Entergy Nuclear Operations, Inc.
Vermont Yankee
320 Governor Hunt Rd
Vernon, VT 05354
Tel 802 257 7711

Michael J Colomb
Site Vice President

September 3, 2010

BVY 10-050

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

SUBJECT: License Renewal Application Supplemental Information
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

REFERENCES:
1. Letter, Entergy to USNRC, "Vermont Yankee Nuclear Power Station, License No. DPR-28, License Renewal Application," BVY 06-09, dated January 25, 2006.

Dear Sir or Madam:

On January 25, 2006, Entergy Nuclear Operations, Inc. and Entergy Nuclear Vermont Yankee, LLC (Entergy) submitted the License Renewal Application (LRA) for the Vermont Yankee Nuclear Power Station (VYNPS) as indicated by Reference 1.

This letter provides supplemental information to the LRA to address issues that have been discussed in industry correspondence concerning the possibility of non-EQ inaccessible cables failing in the presence of water intrusion. Entergy has completed a review of relevant operating experience and addressed it as discussed in Attachment 1 of this letter.

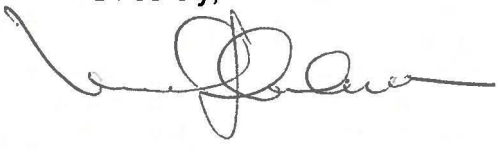
New regulatory commitments to implement related aging management activities have been entered into the VYNPS License Renewal Commitment List, Revision 10 (Attachment 2).

Should you have any questions or require additional information concerning this submittal, please contact Mr. Robert Wanczyk at 802-451-3166.

I declare under penalty of perjury, that the foregoing is true and correct.

Executed on September 3, 2010.

Sincerely,



[MJC/PLC]

Attachments: 1. License Renewal Application Supplemental Information
2. License Renewal Commitment List, Revision 10

cc: Mr. Eric J. Leeds, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
One White Flint North 13H16M
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. William Dean, Regional Administrator
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. Robert Kuntz, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North 11F1
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. James S. Kim, Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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

Mr. David O'Brien, Commissioner
VT Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05620-2601

Attachment 1

Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)

License Renewal Application

Supplemental Information

Vermont Yankee Nuclear Power Station
License Renewal Application - Supplemental Information

Background

Due to industry correspondence regarding inaccessible cables, Vermont Yankee Nuclear Power Station (VYNPS) is providing the following information enhancing its aging management program for non-EQ inaccessible medium-voltage cables to include low-voltage (480 V to 2 kV) cables.

The NRC staff has concluded that inaccessible low-voltage cables (480 V to 2 kV cables that are subject to aging management review for license renewal) potentially exposed to significant moisture should be included in an aging management program (AMP) specifically to address the effects of moisture on the cables.

VYNPS responded to Generic Letter (GL) 2007-01, "Inaccessible or Underground Power Cable Failures That Disable Accident Mitigation Systems or Cause Plant Transients" in a letter dated April 30, 2007 (ADAMS Accession Number ML071290055). In the letter, VYNPS reported that no failures were found during a review of plant operating experience involving low-voltage inaccessible cables.

VYNPS operating experience since the response to GL 2007-01 on April 30, 2007 until August 25, 2010 was researched in the Corrective Action Program database. VYNPS has experienced no age-related failures of inaccessible low-voltage cables that are subject to aging management review subsequent to the response to GL 2007-01.

VYNPS has also reviewed the information provided in the industry responses to GL 2007-01, recent NRC and Electric Power Research Institute guidance documents, and recent industry/NRC meetings on this topic. In light of the NRC Staff's conclusion, VYNPS is expanding the scope of the B.1.17 (Non-EQ Inaccessible Medium-Voltage Cable) aging management program to include in-scope, inaccessible, low-voltage cables.

VYNPS Revision to Inaccessible Cable Program

VYNPS will expand the scope of the program described in License Renewal Application (LRA) Section B.1.17 (Non-EQ Inaccessible Medium-Voltage Cable) to include inaccessible low-voltage (480 V to 2kV) cables that are subject to aging management review. The parameters monitored or inspected, as required by the program, are changed to include inaccessible low-voltage cables that are subject to aging management review. Inaccessible low-voltage (480 V to 2kV) cables will be tested for degradation of the cable insulation at least once every 10 years. Inspections for water in manholes containing in-scope inaccessible low-voltage (480 V to 2kV) cables will be performed at least once every two years. A proven, commercially available test will be used for detecting deterioration of the insulation system for inaccessible low-voltage cables (480 V to 2 kV) potentially exposed to significant moisture.

