



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

Michael J. Colomb
Site Vice President

This letter contains ~~Security-Related Information~~
Attachments 1, 4 and 6 are withheld from public disclosure under 10CFR2.390

BVY 11-023

April 4, 2011

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

SUBJECT: Technical Specifications Proposed Change 292, Supplement 2
Response to Request for Additional Information (RAI) and Revision to the
Vermont Yankee Cyber Security Plan
Docket No. 50-271
License No. DPR-28

REFERENCES:

1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Technical Specification Proposed Change No. 292 License Amendment Withdrawal and Request – Cyber Security Plan Vermont Yankee Nuclear Power Station," BVY 10-036, dated July 16, 2010
2. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Revision of Commitment to Supplement the Vermont Yankee Cyber Security Plan Regarding Balance-of-Plant Systems," BVY 10-064, dated November 30, 2010
3. Letter, Richard P. Correia (USNRC) to Chris Earls (NEI) Concerning Scope of Systems Subject to the NRC's Cyber Security Rule, dated January 5, 2011
4. Letter, Entergy Nuclear Operations to USNRC, "Technical Specification Proposed Change No. 292, Supplement 1 Response to Request for Additional Information on the VY Cyber Security Plan," BVY 11-011, dated February 15, 2011
5. Letter, USNRC to Entergy Nuclear Operations, Inc., "Request for Additional Information to Support the Review of the Vermont Yankee Nuclear Power Station Cyber Security Plan (TAC NO. ME4296)," NVY 11-019, dated March 3, 2011
6. Letter, Chris Earls (NEI) to Richard P. Correia (USNRC), "Clarification to NEI 08-09, Revision 6 Regarding Records Retention," dated February 28, 2011
7. Letter, Chris Earls (NEI) to Richard P. Correia (USNRC), "Template for the Cyber Security Plan Implementation Schedule," dated February 28, 2011

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8. Letter, Richard P. Correia (USNRC) to Chris Earls (NEI), "Cyber Security Plan Generic Request for Additional Information on Records Retention," dated March 1, 2011
9. Letter, Richard P. Correia (USNRC) to Chris Earls (NEI), "Template for the Cyber Security Plan Implementation Schedule," dated March 1, 2011

Dear Sir or Madam:

In Reference 1, Entergy Operations, Inc. (Entergy) submitted a request for an amendment to the operating license for Vermont Yankee (VY) requesting NRC approval of the VY Cyber Security Plan. In accordance with Reference 4, Entergy is revising Section 2.1 "Scope and Purpose" and Section 4.3, "Defense-In-Depth Protective Strategies," to address clarifications with respect to data diodes/air gaps and emergency plan/preparedness as described in the request for additional information (RAI) responses. Subsequent to the submittal of these RAI responses, the NRC issued additional generic RAIs on the VY Cyber Security Plan via Reference 5. Entergy's response to these RAIs is provided in Attachment 1.

Attachment 2 contains proposed marked-up operating license page for the Security Plan license condition to include the VY Cyber Security Plan. Attachment 3 contains the proposed re-typed operating license page. The marked-up page in Attachment 2 and the revised page in Attachment 3 replace, in their entirety, the page previously submitted in Reference 1.

Attachment 4 contains an updated cyber security plan implementation schedule and Attachment 5 provides an updated list of regulatory commitments. These replace, in their entirety, the implementation schedule and commitments previously submitted in Reference 1.

Attachment 6 provides a revised copy of the VY Cyber Security Plan, Revision 0, which incorporates changes to Sections 2.1 "Scope and Purpose," 4.3 "Defense-In-Depth Protective Strategies," and 4.13 "Document Control and Records Retention and Handling." No other technical changes have been made to the VY Cyber Security Plan. The enclosed VY Cyber Security Plan replaces, in its entirety, the VY Cyber Security Plan previously submitted in Reference 1. The changes discussed in this letter are clarifying or administrative and do not impact the conclusions of the no significant hazards consideration determination previously provided in Reference 1.

Entergy requests that Attachments 1, 4, and 6 which contain security-sensitive information (SSI), be withheld from public disclosure in accordance with 10 CFR 2.390.

The revised commitments contained in this submittal are summarized in Attachment 5. Should you have any questions concerning this letter, or require additional information, please contact Bob Wanczyk at 802-415-3366.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 4, 2011.

Sincerely,

A handwritten signature in black ink, appearing to be 'MJC/JMD', written over a horizontal line.

