be complete and accurate in all material respects. The NRC relies, to a degree, on licensees to provide accurate information in order to make decisions about license amendments and other licensing actions. Under the reactor oversight process (ROP), the NRC collects information from inspections and Performance Indicators (PIs) in order to enable the agency to arrive at conclusions about the licensee's safety performance. PIs, which are objective measurements of a plant's safety performance, are submitted quarterly by licensees to the NRC and indicate how well a plant is performing when measured against established thresholds for each area.

The NRC also employs independent verification of plant conditions and information to provide the bases for its licensing decisions and evaluations of licensee performance. Through its inspection program, the NRC independently assesses whether activities are properly conducted and equipment is properly maintained to ensure safe operations. The NRC also inspects licensee PI data to determine its accuracy and completeness. Inspectors directly monitor licensee activities, provide inspection findings to the licensee's management, and conduct follow up inspections to ensure that the licensee has taken appropriate corrective action. Resident inspectors are assigned to each nuclear power plant (there are at least two resident inspectors assigned to each site) to provide first-hand, independent assessment of plant conditions and performance. The

activity of the resident inspector is supplemented by engineers and specialists from the regional offices and headquarters staff who perform inspections in a wide variety of engineering and scientific disciplines. The NRC selects an appropriate inspection sample based on potential risk, past operational experience, and regulatory requirements.

Similarly, the NRC may conduct inspections and audits to inform licensing decisions. For example, the NRC has established an inspection program for license renewal that verifies the information that the licensee submitted in its License Renewal Application (LRA). The inspections sample the results of the process used by the licensee to identify those structures and components within the scope of license renewal, aging management programs, and design analysis changes. An additional inspection is performed upon approval of the application and issuance of a new operating license, and prior to entering the period of extended operation. This inspection verifies that the license conditions and license renewal commitments are implemented in accordance with regulations, and that aging management programs are implemented consistent with the descriptions contained in the updated final safety analysis report (UFSAR).

In its consideration of licensing actions, the NRC also conducts a thorough review of licensee-supplied information provided with the licensing request. The NRC processes approximately 950 licensing actions for nuclear power plant licensees per year. These licensing actions range from changes in position titles to significant restructuring of Technical Specifications (TS), as well as power uprate and license renewal requests. The evaluation of a licensee's request involves review of the information supplied by the licensee and is typically supplemented by additional information requested by the NRC staff when the information was not included in the initial submittal; is not contained in any other docketed correspondence; or cannot reasonably be inferred from the information available to the staff. This information is generally requested through a formal Request for Additional Information (RAI), or other communications with licensees.

The NRC can take enforcement action for issues involving the deliberate submittal of inaccurate or incomplete information, whether they are associated with a licensing action or with an inspection. In such instances, an extent of condition review is conducted to understand the overall impact and to inform enforcement decisions. In addition to the NRC reviews conducted in accordance with licensing and inspection activities, the NRC gains valuable insights into the day-to-day practice of licensees through allegations raised by employees that work in NRC-regulated activities or by other knowledgeable sources. The NRC evaluates each allegation and provides a timely response commensurate with the safety and regulatory risk involved. The allegation process provides another avenue for the NRC to identify and look into potential issues in which inaccurate or incomplete information may have been provided to the Commission.

Although the NRC verifies licensee information through its inspection and licensing processes, it is required that the information provided to the NRC by licensee officials be complete and accurate in all material respects. When Entergy informed the NRC that it had taken actions regarding certain employees for providing contradictory or misleading information to the state, the NRC was concerned because some of these individuals had

responsibilities that involved decision-making communications that were material to the NRC and/or involved NRC-regulated activities. Consequently, the NRC issued Entergy a Demand for Information (DFI) on March 1, 2010. In the DFI, the NRC required that Entergy: 1) confirm that communications over the past five years to the NRC by the AFEs, that were material to NRC-regulated activities, were complete and accurate, and provide the basis for that conclusion; 2) describe corrective actions for any identified incomplete or inaccurate communications provided to the NRC by the AFEs; 3) describe how appropriate regulatory program implementation is being provided for, in light of organizational changes resulting from Entergy's investigation; 4) describe how adverse implications to site safety culture resulting from Entergy's investigation are being identified and addressed; and 5) make the results of Entergy's investigation available to the NRC for review.

In its March 31, 2010, response to the NRC, Entergy noted that it found no evidence of incomplete or inaccurate information material to NRC-regulated activities provided by the AFEs to the NRC in the past five years. Entergy further stated that it filled the positions resulting from the organizational changes with qualified individuals and that it implemented change management plans to effect their transition. In addition, Entergy described the method and results of an additional review conducted for Entergy by the law offices of MLB to identify any adverse effect that the investigation and resulting personnel actions may have had on the Vermont Yankee safety culture. Entergy related that the independent review identified that there had been no adverse effect on the safety culture at Vermont Yankee. Finally, Entergy affirmed that it made the results of the investigation available for the NRC to review.

The NRC staff conducted an initial review of Entergy's response and assessed the rigor and acceptability of the licensee's identification and evaluation of the relevant communications. On April 9, 2010, the NRC informed Entergy that its submittal was of sufficient scope and depth to allow the NRC to initiate a detailed review and independent assessment of Entergy's conclusions set forth in the response to the DFI. This report documents the results of the detailed, independent review and inspection. These activities were in addition to the NRC's Reactor Oversight Program baseline inspections and had been authorized by the NRC Executive Director for Operations on April 5, 2010.

Demand for Information Response Inspection

The DFI required that Entergy address the five areas described above. The following sections of this report describe each area and the NRC's actions to independently assess each area, and also provide the NRC's resulting conclusions.