In addition, LRA Sections A.2.1.19 (Non-EQ Inaccessible Medium-Voltage Cable Program) and B.1.17 (Non-EQ Inaccessible Medium-Voltage Cable) are revised to delete the criterion of "exposure to significant voltage" (system voltage for more than 25% of the time) associated with in-scope inaccessible medium-voltage (2 kV to 35 kV) cables. Section B.1.17 is revised to note that the VYNPS Non-EQ Inaccessible Medium-Voltage Cable Program will be based on and consistent with the program described in NUREG-1801, Section XI.E3.

The changes are presented as strikeout text deleted, and underlined text added.

A.2.1.19 Non-EQ Inaccessible Medium-Voltage Cable Program

In the Non-EQ Inaccessible Medium-Voltage Cable Program, in-scope medium-voltage cables, not designed for, but exposed to significant moisture ~~and voltage~~ are tested at least once every ten years to provide an indication of the condition of the conductor insulation. The specific test performed is a proven test for detecting deterioration of the insulation system due to wetting, such as power factor, partial discharge, polarization index, or other testing that is state-of-the-art at the time the test is performed. Significant moisture is defined as periodic exposures that last more than a few days. ~~Significant voltage exposure is defined as being subjected to system voltage for more than 25% of the time.~~

Inspections for water collection in cable manholes and conduit containing in-scope inaccessible low-voltage and medium-voltage cables will occur at least once every two years.

Inaccessible low-voltage cables (cables with operating voltage from 480 V to 2 kV) that are subject to aging management review are included in this program. Inaccessible low-voltage cables will be tested for degradation of the cable insulation prior to the period of extended operation and at least once every 10 years thereafter. A proven, commercially available test will be used for detecting deterioration of the insulation system for inaccessible low-voltage cables potentially exposed to significant moisture.

B.1.17 Non-EQ Inaccessible Medium-Voltage Cable Program Description

The Non-EQ Inaccessible Medium-Voltage Cable Program at VYNPS will be based on and consistent with ~~comparable to~~ the program described in NUREG-1801, Section XI.E3, Inaccessible Medium-voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements.

VYNPS inspection for water accumulation in manholes is conducted in accordance with a plant procedure. An evaluation per the Corrective Action Process will be used to determine the need to revise manhole inspection frequency based on inspection results.

Medium voltage cables include cables with operating voltage level from 2kV to 35kV. Low-voltage cables include cables with operating voltage ranging from 480 V to 2 kV.

In this program, periodic actions will be taken to prevent cables from being exposed to significant moisture, such as inspecting for water collection in cable manholes and conduit, and draining water, as needed. In scope medium-voltage cables exposed to significant moisture ~~and voltage~~ will be tested to provide an indication of the condition of the conductor insulation. The specific type of test to be performed will be determined prior to the initial test and is to be a proven test for detecting deterioration of the insulation system due to wetting as described in EPRI TR-103834-P1-2, or other testing that is state-of-the-art at the time the test is performed.

Inaccessible low-voltage cables (cables with operating voltage from 480 V to 2 kV) that are subject to aging management review are included in this program. Inaccessible low-voltage cables will be tested for degradation of the cable insulation prior to the period of extended

operation and at least once every 10 years thereafter. A proven, commercially available test will be used for detecting deterioration of the insulation system for inaccessible low-voltage cables potentially exposed to significant moisture.

The program will be initiated prior to the period of extended operation.

NUREG-1801 Consistency

The program attributes of the Non-EQ Inaccessible Medium-Voltage Cable Program at VYNPS will be consistent with the program attributes described in NUREG-1801, Section XI.E3, Inaccessible Medium-Voltage Cables Not Subject To 10 CFR 50.49 Environmental Qualification Requirements.

Exceptions to NUREG-1801

None.

