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BVY 11-026

May 19, 2011

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

SUBJECT: Notification of Revised Regulatory Commitment  
Vermont Yankee Nuclear Power Station  
Docket No. 50-271  
License No. DPR-28

REFERENCES: 1. Letter, Entergy to USNRC, "License Renewal Application," BVY 06-009, dated January 25, 2006  
2. NUREG-1907, Volume 2, "Safety Evaluation Report Related to the License Renewal of Vermont Yankee Nuclear Power Station," dated May 2008  
3. NEI 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999

Dear Sir or Madam:

In Reference 1, Vermont Yankee Nuclear Power Station (VYNPS) made commitments related to aging management programs (AMPs) to manage the aging effects of structures and components during the period of extended operation (PEO). The following summarizes a change to a VYNPS commitment made in Reference 1.

The Fatigue Monitoring AMP tracks the number of critical thermal and pressure transients for selected reactor coolant system components. The program ensures the validity of analyses that explicitly assumed a specified number of thermal and pressure fatigue transients by assuring that the actual effective number of transients is not exceeded. In Reference 1, VYNPS committed (Commitment No. 6) to use a computerized monitoring program (e.g., FatiguePro) to directly determine cumulative fatigue usage factors (CUFs) for locations of interest. The NRC staff found the VYNPS Fatigue Monitoring AMP to be adequate in Reference 2.

VYNPS currently uses a manual counting method for thermal and pressure transient cycles. This is not a labor intensive process since there has been six or less total transient cycles per plant operating cycle. For VYNPS, the predicted number of transient cycles at the end of the PEO is predicted to be less than 60% of the design number. This prediction was reached by taking the historical data up to the time of the preparation of Reference 1 and extrapolating it to 60 years of operation.

Based on the predicted number of transient cycles being significantly less than the design number of cycles and the relative ease of counting and tracking cycles, VYNPS will not use a computerized monitoring program for directly determining CUFs during the PEO. VYNPS will

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continue to use manual transient cycle counting to track and compare accumulated cycles against allowable values to determine if cumulative usage factors are required to be updated during the PEO.

No NRC action is requested on this issue. This letter serves to update the docket relative to this prior commitment. This change in commitment continues to provide adequate assurance of the ability to track the number of critical thermal and pressure transients for selected reactor coolant system components.

This commitment change was evaluated in accordance with the VYNPS procedure for implementing the industry guidance contained in Reference 3 and determined to not impact nuclear safety.

Attachment 1 of this letter contains the revised license renewal commitment No. 6.

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

Sincerely,



[MJC/PLC]

Attachments: 1. List of Regulatory Commitments

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

Mr. James S. Kim, Project Manager  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
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USNRC Resident Inspector

Ms. Elizabeth Miller, Commissioner  
VT Department of Public Service  
112 State Street – Drawer 20  
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**Attachment 1**

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

**List of Regulatory Commitments**

### List of Regulatory Commitments

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Manual cycle counting will be used to track and compare accumulated cycles against allowable values to determine if cumulative usage factors are required to be updated.		x	Not applicable