- .1 DFI Item #1: Information regarding whether communications over the past five years to the NRC by the AFEs that were material to NRC-regulated activities were complete and accurate, and the basis for that conclusion. The communications shall include, but not be limited to, required reports to the NRC, interactions with NRC inspection staff, and submittals to support NRC licensing decisions, including the license renewal process. The information shall also describe any impacts on safety and security for any communications to the NRC found to be incomplete or inaccurate. Any corrective

actions or compensatory measures taken or planned to address any incomplete or inaccurate communications provided to the NRC by the aforementioned employees.

a. Inspection Scope

The team obtained from Entergy the list of communications it reviewed for its response. The team identified that the list involved approximately 1300 communications, including: the Vermont Yankee license renewal application and related amendments; operator licensing submittals; TS changes; annual reports; Licensee Event Reports; Emergency Plan changes; responses to Notices of Violations; responses to licensing RAls; responses to allegation Requests For Information; communications related to the proposed Entergy spinoff; fleet-wide license amendment requests; nuclear insurance information; fleet service lists; event notifications; condition reports (CRs); Advisory Committee on Reactor Safeguards and Atomic Safety and Licensing Board Panel testimony transcripts; emails between the NRC and Entergy staff; and NRC inspection reports. The team noted that the 1300 communications included 675 emails, which Entergy identified through an ADAMS search. The team conducted its own ADAMS search for relevant emails and identified that Entergy's list included correspondence from the NRC to Entergy and also correspondence that did not involve the AFEs. The team independently reviewed the emails it identified in ADAMS and determined that 11 emails were from Entergy staff to the NRC and involved the AFEs. The team conducted additional, independent in-office searches of NRC databases, such as ADAMS and enforcement and allegations databases, to determine if the scope of communications identified by Entergy was appropriate relative to the DFI requirement.

The team identified that Entergy had evaluated communications conducted with the NRC by any of its staff over the past five years that involved Vermont Yankee (and not just those communications that were made by the AFEs). The team interviewed Entergy staff and requested clarification about which of these communications significantly involved the AFEs. The team selected a targeted sample of the full list of communications reviewed by Entergy and evaluated Entergy's basis for concluding that the communications were complete and accurate. This sample of more than 250 communications primarily consisted of communications that Entergy identified as significantly involving the AFEs, and also included a selection of the remaining communications. Specific documents that the team reviewed during the inspection are listed in the Attachment to this report.

The team conducted an on-site inspection of Entergy's documented basis for concluding that the reviewed communications were complete and accurate at Entergy's offices in White Plains, New York. For each reviewed communication, the team analyzed: the contents of the communication; the level and type of AFE involvement; how the NRC used the information; the level of initial NRC review of the information; and an evaluation of whether the information had been verified through other means. Additionally, the team evaluated whether Entergy's justification for determining the communication was complete and accurate was reasonable, in which case the team determined that no further inspection of the document was required, or if the team should conduct additional inspection of the communication.

For those communications for which the team could not readily verify Entergy's conclusion (approximately 64) the inspection team conducted further review, involving independent verification of the information provided, interviews with involved staff, and/or on-site inspection of related components. The additional inspections involved in-office review of the communications, independent verification of the information provided, interviews with involved staff, and/or on-site inspection of related components. For communications related to licensing actions, the team performed a technical review comparing the data provided against relevant codes and standards, regulatory guidance, plant TS and the Updated Final Safety Analysis Report (UFSAR), and other available plant data. The team reviewed both the subject communications as well as related documents, such as additional RAIs and responses for the subject requests and the NRC safety evaluations that documented disposition of the request and how the information in the communication was utilized.

The team noted that Entergy identified one communication (a 2005 response to an RAI related to a 2003 relief request) that contained inaccurate data in a table. The team reviewed Entergy's conclusion that the information was not material to the NRC, because it was not relied upon in the NRC Safety Evaluation related to the request. Additionally, the team reviewed Entergy's corrective actions related to this communication. The team's conclusions related to this issue are described in the next section of this report.

The team conducted a review of the license renewal activities performed by Entergy (e.g., scoping, aging management reviews, development of aging management programs, etc.) covering a broad range of SSCs with a particular focus on Entergy's approach to managing the aging of piping that is buried (i.e., in contact with soil) and underground (i.e., located below grade and contained in a vault or other structure where it is exposed to air and where access is limited). This review was performed both in-office at NRC Headquarters and on-site at Vermont Yankee, and involved the following activities:

- The team selected a statistical sample of 82 plant mechanical, electrical, and structural components from the Vermont Yankee Plant Equipment Database, and extracted information (e.g., system, function, tag number, location, name, etc.) from the database for each component. The team then interviewed Entergy regarding the systems and associated components to determine whether they were required to be subjected to an aging management review (AMR), in accordance with 10 CFR Part 54.4. The team also conducted plant walk-downs and document reviews to independently verify that each component in the sample had been appropriately scoped and subjected to an aging management review.

- The team selected a statistical sample of 35 plant mechanical, electrical, and structural components from the AMR tables in the Vermont Yankee LRA. The team extracted information on the component's system, material and environment from the LRA. The team performed walk-downs of the accessible sampled components to verify the components' material and environment. If a sampled component was not accessible, the team reviewed plant documentation including the UFSAR, plant system and design drawings, plant design specifications, plant system descriptions, and component vendor manuals to determine the component's material and environment.
- The team reviewed the site yard piping drawings to identify buried and underground piping located on-site. The team performed walk-downs of yard areas and conducted interviews with the buried piping program engineer. The team also reviewed the results of system walk-downs previously performed by NRC inspectors during the performance of NRC Inspection procedure (IP) 71002, "License Renewal Inspection" as documented in NRC Inspection Report 05000271/2007006, dated June 4, 2007. Additionally, the team observed exposed portions of buried piping that had been previously excavated by Entergy in conjunction with actions taken to investigate the cause of a leak from an underground portion of piping in the augmented off-gas (AOG) system. The team compared the results of this review to a list of buried and underground piping Entergy had provided in preparation for this audit.
- The team reviewed the LRA to determine which systems or portions of systems Entergy described as 1) being within the scope of license renewal, and 2) containing buried and/or underground piping. The team compared these systems to the verified list of systems containing buried and/or underground piping, the scoping criteria in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," (SRP-LR) and to the systems described in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report" as including buried and/or underground piping. The team also reviewed the LRA to identify the AMR line-items associated with each in-scope system that included buried and/or underground piping. The team then compared the Aging Management Program (AMP) recommended by Entergy for these line-items to that recommended for the associated line-item in the GALL Report.

b. Findings and Assessments

No findings were identified.