Enhancements

~~None~~ This program includes inaccessible low-voltage cables (480 V to 2 kV) that are subject to aging management review.

Operating Experience

This ~~The~~ program is a new aging management program based on the program description in NUREG-1801, which in turn is based on relevant industry operating experience. As such, this program will provide reasonable assurance that effects of aging will be managed such that applicable components will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation. As additional operating experience is obtained, lessons learned can be used to adjust the program, as needed.

Commitment

License renewal commitment #13 is revised to augment the aging management program for Non-EQ Inaccessible Medium-Voltage Cables (underlined text is added):

> Implement the Non-EQ Inaccessible Medium-Voltage Cable Program as described in LRA Section B.1.17.
>
> Inspections for water accumulation in manholes containing in-scope inaccessible low-voltage and medium-voltage cables will be performed at least once every two years.
>
> Inaccessible low-voltage cables (480 V to 2 kV) that are subject to aging management review are included in this program. Inaccessible low-voltage cables will be tested for degradation of the cable insulation prior to the period of extended operation and at least once every 10 years thereafter. A proven, commercially available test will be used for detecting deterioration due to wetting of the insulation system for inaccessible low-voltage cables.

Attachment 2

Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)

License Renewal Application

License Renewal Commitment List
Revision 10

VERMONT YANKEE NUCLEAR POWER STATION
LICENSE RENEWAL COMMITMENT LIST
REVISION 10

During the development and review of the Vermont Yankee Nuclear Power Station License Renewal Application, Entergy made commitments to provide aging management programs to manage the effects of aging on structures and components during the extended period of operation. The following table lists these license renewal commitments, along with the implementation schedule and the source of the commitment.

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
1	Guidance for performing examinations of buried piping will be enhanced to specify that coating degradation and corrosion are attributes to be evaluated.	March 21, 2012	BVY 06-009	B.1.1 Audit Items 5 & 130
2	Fifteen (15) percent of the top guide locations will be inspected using enhanced visual inspection technique, EVT-1, within the first 18 years of the period of extended operation, with at least one-third of the inspections to be completed within the first 6 years and at least two-thirds within the first 12 years of the period of extended operation. Locations selected for examination will be areas that have exceeded the neutron fluence threshold.	As stated in the commitment	BVY 06-009	B.1.7 Audit Item 14
3	The Diesel Fuel Monitoring Program will be enhanced to ensure ultrasonic thickness measurement of the fuel oil storage and fire pump diesel storage (day) tank bottom surfaces will be performed every 10 years during tank cleaning and inspection.	March 21, 2012	BVY 06-009 BVY 07-018	B.1.9 and regional inspection
4	The Diesel Fuel Monitoring Program will be enhanced to specify UT measurements of the fuel oil storage and fire pump diesel storage (day) tank bottom surfaces will have acceptance criterion ≥ 60% Tnom.	March 21, 2012	BVY 06-009 BVY 07-018	B.1.9 and regional inspection

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
5	The Fatigue Monitoring Program will be modified to require periodic update of cumulative fatigue usage factors (CUFs), or to require update of CUFs if the number of accumulated cycles approaches the number assumed in the design calculation.	March 21, 2012	BVY 06-009	B.1.11
6	A computerized monitoring program (e.g., FatiguePro) will be used to directly determine cumulative fatigue usage factors (CUFs) for locations of interest.	March 21, 2012	BVY 06-009	B.1.11
7	The allowable number of effective transients will be established for monitored transients. This will allow quantitative projection of future margin.	March 21, 2012	BVY 06-009	B.1.11
8	Procedures will be enhanced to specify that fire damper frames in fire barriers will be inspected for corrosion. Acceptance criteria will be enhanced to verify no significant corrosion.	March 21, 2012	BVY 06-009	B.1.12.1 Audit Items 35, 151, 152, 153 and 159
9	Procedures will be enhanced to state that the diesel engine sub-systems (including the fuel supply line) will be observed while the pump is running. Acceptance criteria will be enhanced to verify that the diesel engine did not exhibit signs of degradation while it was running; such as fuel oil, lube oil, coolant, or exhaust gas leakage.	March 21, 2012	BVY 06-009	B.1.12.1 Audit Items 33, 150 & 155

