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BVY 12-067

November 20, 2012

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

SUBJECT:            Technical Specifications Proposed Change 300, Supplement 1  
                         Response to Request for Additional Information  
                         Vermont Yankee Nuclear Power Station  
                         Docket No. 50-271  
                         License No. DPR-28

REFERENCE:        1.        Letter, Entergy Nuclear Operations, Inc. to USNRC, "Proposed  
                         Change No. 300 Renewed Facility Operating License Condition  
                         3.P and 3.Q Changes," BVY 12-015, dated March 5, 2012

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (Entergy) submitted a request for an amendment to the Vermont Yankee (VY) renewed facility operating license (RFOL) to revise license conditions 3.P and 3.Q related to license renewal commitments.

Attachment 1 to this submittal provides Entergy's response to questions discussed with NRC staff during a teleconference held on October 9, 2012 and received on October 10, 2012. Attachment 2 contains a revised markup of the RFOL pages and Attachment 3 contains the retyped RFOL pages.

This supplement to the original license amendment request does not change the scope or conclusions in the original application, nor does it change Entergy's determination of no significant hazards consideration.

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

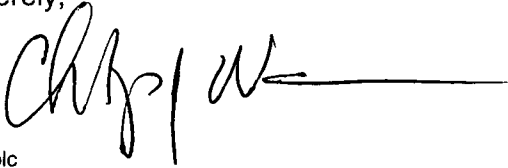
Should you have any questions concerning this letter or require additional information, please contact Robert Wanczyk at 802-451-3166.

A117  
MRK

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

Executed on November 20, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris W.", followed by a horizontal line extending to the right.

CJW/plc

- Attachments:
1. Response to Request for Additional Information
  2. Markup of Current Renewed Facility Operating License Page
  3. Retyped Renewed Facility Operating License Page

cc: Mr. William M. Dean  
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U.S. Nuclear Regulatory Commission  
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Ms. Elizabeth Miller  
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Attachment 1

Proposed Change 300, Supplement 1  
Response to Request for Additional Information

Vermont Yankee Nuclear Power Station  
Proposed Change 300, Supplement 1  
Response to Request for Additional Information

**Background**

By letter dated March 5, 2012, the licensee proposed to modify the VY Renewed Facility Operating License Condition (RFOLC) 3.P to clarify that the programs and activities described in the Updated Final Safety Analysis Report (UFSAR) supplement submitted pursuant to 10 CFR 54.21(d), as revised during the license renewal application process, may be changed without prior NRC approval provided the requirements of 10 CFR 50.59 have been previously satisfied. Additionally, the licensee proposed to revise the RFOLC 3.Q to clarify that the programs and activities, identified in Appendix A of Supplement 2 to NUREG-1907 and the UFSAR supplement, to be completed before the period of extended operation are completed on schedule, and the NRC is to be notified upon completion of implementation of these activities. Also, a new regulatory commitment is included in this letter to incorporate the Appendix A list of commitments for license renewal from Supplement 2 to NUREG-1907 into the UFSAR supplement.

**Issue**

At the time the renewed operating license for Vermont Yankee was issued, the commitments listed in Appendix A of the license renewal safety evaluation report for Vermont Yankee were not incorporated as part of the UFSAR supplement. Also, the conditions that were added as part of the renewed operating license for Vermont Yankee did not require the commitments for license renewal be incorporated as part of the UFSAR. The specific wording of RFOLC 3.Q states, in part:

[The licensee] shall complete these activities in accordance with Appendix A of Supplement 2 to NUREG-1907, "Safety Evaluation Report Related to the License Renewal of Vermont Yankee Nuclear Power Station," issued March 2011 (excluding Commitment No. 37, which is superseded by the steam dryer license condition).

This wording escalates each regulatory commitment in the Appendix A list of commitments from the safety evaluation report to obligations, i.e. license conditions. Regulatory commitments that are referenced in the license condition for license renewal, but not incorporated as part of the UFSAR, are treated as license conditions. License conditions require NRC approval and are processed in accordance with the requirements in 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit." License conditions require a license amendment request which includes a technical evaluation that justifies the modification of the license condition.