The team independently identified a similar scope of communications over the past five years, conducted between Entergy and the NRC, and related to Vermont Yankee as was identified by Entergy. The team noted that the level of AFE involvement was not always evident from reviewing the communication in ADAMS. However, the files reviewed at Entergy's White Plains, New York office provided more information on who was involved in document preparation and to what degree.

The team determined that, for the majority of the reviewed communications, AFE involvement was limited to review and concurrence or approval of the communication. The team also identified that for communications in which the AFEs did provide input; numerous other Entergy staff had reviewed and certified the information, thereby providing multiple levels of verification. Additionally, the team noted that communications material to the NRC had received thorough independent review by NRC staff, as noted in follow-up RAIs and in documented Safety Evaluation Reports.

The team determined that the technical content of the reviewed documents was thorough and accurate. Additionally, for reviewed communications related to licensing actions, the team determined that the presentation of the issues was clear, reasonable and supported by applicable code references. Based on the sample reviewed, the team concluded that the relevant information related to Vermont Yankee provided by Entergy over the past five years, which involved the AFEs and was material to the NRC, was complete and accurate.

The independent review of license renewal activities additionally concluded that:

- Entergy had appropriately scoped each of the 82 sampled components selected from the Vermont Yankee Plant Equipment Database as either being subject to or not subject to an AMR for license renewal. Further, based on the statistical sampling method, the team concluded that Entergy had appropriately performed scoping and screening evaluations for all plant components.
- The LRA information regarding the material and environment for the selected sample of 35 plant mechanical, electrical, and structural components from the AMR tables in the Vermont Yankee LRA was complete and accurate. Further, based on the statistical sampling method, the team concluded that the LRA information was complete and accurate for all plant materials and environments.
- The team did not identify any discrepancies with Entergy's accounting of buried and underground piping on-site.
- The LRA included and accurately described systems within the scope of license renewal that contained buried and/or underground piping. Furthermore, Entergy had appropriately applied AMP B.1.2, "Buried Piping and Tank Inspection Program," to the in-scope portion of systems containing buried piping and had appropriately applied AMP B.1.28, "System Walkdown Program," to the in-scope portion of systems containing underground piping.
- Since the May 2008 issuance of NUREG-1891, "Safety Evaluation Report (SER) related to the License Renewal of Vermont Yankee Nuclear Power Station," there have been a number of examples of industry operating experience involving corrosion and leakage of in-scope buried and underground piping. Additionally, Vermont Yankee has recently experienced leakage from an underground portion of piping within the AOG system. While this leakage was not from a portion of the AOG system that is within the scope of license renewal, there are portions of in-scope piping systems that are in a similar environment

(i.e., contained in a vault or other structure where it is exposed to air and where access is limited).

The team concluded that Entergy should re-evaluate AMP B.1.2 to determine if enhancements were warranted to account for lessons learned from industry and Vermont Yankee-specific operating experience and should revise the LRA, as appropriate (the NRC had been pursuing and will continue to pursue this issue generically with all license renewal applicants). Entergy agreed to perform this evaluation and supplement its LRA to address this issue.

- During its review, the team noted that UFSAR Supplement A.2.1.32, associated with AMP B.1.28 does not state how aging effects will be managed for components that are inaccessible during both plant operations and refueling outages. Discussions with Entergy staff revealed that some in-scope underground piping were in pipe chases or vaults where physical access to the external surfaces of the piping was not possible d
- During any modes of operation. Both the GALL Report and the SRP-LR recommend that surfaces that are inaccessible or not readily visible during both plant operations and refueling outages be inspected at such intervals that would provide reasonable assurance that the effects of aging will be managed such that applicable components will perform their intended function during the period of extended operation.

The team concluded that Entergy should revise the Vermont Yankee LRA UFSAR Supplement A.2.1.32 to clarify program requirements for the inspection of surfaces that are inaccessible or not readily visible during both plant operations and refueling outages. Entergy agreed to supplement its LRA with this information.

- .2 DFI Item #2: Any corrective actions or compensatory measures taken or planned to address any incomplete or inaccurate communications provided to the NRC by the aforementioned employees.

a. Inspection Scope

The team reviewed Entergy's basis for concluding that communications over the past five years by the AFEs, that were material to NRC-regulated activities, were complete and accurate. The team interviewed Entergy personnel to determine if issues identified during Entergy's audit were required to be entered into the corrective action program (CAP) for resolution, or if compensatory measures were required to have been taken.

The team reviewed Entergy CR 2010-01236, which described an October 2003 relief request (Relief Request RI-01, Entergy letter BVY 03-89 (ML032810440)) and an associated March 31, 2005, RAI response to the NRC that had been determined by Entergy to contain several errors. The team reviewed the errors in the submittal to determine if the incorrect information was material to the NRC decision to grant the relief request. The inspectors reviewed the relief request submittal to determine if any

of the AFEs provided information that was material to the NRC's decision. Specific documents reviewed during the inspection are listed in the Attachment to this report.

b. Findings and Assessments

No findings were identified.

The team verified that there were no instances in which incomplete or inaccurate information, that was material to the NRC and/or NRC-regulated activities, was provided by the AFEs.