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
10	Fire Water System Program procedures will be enhanced to specify that in accordance with NFPA 25 (2002 edition), Section 5.3.1.1.1, when sprinklers have been in place for 50 years a representative sample of sprinkler heads will be submitted to a recognized testing laboratory for field service testing. This sampling will be repeated every 10 years.	March 21, 2012	BVY 06-009	B.1.12.2
11	The Fire Water System Program will be enhanced to specify that wall thickness evaluations of fire protection piping will be performed on system components using non-intrusive techniques (e.g., volumetric testing) to identify evidence of loss of material due to corrosion. These inspections will be performed before the end of the current operating term and during the period of extended operation. Results of the initial evaluations will be used to determine the appropriate inspection interval to ensure aging effects are identified prior to loss of intended function.	March 21, 2012	BVY 06-009	B.1.12.2 Audit Items 37 & 41
12	Implement the Heat Exchanger Monitoring Program as described in LRA Section B.1.14.	March 21, 2012	BVY 06-009	B.1.14

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
13	Implement the Non-EQ Inaccessible Medium-Voltage Cable Program as described in LRA Section B.1.17. Inspections for water accumulation in manholes containing in-scope inaccessible low-voltage and medium-voltage cables will be performed at least once every two years. Inaccessible low-voltage cables (480 V to 2 kV) that are subject to aging management review are included in this program. Inaccessible low-voltage cables will be tested for degradation of the cable insulation prior to the period of extended operation and at least once every 10 years thereafter. A proven, commercially available test will be used for detecting deterioration due to wetting of the insulation system for inaccessible low-voltage cables.	March 21, 2012	BVY 06-009 BVY 10-050	B.1.17
14	Implement the Non-EQ Instrumentation Circuits Test Review Program as described in LRA Section B.1.18.	March 21, 2012	BVY 06-009	B.1.18
15	Implement the Non-EQ Insulated Cables and Connections Program as described in LRA Section B.1.19.	March 21, 2012	BVY 06-009	B.1.19
16	Implement the One-Time Inspection Program as described in LRA Section B.1.21.	March 21, 2012	BVY 06-009 BVY 07-009	B.1.21 Audit Items 239, 240, 330, 331
17	Enhance the Periodic Surveillance and Preventive Maintenance Program to assure that the effects of aging will be managed as described in LRA Section B.1.22.	March 21, 2012	BVY 06-009	B.1.22 Audit Item 377

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
18	Enhance the Reactor Vessel Surveillance Program to proceduralize the data analysis, acceptance criteria, and corrective actions described in the program description in LRA Section B.1.24.	March 21, 2012	BVY 06-009	B.1.24
19	Implement the Selective Leaching Program as described in LRA Section B.1.25.	March 21, 2012	BVY 06-009	B.1.25
20	Enhance the Structures Monitoring Program to specify that process facility crane rails and girders, condensate storage tank (CST) enclosure, CO_2 tank enclosure, N_2 tank enclosure and restraining wall, CST pipe trench, diesel generator cable trench, fuel oil pump house, service water pipe trench, man-way seals and gaskets, and hatch seals and gaskets are included in the program.	March 21, 2012	BVY 06-009	B.1.27.2 Audit Item 377
21	Guidance for performing structural examinations of wood to identify loss of material, cracking, and change in material properties will be added to the Structures Monitoring Program.	March 21, 2012	BVY 06-009	B.1.27.2
22	Guidance for performing structural examinations of elastomers (seals and gaskets) to identify cracking and change in material properties (cracking when manually flexed) will be enhanced in the Structures Monitoring Program procedure.	March 21, 2012	BVY 06-009	B.1.27.2
23	Guidance for performing structural examinations of PVC cooling tower fill to identify cracking and change in material properties will be added to the Structures Monitoring Program procedure.	March 21, 2012	BVY 06-009	B.1.27.2