The NRC staff recognizes that the licensee has submitted a license amendment request which provides a technical evaluation to revise RFOLC 3.P and 3.Q. However, the submittal of a regulatory commitment is not sufficient for

**incorporating the Appendix A list of commitments from the license renewal safety evaluation report which were escalated to license conditions into the UFSAR to be managed using 10 CFR 50.59. Additionally, the license amendment request does not provide a technical evaluation or sufficient information for the NRC staff to evaluate the proposal to incorporate the Appendix A list of commitments from the license renewal safety evaluation report into the UFSAR Supplement. Specifically, the licensee does not provide technical justifications for why the commitments in Appendix A of the license renewal safety evaluation (which are license conditions) can be managed using the 10 CFR 50.59 process.**

### **RAI**

**Please provide a technical evaluation that justifies why the Appendix A list of commitments from the license renewal safety evaluation report, which were elevated to license conditions, can be incorporated as part of the UFSAR and managed using the 10 CFR 50.59 process.**

Response:

This response focuses on the Vermont Yankee (VY) UFSAR, the intent of renewed facility operating license condition 3.Q, the NRC position on escalation of commitments into obligations and precedent. This response also includes revised markups of license conditions 3.P and 3.Q. Table 1 provides a status for each of the license renewal commitments listed in Appendix A of NUREG-1907, Supplement 2, as well as additional technical justification, where appropriate, and a conclusion as to why each commitment need not be controlled as an obligation.

### **UFSAR**

The Appendix A list of license renewal commitments (excluding commitment no. 37 and including commitment no. 55) was incorporated into the UFSAR License Renewal Application (LRA) supplement, which was subsequently incorporated in Revision 25 of the VY UFSAR. Revision 25 was transmitted to the NRC in Reference 1. These actions satisfy the commitment made in Reference 2 and the requirements of current renewed facility operating license condition 3.P, respectively.

Managing the Appendix A commitments by inclusion in the UFSAR and control under 10 CFR 50.59 is consistent with the NRC's license renewal rules. 10 CFR 54.21(d) provides that the FSAR supplement should contain a summary of the programs and activities for managing the effects of aging, and in promulgating the current license renewal rules, the Commission explained that "[t]he regulatory process will continue to ensure that proposed changes to programs and activities that may affect descriptions in the FSAR will receive adequate review by the licensee and, if appropriate, by the NRC." (60 FR 22483, published May 8, 1995) Further, the proposed control of these commitments through inclusion in the FSAR is consistent with current NRC practice, as reflected in conditions specified in the recently issued renewed licenses for the Columbia Generating Station and Pilgrim Station. See Renewed License NPF-21, ¶ 2.C(34); Renewed License DPR-35, ¶ 7.

Changes to the UFSAR are controlled under 10 CFR 50.59. 10 CFR 50.59 contains provisions that require a licensee to obtain a license amendment under 10 CFR 50.90 if

the change meets any of the criteria of 10 CFR 50.59(c)(2). Additionally, any changes to procedures and programs that implement license renewal commitments are controlled by 10 CFR 50 Appendix B. These regulatory controls ensure that a documented basis for licensee-initiated changes in the licensing basis exists and that NRC review and approval is obtained prior to the implementation if changes to the licensing basis raise unreviewed safety questions or involve changes to the technical specifications. The UFSAR is periodically updated to reflect such changes under the provisions of 10 CFR 50.71(e).

#### Intent of License Condition

Based on discussion with NRC regional staff, VY believes that license condition 3.Q was intended to ensure that those programmatic or procedural enhancements that VY had committed to implement before the start of the period of extended operation (PEO) were completed on this schedule, and was not intended to preclude subsequent changes to these aging management programs and activities from being made under the control of 10 CFR 50.59. This understanding is supported by a note in Table 3.0-1, FSAR Supplement for Aging Management of Applicable Systems, of NUREG-1800, Revision 2, which states:

An applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should verify that the applicant has identified and committed in the license renewal application to any future aging management activities to be completed before the period of extended operation. **The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.** [emphasis added]

This note is silent on whether the commitments must be implemented as described in the safety evaluation report, meaning that only the commitment implementation date is subject to the obligation imposed by the license condition. The commitment content would be subject to revision under the appropriate licensee controlled process. As reported in Reference 5 and shown in Table 1 below, all of the VY license renewal commitments have either been completed or implemented.

VY's understanding of the intent of license condition 3.Q is also consistent with the conditions that the NRC has included in renewed licenses after the meaning of the VY license condition was questioned. For example, the license conditions included in the renewed licenses for both the Columbia Generating Station and the Pilgrim Station explicitly allow changes to SER-listed license renewal commitments under the control of 10 CFR 50.59.

#### NRC Position on Escalation of Commitments

In a memorandum titled "Assessment of Regulatory Processes that Utilize Regulatory Commitments," dated November 26, 2008, the Office of Nuclear Reactor Regulation, Division of Operating Reactors, provided an assessment of the regulatory processes that utilize regulatory commitments to determine whether the use of commitments in licensing activities should be reduced or eliminated and replaced with enforceable processes, such as license conditions. The assessment stated:

Consistent with the guidance in SECY-98-224, "Staff and Industry Activities Pertaining to the Management of Commitments Made by Power Reactor Licensees to the NRC," and the definition of "obligation" in NRR Office Instruction LIC-100, "Control of Licensing Bases for Operating Reactors," escalating a licensee commitment into a legally binding regulatory requirement should be reserved for matters that warrant: (1) inclusion in the technical specifications based on the criteria in 10 CFR 50.36; or (2) inclusion in the license based on determination by the NRC staff that the issue is of high safety or regulatory significance.