The team concluded that the errors Entergy identified in its RAI response related to the October 1, 2003, relief request were not material to the NRC's decision to grant the relief. Entergy submitted the relief request, "Supplement 2 to Fourth-Interval In-Service Inspection (ISI) Program Plan – Submittal of Relief Request RI-01," requesting approval to implement various Boiling Water Reactor Vessel Internals Program (BWRVIP) guidelines in lieu of select American Society of Mechanical Engineers (ASME) Section XI requirements for in-service inspection of reactor pressure vessel internal components. On January 4, 2005, the NRC submitted an RAI (ML043620442) regarding RI-01, in part, requesting that Entergy provide the total population of the welds that existed versus the total number that were to be inspected for each subject component. The NRC requested this information because Entergy's original request provided only the number of welds to be inspected, and not the total number. In its March 31, 2005, response (ML050950218), Entergy provided a table which identified the total number of welds in each reactor internal component to be inspected. During Entergy's audit of documents applicable to this DFI, Entergy identified five instances in the table in which an incorrect total number of welds were reported (note that one of these instances had been corrected by a subsequent Entergy letter, dated June 8, 2005) (ML051650262)).

After discovering the error during its review of the communication for the DFI response, Entergy notified the NRC, generated CR 2010-01236, and evaluated whether formal notification to the NRC was required. The NRC inspection team independently reviewed the errors contained in the table and concluded that the errors were not material to the NRC's decision to grant the relief request. The relief request and the NRC's subsequent approval were based on Entergy's proposed use of the alternate guidelines for performing weld inspections, and were not based on the total number of welds in each component. The team concluded that the errors would not have changed the NRC's conclusion to grant the requested relief.

The team reviewed this issue in accordance with NRC Inspection Manual Chapter 0612, Appendix B, "Issue Screening," and determined that it did not constitute a violation of NRC requirements.

- .3 DFI Item #3: A description of how, in light of the organizational changes made in response to the investigation, Entergy is providing for appropriate implementation of NRC-regulated programs (e.g., Regulatory Licensing, Security, Emergency Preparedness, etc.)

a. Inspection Scope

The team interviewed Entergy licensing and human resources personnel regarding the change management plans for filling the positions vacated by the AFEs. The team also reviewed the qualifications of the personnel temporarily and/or permanently filling these positions. The team reviewed applicable standards to identify training and experience requirements for any of the impacted positions and evaluated the qualifications of the replacement staff against these requirements.

b. Findings and Assessments

No findings were identified.

The team concluded that the positions vacated by the AFEs were appropriately staffed, and that Entergy had suitable plans for permanently filling the positions in which personnel had been temporarily placed. The team also concluded that the personnel filling these positions were qualified in accordance with applicable standards. Based on its review of their qualifications, the team identified that the staff filling the AFE positions had adequate site and industry experience and appropriate backgrounds for these functional assignments. The team further determined that the organizational changes had not negatively impacted Entergy's implementation of NRC-regulated programs at Vermont Yankee. Entergy addressed some impacts to NRC-regulated programs by providing additional support from other sites and its corporate offices.

- .4 DFI Item #4: A description of how Entergy is identifying and responding to adverse implications to the Vermont Yankee site safety culture as a result of this investigation, its findings, and the actions taken regarding the aforementioned employees.

a. Inspection Scope

The team performed a review at the Entergy White Plains, New York office of the 2006 and 2009 Vermont Yankee safety culture surveys conducted by Synergy Consulting Services Corporation (Synergy). The surveys were reviewed to gain insights into the work environment for each respective department at Vermont Yankee, and to determine if individuals raised safety issues that required follow-up. The team reviewed both the safety culture summary report prepared by Synergy, and write-in comments provided anonymously by surveyed individuals to better understand how the site safety culture had performed since the 2006 survey to 2009.

The team performed a review at the Entergy White Plains, New York office of the report summarizing the results of the Vermont Yankee safety culture survey that MLB conducted for Entergy in response to the DFI. The team reviewed 52 exhibits which included the survey questions, interviewer notes, and interviewee responses for each

respective interview. The team interviewed the Employee Concerns Program (ECP) coordinators of the Entergy White Plains, New York office and the Vermont Yankee site. Additional phone meetings were conducted with the ECP coordinators and attorneys from the law offices of MLB to evaluate the context of the interviewer notes and interviewee responses.

An additional group of NRC inspectors independently performed an on-site review of the SCWE existing at Vermont Yankee. The inspectors interviewed a total of 72 individuals on-site which included 10 focus groups, 15 scheduled individual management interviews, and multiple unscheduled, unstructured individual interviews. The inspectors also conducted observations of work activities, shift turnovers, and management meetings. Plant staff members interviewed were randomly selected from the Nuclear Safety Assurance, Security, Operations, Radiation Protection, Chemistry, Maintenance, and Engineering organizations. The inspectors also reviewed selected internal CRs and two recent SCWE survey assessments conducted by independent contractors.

b. Findings and Assessments

No findings were identified.

The team determined that the Entergy investigation and resulting actions taken regarding the AFEs did not have a negative impact on the site SCWE. The report of the MLB safety culture survey at Vermont Yankee included 95 interviews of Vermont Yankee staff. The 95 interviews included staff from departments in which a manager was replaced as a result of the investigation, and also departments in which no changes were made. The 95 interviews included the AFEs, and staff in Nuclear Safety Assurance, Engineering, Maintenance, Operations, Chemistry, Radiation Protection, Outage, Safety, and Entergy Continuous Improvement. Respondents were asked questions regarding their willingness to raise a safety issue, whether they feared retaliation if they raised such issues, and whether the recent actions taken regarding the aforementioned employees had an affect on their willingness to raise issues.

Many respondents indicated that the Vermont Yankee site management team often encouraged staff to raise nuclear safety issues. Site leadership up to and including the Site Vice President were noted in many interviews as having not retaliated against staff for raising safety issues. The interviews indicated that the site felt free to use the ECP, but had seldom or never had to the need to do so because of other avenues being an effective route to solve issues (e.g., using the CAP and/or notifying their supervisor).