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
24	System walkdown guidance documents will be enhanced to perform periodic system engineer inspections of systems in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4 (a)(1) and (a)(3). Inspections shall include areas surrounding the subject systems to identify hazards to those systems. Inspections of nearby systems that could impact the subject system will include SSCs that are in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4 (a)(2).	March 21, 2012	BVY 06-009	B.1.28 Audit Items 187, 188 & 190
25	Implement the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program as described in LRA Section B.1.29.	March 21, 2012	BVY 06-009	B.1.29
26	Procedures will be enhanced to flush the John Deere Diesel Generator cooling water system and replace the coolant and coolant conditioner every three years.	March 21, 2012	BVY 06-009	B.1.30.1 Audit Items 84 & 164

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
27	At least 2 years prior to entering the period of extended operation, for the locations identified in NUREG/CR-6260 for BWRs of the VY vintage, VY will refine our current fatigue analyses to include the effects of reactor water environment and verify that the cumulative usage factors (CUFs) are less than 1. This includes applying the appropriate Fen factors to valid CUFs determined in accordance with one of the following: 1. For locations, including NUREG/CR-6260 locations, with existing fatigue analysis valid for the period of extended operation, use the existing CUF to determine the environmentally adjusted CUF. 2. More limiting VY-specific locations with a valid CUF may be added in addition to the NUREG/CR-6260 locations. 3. Representative CUF values from other plants, adjusted to or enveloping the VY plant specific external loads may be used if demonstrated applicable to VY. 4. An analysis using an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case) may be performed to determine a valid CUF. During the period of extended operation, VY may also use one of the following options for fatigue management if ongoing monitoring indicates a potential for a condition outside the analysis bounds noted above: 1) Update and/or refine the affected analyses described above. 2) Implement an inspection program that has been reviewed and approved by the NRC (e.g., periodic nondestructive examination of the affected locations at inspection intervals to be determined by a method acceptable to the NRC). 3) Repair or replace the affected locations before exceeding a CUF of 1.0.	March 21, 2012 March 21, 2010 for performing a fatigue analysis that addresses the effects of reactor coolant environment on fatigue (in accordance with an NRC approved version of the ASME Code)	BVY-06-058	4.3.3 Audit Items 29, 107 & 318

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
28	Revise program procedures to indicate that the Instrument Air Program will maintain instrument air quality in accordance with ISA S7.3	March 21, 2012	BVY 06-009	B.1.16 Audit Item 47
29	VYNPS will perform one of the following: 1. Install core plate wedges, or, 2. Complete a plant-specific analysis to determine acceptance criteria for continued inspection of core plate hold down bolting in accordance with BWRVIP-25 and submit the inspection plan and analysis to the NRC two years prior to the period of extended operation for NRC review and approval.	March 21, 2012	BVY 06-009	B.1.7 Audit Item 9
30	Revise System Walkdown Program to specify CO2 system inspections every 6 months.	March 21, 2012	BVY 06-009	B.1.28 Audit Items 30, 141, 146 & 298
31	Revise Fire Water System Program to specify annual fire hydrant gasket inspections and flow tests.	March 21, 2012	BVY 06-009	B.1.12.2 Audit Items 39 & 40
32	Implement the Metal Enclosed Bus Program. Details are provided in a LRA Amendment 16, Attachment 3 and LRA Amendment 23, 7.	March 21, 2012	BVY 06-058 BVY 07-003 BVY 06-091	Audit Item 97

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
33	Include within the Structures Monitoring Program provisions that will ensure an engineering evaluation is made on a periodic basis (at least once every five years) of groundwater samples to assess aggressiveness of groundwater to concrete. Samples will be monitored for sulfates, pH and chlorides.	March 21, 2012	BVY 06-009	B.1.27 Audit Item 77 RAI 3.5-7
34	Implement the Bolting Integrity Program. Details are provided in a LRA Amendment 16, Attachment 2 and LRA Amendment 23, Attachment 5.	March 21, 2012	BVY 06-058 BVY 07-003 BVY 06-091	Audit Items 198, 216, 218, 237, 331 & 333
35	Provide within the System Walkdown Training Program a process to document biennial refresher training of Engineers to demonstrate inclusion of the methodology for aging management of plant equipment as described in EPRI Aging Assessment Field Guide or comparable instructional guide.	March 21, 2012	BVY 06-058	Audit Item 384
36	If technology to inspect the hidden jet pump thermal sleeve and core spray thermal sleeve welds has not been developed and approved by the NRC at least two years prior to the period of extended operation, VYNPS will initiate plant-specific action to resolve this issue. That plant specific action may be justification that the welds do not require inspection.	March 21, 2010	BVY06-058	Audit Item 12
37	Continue inspections in accordance with the Steam Dryer Monitoring Program, Revision 3 in the event that the BWRVIP-139 is not approved prior to the period of extended operation.	March 21, 2010	BVY 06-079	Audit Item 204