The Appendix A list of commitments does not warrant inclusion in the technical specifications based on the criteria in 10 CFR 50.36 because the list of commitments was developed, reviewed and approved under the 10 CFR 54 rules and regulations for renewal of operating licenses. 10 CFR 54.22 requires that an application for license renewal include any technical specification changes or additions necessary to manage the effects of aging during the PEO. As reported in Appendix D of the VY LRA, "[a] review of the information in this License Renewal Application and the Vermont Yankee Nuclear Power Station Technical Specifications determined that no changes to the Technical Specifications are required." Additionally, none of the amendments or supplements to the LRA identified a need to change the VY TS as a result of new or revised license renewal commitments submitted therein.

The Appendix A list of commitments does not warrant inclusion in the license based on determination by the NRC staff that the issue (license renewal activities) is of high safety or regulatory significance. This statement is supported by the 10 CFR 54 statements of consideration. In 56 FR 64943, published 12/13/91, the staff noted:

The first principle is that, with the exception of age-related degradation unique to license renewal and possibly some few other issues related to safety only during extended operation, the regulatory process is adequate to ensure that the licensing bases of all currently operating plants provide and maintain an acceptable level of safety for operation so that operation will not be inimical to public health and safety or common defense and security. Continuing this regulatory process in the future will ensure that this principle remains valid during any renewal term if the regulatory process is modified to include age-related degradation unique to license renewal. Moreover, consideration of the range of issues relevant only to extended operation has led the Commission to conclude that there is likely only one real issue generally applicable to all plants-age-related degradation. The renewal rule focuses the Commission's review on this one safety issue [...]

The second and equally important principle is that each plant's current licensing basis must be maintained during the renewal term, in part through a program of age-related degradation management for systems, structures, and components that are important to license renewal as defined in the final rule.

In sum, the Commission's regulatory processes provide reasonable assurance that the discipline of a formal license renewal review against either the full range of current safety requirements or the requirements on common defense and security would not add significantly to safety or common defense and security

and is not needed to ensure that continued operation during the renewal term is not inimical to the public health and safety or the common defense and security.

It can be concluded from the discussion above that the NRC staff would not consider the license renewal activities to be of such high safety or regulatory significance that any licensee commitments associated with license renewal activities would need to be elevated to the level of an obligation.

NRR Office Instruction LIC-105, Revision 4, "Managing Regulatory Commitments Made by Licensees to the NRC" states that "[t]herefore, if the NRC staff needs to rely on a regulatory commitment in an SE, then the staff must escalate the commitment to an obligation, or incorporate it into a mandated licensing basis document." Accordingly, since the NRC staff relied on the license renewal commitments in the safety evaluations (References 3 and 4), the incorporation of the list of license renewal commitments into the UFSAR (a mandated licensing basis document) is an acceptable method for escalating the commitment.

#### Precedent

The renewed facility operating licenses for Pilgrim Nuclear Power Station (Renewed License No. DPR-35) and Columbia Generating Station (Renewed License No. NPF-21) contain license condition wording similar to that which VY is proposing to adopt.

#### Revised License Condition Markups

Attachment 2 contains a revised markup of VY renewed facility operating license conditions 3.P and 3.Q. These revised markups replace in their entirety the markups provided in the March 5, 2012 letter proposing to modify the license conditions.

The license condition 3.P markup is similar to the equivalent license conditions in the Pilgrim and Columbia Station operating licenses and would explicitly list which commitments from the Appendix A list are required to be included in the UFSAR supplement. The proposed markup also explicitly states that VY may make changes to the program and activities described in the UFSAR supplement and lists which commitments from the Appendix A list are allowed to be changed under the provisions of 10 CFR 50.59. As described in Table 1 below, the license renewal commitments that have been completed and require no additional action during the PEO are excluded from the markup, although they are included in the list of commitments incorporated into the UFSAR, as reported in Reference 1.

The license condition 3.Q markup removes the obligation to complete the license renewal activities during the period of extended operation in accordance with the Appendix A list of commitments. By doing this, the scope of the license condition is limited to ensuring that the license renewal commitments and programs are implemented prior to the PEO. Once these activities have been completed and the NRC notified in writing, then the required actions of this license condition have been satisfied with no continuing obligation. Since VY has notified the NRC of the completion of these activities (Reference 5) and the NRC has performed an inspection (Reference 7), then this license condition would be satisfied and no further action would be required by VY. The proposed changes to license condition 3.P will provide reasonable assurance that



the activities described in the list of Appendix A commitments and the UFSAR supplement will adequately manage the effects of aging during the PEO.