In its review of the MLB safety culture survey report, the team discovered one interview in which a respondent indicated that he/she would be hesitant to raise a concern about his/her supervisor. The inspectors questioned Entergy to determine if any follow up was done with this individual, and determined that Entergy's initial follow-up was not appropriate in that the potential SCWE concerns were not addressed and other aspects of the interview were referred to the respondent's supervisor, who was the subject of the respondent's potential SCWE concerns. Entergy indicated that during subsequent discussion with the respondent, he/she indicated that his/her concerns related to scheduling issues and other personnel management concerns. As a result of the NRC's

inspection, Entergy ECP personnel opened a file to further investigate the respondent's issues. Additionally, Entergy generated CR Number HQN-2010-00358 to evaluate if there are any generic concerns with the ECP for not initially following-up on the individual's potential SCWE concern. The NRC will evaluate Entergy's actions in response to this issue during the next scheduled Problem Identification and Resolution inspection, currently scheduled for the spring of 2011.

The team determined that in light of the above; further investigation into the Vermont Yankee SCWE was warranted. The team of inspectors who performed the on-site review at Vermont Yankee determined that the SCWE at Vermont Yankee had not been negatively impacted or degraded by the recent actions taken regarding the aforementioned employees (AFEs). The inspectors determined that while one individual had expressed in his/her interview hesitancy to raise a safety concern, this was not indicative of the site SCWE as a whole, and that follow-up by the site ECP program was appropriate. Additionally, the team determined that the results of the NRC's independent SCWE inspection were consistent with the conclusions in the Vermont Yankee safety culture surveys.

Interview comments and observations of staff activities conducted by the NRC indicated that the plant staff members understood the reasons behind the actions Entergy took regarding the AFEs, and that they had not been inhibited from reporting safety concerns using the condition reporting system because of these actions. Plant staff members interviewed expressed a heightened awareness of the necessity of reporting safety concerns and frequently expressed their commitment to assuring that any reported safety concerns were clearly understood. While plant staff members were also well aware of the availability of alternate reporting channels including the ECP and reporting concerns directly to the NRC, the vast majority indicated that these channels were infrequently used because the internal condition reporting system and managements' open door policy was generally effective in resolving safety concerns.

The team reviewed this issue in accordance with NRC Inspection Manual Chapter 0612, Appendix B, "Issue Screening," and determined that it did not constitute a violation of NRC requirements.

- .5 DFI Item #5: Confirmation that Entergy intends to make the investigation available to the NRC to allow the NRC to independently evaluate Entergy's investigation for any impact on NRC-regulated activities.

a. Inspection Scope

On March 10, 2010, the team, including the NRC Region I Regional Counsel; a Region I Senior Project Engineer; and a Special Agent from the NRC Office of Investigations, reviewed the investigation report in the law offices of MLB in Philadelphia, Pennsylvania. The team reviewed the MLB investigation report, nine volumes of exhibits and the underlying attorney's "notes of interview" of approximately 30 individuals.

The team's overall objective was to review the MLB investigation report for immediate safety issues, allegations, and possible NRC regulatory impacts. Specifically, the team

reviewed the MLB investigation report to determine: 1) the conclusions and the basis for those conclusions; 2) if the investigation report suggested any information provided in communications to the NRC by the AFEs was not complete and accurate; 3) if there was any information that may reflect of the safety culture at Vermont Yankee; 4) insights on further regulatory oversight activities to better inform inspection follow-up at Vermont Yankee or other Entergy sites; 5) any immediate safety and allegation issues.

b. Findings and Assessments

No findings were identified.

The team did not identify any safety issues, allegation issues, or NRC regulatory impacts based on the review of the MLB investigation report or the exhibits and notes made available to the team. The team reviewed the evidence/factual information presented in the investigation report and determined that the conclusions and basis for the conclusions were supported by this information. The team did not identify any safety issues or information that would indicate that information provided by Entergy to the NRC may be less than accurate. The team did not identify information in the MLB investigation report that would indicate a significant concern or margin reduction within the safety culture that currently exists at Vermont Yankee. The team determined that the additional review of recent Entergy correspondence (described in Section 40A2.1 of this report) was appropriate.

40A6 Meetings, Including Exit

On June 11, 2010, the team presented the inspection results to Mr. John F. McCann, Vice President, Nuclear Safety, Emergency Planning and Licensing, and to other members of the Entergy staff. The team verified that no proprietary information was documented in the report.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION**KEY POINTS OF CONTACT****Licensee personnel**

G. Bailey	Entergy Vermont Yankee, Buried Piping and Tank Program Manager
J. Balla	Entergy White Plains, Employee Concerns Program
M. Colomb	Entergy Vermont Yankee, Site Vice President
J. Cox	Entergy Vermont Yankee, Supervisor, Radiation Protection Operations
W. Dennis	Entergy Assistant General Counsel
J. Devincentis	Entergy Vermont Yankee, Manager, Licensing
J. Ecker	Morgan, Lewis & Bockius, LLP
T. Emery-Howe	Entergy Vermont Yankee, Supervisor, Access Authorization/Fitness for Duty
C. Faison	Entergy White Plains, Manager, Licensing Programs
J. Geyster	Entergy Vermont Yankee, Supervisor, Radiation Protection Operations
J. Hardy	Entergy Vermont Yankee, Manager, Chemistry
A. Huffman	Entergy Vermont Yankee, Senior Security Coordinator
D. Jones	Entergy Vermont Yankee, Shift Manager
G. Lozier	Entergy Vermont Yankee, Director of Nuclear Safety Assessment
R. Meister	Entergy Vermont Yankee, Licensing Staff
J. Patrick	Entergy Vermont Yankee, Superintendent, Security Operations
M. Philippon	Entergy Vermont Yankee, Manager, Operations
N. Rademacher	Entergy Vermont Yankee Director of Engineering
J. Robinson	Entergy Vermont Yankee, License Renewal Project Staff
J. Rodgers	Entergy Vermont Yankee, Manager, Design Engineering
M. Romeo	Entergy Vermont Yankee, Manager, Training Development
C. Rose	Entergy Vermont Yankee, Coordinator, Employee Concerns
P. Ryan	Entergy Vermont Yankee, Manager, Security Operations
C. Thebaud	Morgan, Lewis & Bockius, LLP
E. Tinkham	Entergy Vermont Yankee, Manager, Human Resources
D. Tkatch	Entergy Vermont Yankee, Manager, Radiation Protection
C. Wamser	Entergy Vermont Yankee, General Manager, Plant Operations