MJC/JMD

Attachments: 1. Response to Request for Additional Information (contains SSI)
2. Marked up Facility Operating License Page
3. Re-typed Facility Operating License Page
4. Cyber Security Plan Implementation Schedule (contains SSI)
5. List of Regulatory Commitments
6. Revised Vermont Yankee Cyber Security Plan (contains SSI)

cc: William M. Dean
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
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King of Prussia, PA 19406-1415

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

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

Ms. Elizabeth Miller
Commissioner (w/o Attachments)
Vermont Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05620-2601

Attachment 2

Proposed Change 292, Supplement 2

Marked up Facility Operating License Page

Safety Analysis Report for the facility and as approved in the SER dated January 13, 1978, and supplemental SERs, dated 9/12/79, 2/20/80, 4/15/80, 7/3/80, 10/24/80, 11/10/81, 1/13/83, 7/24/84, 3/25/86, 12/1/86, 12/8/89, 11/29/90, 8/30/95, 3/23/97, 6/9/97, 8/12/97, 3/6/98, 3/31/98, 9/2/98, and 2/24/99, subject to the following provisions:

Entergy Nuclear Operations, Inc. may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

G. Security Plan

Entergy Nuclear Operations, Inc. shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans¹, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Vermont Yankee Nuclear Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," submitted by letter dated October 18, 2004, as supplemented by letter dated May 16, 2006.

INSERT

H. This paragraph deleted by Amendment No. 107, 8/25/88.

I. This paragraph deleted by Amendment No. 131, 10/7/91.

J. License Transfer Conditions

On the closing date of the transfer of Vermont Yankee Nuclear Power Station (Vermont Yankee), Entergy Nuclear Vermont Yankee, LLC shall obtain from Vermont Yankee Nuclear Power Corporation all of the accumulated decommissioning trust funds for the facility, and ensure the deposit of such funds into a decommissioning trust for Vermont Yankee established by Entergy Nuclear Vermont Yankee, LLC. If the amount of such funds does not meet or exceed the minimum amount required for the facility pursuant to 10 CFR 50.75, Entergy Nuclear Vermont Yankee, LLC shall at such time deposit additional funds into the trust and/or obtain a parent company guarantee (to be updated annually) and/or obtain a surety pursuant to 10 CFR 50.75(e)(1)(iii) in a form acceptable to the NRC and in an amount or amounts which, when combined with the decommissioning trust funds for the facility that have been obtained and deposited as required above, equals or

Entergy Nuclear Operations, Inc. shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved Vermont Yankee Cyber Security Plan pursuant to 10 CFR 73.55(c)(6) and 10 CFR 73.54 (74 FR 13970) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

Attachment 3

Proposed Change 292, Supplement 2

Re-typed Facility Operating License Page

Safety Analysis Report for the facility and as approved in the SER dated January 13, 1978, and supplemental SERs, dated 9/12/79, 2/20/80, 4/15/80, 7/3/80, 10/24/80, 11/10/81, 1/13/83, 7/24/84, 3/25/86, 12/1/86, 12/8/89, 11/29/90, 8/30/95, 3/23/97, 6/9/97, 8/12/97, 3/6/98, 3/31/98, 9/2/98, and 2/24/99, subject to the following provisions:

Entergy Nuclear Operations, Inc. may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

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Entergy Nuclear Operations, Inc. shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans¹, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Vermont Yankee Nuclear Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," submitted by letter dated October 18, 2004, as supplemented by letter dated May 16, 2006.

Entergy Nuclear Operations, Inc. shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved Vermont Yankee Cyber Security Plan pursuant to 19 CFR 73.55(c)(6) and 10 CFR 73.54 (74 FR 13970) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

H. This paragraph deleted by Amendment No. 107, 8/25/88.

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J. License Transfer Conditions

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¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

Attachment 5

Proposed Change 292, Supplement 2

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

| COMMITMENT | TYPE (Check One) | | SCHEDULED COMPLETION DATE (If Required) |
|--|------------------------|--------------------------|--|
| | ONE- TIME ACTION | CONTINUING COMPLIANCE | |
| Entergy will implement milestones 1 through 7 described in Attachment 4 to BVY 11-023. | X | | December 31, 2012 |
| Full implementation of VY Cyber Security Plan for all safety, security, and emergency preparedness functions will be achieved. | X | | December 15, 2014 |