

**Entergy Nuclear Operations, Inc.** 

Vermont Yankee 320 Governor Hunt Rd Vernon, VT 05354 Tel 802 257 7711

Michael J. Colomb Site Vice President

BVY 11-042

May 16, 2011

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

SUBJECT:

Technical Specifications Proposed Change No. 293, Supplement 1 Revised Reactor Vessel Pressure-Temperature Limitation Curves

Vermont Yankee Nuclear Power Station

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

REFERENCE: 1.

Letter, VYNPC to USNRC, "Revised Reactor Pressure Vessel Pressure-

Temperature Limitation Curves," BVY 10-071, dated 12/21/10

## Dear Sir or Madam:

Per discussion with your staff, we are providing additional clarifying information that was requested as part of the review of a request for a License Amendment (Reference 1) for the Vermont Yankee Nuclear Power Station (VYNPS).

In the proposed change submittal (Reference 1) two fluence figures are discussed - 5.16x10<sup>17</sup> n/cm<sup>2</sup> and 5.39x10<sup>17</sup> n/cm<sup>2</sup>. The 5.16x10<sup>17</sup> n/cm<sup>2</sup> value was computed based on actual plant operating history data through 2002 and a projected 93 percent capacity factor for the period 2003 through March 2032. The computed effective full power years (EFPY) for that fluence value are 51.6 EFPY. The 7.943 x 10<sup>8</sup> MWH(t) power generation value is based on that fluence value. VYNPS utilizes MWH(t), not EFPY, when tracking plant history for this Technical Specification.

As part of the License Renewal Application (LRA) process the expectation was to present a value for 54 EFPY in the LRA; this derives from 60 years time at an average 90 percent capacity factor. As stated in LRA Section 4.2.1, the 5.16x10<sup>17</sup> n/cm² value was extrapolated to 5.39x10<sup>17</sup> n/cm² at 54 EFPY. The LRA evaluations and the associated USNRC Safety Evaluation Report utilized this figure.

Our Proposed Change (Reference 1) requests a revised validity for the VYNPS Reactor Vessel Pressure-Temperature Limit Curves of up to 7.943 x 10<sup>8</sup> MWH(t) power generation value and is based upon a calculated 5.16x10<sup>17</sup> n/cm<sup>2</sup> fluence value.

This supplemental information does not affect or alter the content and scope of our original submittal, nor does it alter the scope and conclusion of no significant hazards determined in our original submittal.

ADOI

There are no new regulatory commitments being made in this submittal.

If you have any questions on this transmittal, please contact Mr. Robert Wanczyk at 802-451-3166.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 13, 2011.

Sincerely,

[MJC/JTM]

cc: Mr. William W. Dean Regional Administrator, Region 1 U.S. Nuclear Regulatory Commission 475 Allendale Road 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 Mail Stop O8C2A Washington, DC 20555

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

Ms. Elizabeth Miller, Commissioner VT Department of Public Service 112 State Street – Drawer 20 Montpelier, Vermont 05620-2601