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**Opened and Closed**

None

LIST OF DOCUMENTS REVIEWED

Plant Drawings

G-191230, Site Yard Piping Plan, Sheet 1
G-191231, Yard Piping Plan, Sheet 2
G-191232, Yard Piping Sections and Details
G-191238, Drywell Cooling System
G-191160, Service Air System, HVAC, Main Steam System
G-191142, Switchyard Control Building
G-191274, Instrument Air System
G-191157, Shutdown Iodine Drain System
G-191162, Diesel Fuel Oil System
G-191163, Rx Bldg I&C Hotshop
G-191175, Torus/Drywell Pumpback System
G-191176, AOG Water Makeup
5920-4147, Diesel Generator Cooling System
5920-11827, House Heating Boilers FOST System Miscellaneous Details
5920-13012, Site Plan for NW Leach Field and Force Main from South Sewage Disposal System
5920-12894, Hydrogen Storage Site Plan Underground Utilities South Warehouse Area, Sht 1
5920-12894, Hydrogen Storage Site Plan Underground Utilities South Warehouse Area, Sht 15
5920-12894, Hydrogen Line Plan and Profile and Underground Utility Details, Sht 3
5920-12894, Hydrogen Storage Site Plan Underground Utilities South Warehouse Area, Sht 15
5920-12894, Hydrogen Storage Site Plan Details and Notes, Sheet 154
5920-FS-307, Composite Underground West, Sht 1
5920-FS-307, Composite Underground North, Sht 2
5920-FS-307, Composite Underground East, Sht 3
5920-FS-307, Composite Underground South, Sht 4

License Renewal Documents

BVY-05-093, Notice of Intent to Submit License Renewal Application
BVY-06-009, License Renewal Application
BVY-06-063, License Renewal Application Amendment 4
BVY-06-064, License Renewal Application Amendment 5
BVY-06-076, License Renewal Application Amendment 8
BVY-06-083, License Renewal Application Amendment 12
BVY-06-090, License Renewal Application Amendment 15
BVY-06-091, License Renewal Application Amendment 16
BVY-06-095, License Renewal Application Amendment 18
BVY-06-096, License Renewal Application Amendment 17
BVY-06-097, License Renewal Application Amendment 19
BVY-06-098, License Renewal Application Amendment 20
BVY-06-099, License Renewal Application Amendment 21
BVY-06-100, License Renewal Application Amendment 22
BVY-07-003, License Renewal Application Amendment 23, Attachment 6
BVY-07-009, License Renewal Application Amendment 24
BVY-07-012, License Renewal Application Amendment 25

BVY-07-018, License Renewal Application Amendment 26, Attachment 4
BVY-07-034, License Renewal Application Annual Update
BVY-07-035, License Renewal Safety Evaluation Report Comments
BVY-07-047, License Renewal Application Amendment 27, Attachment 5
BVY-07-054, License Renewal Application Amendment 28
BVY-07-058, License Renewal Application Amendment 29
BVY-07-062, License Renewal Application Amendment 30
BVY-07-066, License Renewal Application Amendment 31
BVY-07-076, License Renewal Application Amendment 32
BVY-07-079, VY Update of Aging Management Program Audit Q&A Database
BVY-07-082, License Renewal Application Amendment 33
BVY-08-002, License Renewal Application Amendment 34
BVY-08-008, License Renewal Application Amendment 35, Attachments 1 and 2
BVY-08-012, License Renewal Application Amendment 36, Attachment 2
BVY-08-016, License Renewal Final Safety Evaluation Report Comments
BVY-10-010, License Renewal – Buried Piping
BVY-10-012, Response to NRC 02/02/10 Letter
CNRO-2005-00056, VYNPS Docket No 50-271 (License No DPR-28) Notice of Intent to Submit License Renewal Application
AMRM-30, Aging management review of NSR and Components Affecting Safety Related Structures, Pages 19 – 20 (Circulating Water), Page 25 (Heating Boiler), Page 27 – 28 (Instrument Air), Pages 32 – 33 (Rad Waste)
LRPD-11, Review of Buried Pipe Related to VYNPS LRA
Verification of Vermont Yankee Nuclear Power Station License Renewal Project Report (Program Basis Documents), Revision 3

Other Licensing Documents

BVY-05-017, Proposed TS Change – EPU RAI Response
BVY-05-010, Request to use Different ASME Code
BVY-05-011, Proposed Change to Drywell Spray Header and Nozzle Air Test Frequency Supplement
BVY-05-030, EPU RAI Supplement 25
BVY-05-032, Response to RAI – IRFM ST Frequency
BVY-05-040, RAI for ILRT Extension
BVY-05-059, Revised RAI Response for Relief Request RI-01
BVY-05-069, RAI Response for Information for Conducting SFP Assessments
BVY-05-081, Supplemental Response to RAI for Information for Conducting SFP Assessments
BVY-05-084, EPU Supplement 33
BVY-05-086, EPU Supplement 34
BVY-05-094, Revision to Control Rod Operability SCRAM time Testing and Control Rod Accumulators RAI
BVY-05-101, TS Proposed Change 263-EPU – Feedwater Transient Testing
BVY-05-103, TS Proposed Change 263-EPU-Steam Dryer Inspection Results
BVY-06-031, Commitment Rev 1 to Steam Dryer Monitoring Plan
BVY-06-036, UFSAR Rev 20
BVY-06-039, Commitment Rev 2 to Steam Dryer Monitoring Plan