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
38	The BWRVIP-116 report which was approved by the Staff will be implemented at VYNPS with the conditions documented in Sections 3 and 4 of the Staff's final SE dated March 1, 2006, for the BWRVIP-116 report.	March 21, 2012	BVY 06-088	Response to RAI B.1.24-1
39	If the VYNPS standby capsule is removed form the reactor vessel without the intent to test it, the capsule will be stored in a manner which maintains it in a condition which would permit its future use, including during the period of extended operation, if necessary.	March 21, 2012	BVY 06-088	Response to RAI B.1.24-2
40	This Commitment has been deleted and replaced with Commitment 43.	N/A	BVY 07-018	N/A
41	This Commitment has been deleted and replaced with Commitment 43.	N/A	BVY 07-018	N/A
42	Implement the Bolted Cable Connections Program. Details are provided in LRA Amendment 23, attachment 7.	March 21, 2012	BVY 07-003 BVY 07-018	Response to: RAI 3.6.2.2-N-01 LRA Sections: 3.6.2.1 A.2.1.39 B.1.33 Table 3.6.1 Table 3.6.2-1
43	Establish and implement a program that will require testing of the two 13.8 kV cables from the two Vernon Hydro Station 13.8 kV switchgear buses to the 13.8 kV / 69 kV step up transformers before the period of extended operation and at least once every 10 years after the initial test.	March 21, 2012	BVY 07-009 BVY 07-018	Am. 24 Response to: RAIs 3.6.2.2-N-08-2 3.6.2.2-N-08-4

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
44	Guidance for performing examinations of buried piping will be revised to include the following. "A focused inspection will be performed within the first 10 years of the period of extended operation, unless an opportunistic inspection (or an inspection via a method that allows an assessment of pipe condition without excavation) occurs within this ten-year period."	March 21, 2012	BVY 07-018	Regional inspection
45	Enhance the Service Water Integrity Program to require a periodic visual inspection of the RHRSW pump motor cooling coil internal surface for loss of material.	March 21, 2012	BVY 07-018	Regional inspection
46	Enhance the Diesel Fuel Monitoring Program to specify that fuel oil in the fire pump diesel storage (day) tank will be analyzed according to ASTM D975-02 and for particulates per ASTM D2276. Also, fuel oil in the John Deere diesel storage tank will be analyzed for particulates per ASTM D2276.	March 21, 2012	BVY 07-018	Regional inspection
47	Enhance the Diesel Fuel Monitoring Program to specify that fuel oil in the common portable fuel oil storage tank will be analyzed according to ASTM D975-02, per ASTM D2276 for particulates, and ASTM D1796 for water and sediment.	March 21, 2012	BVY 07-018	Regional inspection
48	Perform an internal inspection of the underground Service Water piping before entering the period of extended operation.	March 21, 2012	BVY 07-018	Regional inspection
49	Revise station procedures to specify fire hydrant hose testing, inspection, and replacement, if necessary, in accordance with NFPA code specifications for fire hydrant hoses.	March 21, 2012	BVY 07-009	Audit Item 38

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
50	During the period of extended operation, review the Vernon Dam owner FERC required report(s) at a minimum of every five years to confirm that the Vernon Dam owner is performing the required FERC inspections. Document deficiencies in the Entergy Corrective Actions Program and evaluate operability as described in BVY 96-043 and BVY 97-043 if it is determined that the required inspections are not being performed.	March 21, 2012	BVY 06-009 BVY 07-047	RAI 3.6.2.2.N-08-1
51	Entergy will perform an evaluation of operating experience at extended power uprate (EPU) levels prior to the period of extended operation to ensure that operating experience at EPU levels is properly addressed by the aging management programs. The evaluation will include Vermont Yankee (VY) and other BWR plants operating at EPU levels.	March 21, 2012	BVY 08-008	N/A