BVY-06-042, Commitment Rev 2 to Steam Dryer Monitoring Plan
BVY-06-056, Report on Steam Dryer Monitoring Plan Results
BVY-06-060, SCRAM Time Testing RAI Response
BVY-08-001, TS Change # 273
BVY-08-007, Revision to TS Section 3.3/4.3
BVY-08-031, Revised TS bases Change
BVY-08-037, Commitment Change for Control Room HVAC Isolation Test Periodicity
BVY-08-040, Request for Revision to Existing 10 CFR 50 Appendix R Exemption
BVY-08-043, Commitment Change for Station Blackout Testing
BVY-08-046, Revision of TS Bases Pg 97
BVY-08-047, TS proposed Change 276 Response to RAI
BVY-08-050, TS Proposed Change 276 Supplement 1
BVY-08-052, MSIV testing TS Proposed Change 278
BVY-08-053, TS Proposed Change 279 Section 5.1
BVY-08-055, TS Proposed Change 277 Name Change
BVY-08-058, VY UFSAR Electronic Resubmittal
BVY-08-059, TS Proposed Change 280 Relocate RB Crane TS to TRM
BVY-08-060, Delete Words in 480 V UPS TS Bases
BVY-08-062, TS Proposed Change 273 Supplement 2
BVY-08-066, License Amendment 232 Corrected Page 152
BVY-08-069, TS Proposed Change 281 – Revision to Battery System
BVY-08-070, TS Proposed Change 273 Supplement 3
BVY-08-076, Revision of TS Bases Pages
BVY-08-081, Revision of TS Bases Page 29
BVY-08-085, VY RFO 27 Steam Dryer Inspection Results
BVY-09-035, TS Proposed Change
BVY-09-072, TS Bases Page
VYNPS Technical Specifications
VYNPS Updated Final Safety Analysis Report

Licensed Operator Documents

BVY-05-023, SRO License Exam Results
BVY-05-095, License Restriction due to Change in Medical Condition
BVY-07-068, Confidential
BVY-08-006, Licensed Operator Change in Medical Condition
BVY-08-011, Termination of Operator License
BVY-08-015, Licensed Operator Change in Medical Condition
BVY-08-021, Application for SRO License
BVY-08-026, Licensed Operator Change in Medical Condition
BVY-08-039, Operator License Renewals
BVY-08-042, Termination of Operator License
BVY-08-054, Licensed Operator Change in Medical Condition
BVY-08-061, Licensed Operator Change in Medical Condition
BVY-08-063, Licensed Operator Change in Medical Condition
BVY-08-067, Cancellation of Operator License
BVY-08-068, Cancellation of Operator License

BVY-09-003, Medical Certificates and Preliminary Qualification Statements for License Candidates

BVY-09-008, Final 398 Reports for License Candidates

BVY-09-025, Operator re-application

BVY-09-033, Final 398 Form Submittal

BVY-09-047, Licensed Operator Renewal

BVY-10-005, Licensed Operator Renewal

Emergency Planning Documents

BVY-07-069, VY Emergency Plan Implementing Procedures

BVY-07-070, VY Emergency Plan Rev 43

BVY-08-003, Emergency Plan Change

BVY-08-004, Emergency Plan Implementing Change

BVY-08-019, Change of Emergency EALs

BVY-08-024, Emergency Plan Implementing Procedure Change

BVY-08-035, Change of EALs Basis to NEI 99-01 Rev. 5

BVY-08-056, Emergency Plan Rev 45

BVY-08-057, Emergency Plan Implementing Change

BVY-09-039, Emergency Plan Implementing Procedure Change

Decommissioning/Spent Fuel Documents

BVY-05-033, Status of Decommissioning Funding

BVY-08-010, Report Pursuant to 10 CFR 50.75

BVY-08-017, Decommissioning Fund Status Report

BVY-08-022, RAI Response – Spent Fuel Management Plan

BVY-08-032, ISFSI – Registration of 1st Cask in use

BVY-08-038, ISFSI – Registration of 2nd Cask in use

BVY-08-041, ISFSI – Registration of 3rd Cask in use

BVY-08-044, ISFSI – Registration of 4th Cask in use

BVY-08-051, ISFSI – Registration of Spent Fuel Cask use

ENOC-08-031, Notice Regarding Trustee for Nuclear Decommissioning Funds

Responses to NRC Bulletins, Advisories, Generic Letters, and Regulatory Issue Summaries

BVY-05-028, Response to NRC-BL-2005-001 – MC&A

BVY-06-038, Response to GL-06-02

BVY-08-009, VY Response to NRC BL-2007-01

BVY-08-020, VY 3 Month Response to GL 2008-01

BVY-08-048, BL 2007-01 RAIs

BVY-08-049, Response to RIS-2008-16

BVY-08-071, GL 2008-01 9 Month Response

Security-Related Documents

BVY-05-047, Response to SGI Advisory

BVY-08-014, FFD Performance Report for July 2007-December 2007

BVY-08-018, Physical Security, Safeguards Contingency and Training and Qualification Plan

BVY-08-027, Update to VY Security Plan List of Changes

BVY-08-028, Security Event Report

BVY-08-033, Re-Submittal of Safeguards Information
BVY-08-064, FFD Performance Report Jan 2008 – June 2008
BVY-08-065, Control System Vulnerability RAI Response
CNRO-06-003, Supplement to 30-day Response to NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events"

Vermont Yankee License Renewal Hearing Files

2006 Transcripts, Pleadings, Board Orders, Applicant Exhibits, Intervener Exhibits, Staff Exhibits, Applicant Pre-Filed Testimony, Intervener Pre-Filed Testimony, and Staff Pre-Filed Testimony
2007 Transcripts, Pleadings, Board Orders, Applicant Exhibits, Intervener Exhibits, Staff Exhibits, Applicant Pre-Filed Testimony, Intervener Pre-Filed Testimony, and Staff Pre-Filed Testimony
2008 Transcripts, Pleadings, Board Orders, Applicant Exhibits, Intervener Exhibits, Staff Exhibits, Applicant Pre-Filed Testimony, Intervener Pre-Filed Testimony, and Staff Pre-Filed Testimony
2009 Transcripts, Pleadings, Board Orders, Applicant Exhibits, Intervener Exhibits, Staff Exhibits, Applicant Pre-Filed Testimony, Intervener Pre-Filed Testimony, and Staff Pre-Filed Testimony
2010 Transcripts, Pleadings, Board Orders, Applicant Exhibits, Intervener Exhibits, Staff Exhibits, Applicant Pre-Filed Testimony, Intervener Pre-Filed Testimony, and Staff Pre-Filed Testimony

Environmental Reports

BVY-05-055, 2004 Annual Radiological Environmental Operating Report
BVY-05-056, Annual 2004 Radioactive Effluent Release Report
BVY-06-066, Groundwater Protection – Data Collection Questionnaire
BVY-08-029, 2007 Radioactive Effluent Release Report
BVY-08-030, 2007 Annual Radiological Environmental Operating Report
BVY-09-037, 2008 Radioactive Effluent Release Report
BVY-09-056, ISFSI Annual Radioactive Effluent Release Report

In-Service Inspection-related Documents

BVY-05-027, Supplement to Relief Request RI-01
BVY-07-061, VY 2007 Summary Reports for Inservice Inspection and Repairs or Replacements
BVY-07-071, Re-submittal of Relief Request No. ISI-PT-01, Alternate Testing for Buried Piping Components, Fourth Inservice Inspection Interval
BVY-08-013, Deviation From BWRVIP-130
BVY-09-066, 10 CFR 50.55(a)(3)(i) Inservice Inspection Program Request

Licensee Event Reports

BVY-05-064, LER 2004-003-01
BVY-05-087, LER 2005-001-00, Insulator Failure
BVY-05-104, LER-2005-002-00 V10-198A Found Open
BVY-08-045, LER-2008-001-00 Crane Travel Stops

COLR Reports

BVY-05-085, Revised Core Operating Limits Report for Cycle 24
BVY-05-102, Core Operating Limit Report (COLR) for Cycle 25
BVY-06-023, VYNPS Revised COLR for Cycle 25

Allegations-Related Documents

ENOC-06-003, Response to Request for Investigation (RI-2006-A-0178)
ENOC-06-006, Response to Request for Investigation (RI-2006-A-0034)
ENOC-06-014, Response to Request for Investigation (RI-2006-A-0051)
ENOC-06-022, Response to Request for Investigation (RI-2006-A-0133)
ENOC-07-031, Response to Request for Investigation (RI-2007-A-0054)
ENOC-07-039, Response to Request for Investigation (RI-2007-A-0123)
ENOC-09-042, Response to Request for Investigation (RI-2009-A-0097)

Other Documents

BVY-05-020, Reply to a Notice of Violation, EA-04-173
BVY-05-031, Sources and Levels of Insurance Required by 10 CFR 50.24
BVY-05-105, Correction to Technical Specifications Pages
BVY-06-019, EPU-Dryer Flow Induced Vibration Information
BVY-06-068, Cycle 25 Startup Test Report
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2008-2829
2008-3204
2008-5015
2008-5073
2009-1416
2009-2530
2009-3420

2009-3516
2009-3918
2010-0204
2010-0632
2009-3575
2009-3574
2009-3727
2009-3576
2009-3415
2009-4137
2009-3571
2009-3725
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2010-0518
2010-1321
2010-2165
2010-2280
2010-2673

Event Notifications

41700
41868
42120
42219
42235
42605
42755
42810
42872
42944
43113
43409
43413

43505
43573
43610
43729
44042
44118
44530
44539
44728
45009
45313
45613

LIST OF ACRONYMS

ACRS	Advisory Committee on Reactor Safeguards
ADAMS	Agencywide Documents Access and Management System
AFE	Aforementioned Employees
AMP	Aging Management Program
AMR	Aging Management Review
ANS	American Nuclear Society
ANSI	American National Standards Institute, Inc.
AOG	Augmented Off-gas
ASLB	Atomic Safety and Licensing Board Panel
ASME	American Society of Mechanical Engineers
BWRVIP	Boiling Water Reactor Vessel Internals Program
CAP	Corrective Action Program
DFI	Demand for Information
DLR	Division of License Renewal
DRP	Division of Reactor Projects
DRS	Division of Reactor Safety
ECP	Employee Concerns Program
EN	Event Notification
EP	Emergency Plan
GALL	Generic Aging Lessons Learned
IP	Inspection Procedure
ISI	In-Service Inspection
LER	Licensee Event Report
LRA	License Renewal Application
MLB	Morgan, Lewis & Bockius, LLP
NOV	Notice of Violation
NRC	U.S. Nuclear Regulatory Commission
NRR	Office of Nuclear Reactor Regulation
NSPDP	Nuclear Safety Professional Development Program
NY	New York
OE	Office of Enforcement
OI	Office of Investigations
ORA	Office of the Regional Administrator
PI	Performance Indicator
RAI	Request for Additional Information
RFI	Request for Information
ROP	Reactor Oversight Process
SCWE	Safety Conscious Work Environment
SRP	Standard Review Plan
SRP-LR	Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants
SSC	Structures, Systems, and Components
TS	Technical Specifications
UFSAR	Updated Final Safety Analysis Report
VYNPS	Vermont Yankee Nuclear Power Station