### Summary

The preceding provides technical evaluation that justifies why the Appendix A list of commitments from the license renewal safety evaluation report, which were elevated to license conditions, can be incorporated as part of the UFSAR and managed using the 10 CFR 50.59 process.

It is acceptable for VY to incorporate the Appendix A list of commitments into the UFSAR and manage them using the 10 CFR 50.59 process, and not as obligations under a license condition, because:

- The list of commitments has been incorporated into the VY UFSAR.
- The incorporation of commitments into a mandated LBD is an acceptable method for treating a commitment that was relied upon in a safety evaluation.
- The commitments do not meet the 10 CFR 50.36 criteria for inclusion in the technical specifications.
- The commitments do not have high regulatory or safety significance.
- Consistent with NUREG-1800, the intention of a license condition governing license renewal commitments is to ensure that the commitments are implemented or completed as scheduled.
- The commitments have either been completed or implemented, with exception to the Appendix A wording as noted in Reference 5 and Table 1.

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
1	Guidance for performing examinations of buried piping will be enhanced to specify that coating degradation and corrosion are attributes to be evaluated.	Implemented	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1,2</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
4	The Diesel Fuel Monitoring Program will be enhanced to specify that UT measurements of the fuel oil storage tank bottom surface will have acceptance criterion in accordance with American Petroleum Institute standard API 653 and UT measurements of the fire pump diesel storage (day) tank bottom surface will have acceptance criterion in accordance with Steel Tank Institute standard STI SP001.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
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ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
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.	Implemented	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
6	A computerized monitoring program (e.g., FatiguePro) will be used to directly determine cumulative fatigue usage factors (CUFs) for locations of interest.	Implemented <sup>1,2,3</sup>	<p>A commitment change was completed to revise the commitment to read as:</p> <p><i>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.</i></p> <p>Since the commitment change was completed in January 2011, the commitment was not an obligation and the 50.90 process was not required to be used since the renewed facility operating license was not issued until March 2011. An evaluation of this commitment change by the NRC is documented in References 6 and 7.</p>	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
7	The allowable number of effective transients will be established for monitored transients. This will allow quantitative projection of future margin.	Implemented	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

**TABLE 1**  
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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.	Implemented <sup>1</sup>	Technical Specifications pertaining to elements of the Fire Protection Program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	Technical Specifications pertaining to elements of the Fire Protection Program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	Technical Specifications pertaining to elements of the Fire Protection Program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	Technical Specifications pertaining to elements of the Fire Protection Program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

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ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
12	Implement the Heat Exchanger Monitoring Program as described in LRA Section B.1.14.	Implemented <sup>1,3</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
13	<p>Implement the Non-EQ Inaccessible Medium-Voltage Cable Program as described in LRA Section B.1.17.</p> <p>Inspections for water accumulation in manholes containing inaccessible low-voltage and medium-voltage cables with a license renewal intended function will be performed at least once every year. Additional condition-based inspections of these manholes will be performed based on: a) potentially high water table conditions, as indicated by high river level, and b) after periods of heavy rain. The inspection results are expected to indicate whether the inspection frequency should be modified.</p> <p>Inaccessible low-voltage cables (400 V to 2 kV) with a license renewal intended function 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 six 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.</p>	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
14	Implement the Non-EQ Instrumentation Circuits Test Review Program as described in LRA Section B.1.18.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

**TABLE 1  
VERMONT YANKEE NUCLEAR POWER STATION  
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ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
15	Implement the Non-EQ Insulated Cables and Connections Program as described in LRA Section B.1.19.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
16	Implement the One-Time Inspection Program as described in LRA Section B.1.21.	Implemented <sup>1,2</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
19	Implement the Selective Leaching Program as described in LRA Section B.1.25.	Implemented <sup>1,2</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

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ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
20	Enhance the Structures Monitoring Program to specify that process facility crane rails and girders, condensate storage tank (CST) enclosure, CO <sub>2</sub> tank enclosure, N <sub>2</sub> 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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>3</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>3</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

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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).	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
25	Implement the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program as described in LRA Section B.1.29.	Implemented <sup>1,3</sup>	There are no components at VY that meet the criteria for inclusion in this program.  Commitment implementation consisted of adding administrative references to the VY Reactor Vessel Internals program.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.



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**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
27	<p>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:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. More limiting VY-specific locations with a valid CUF may be added in addition to the NUREG/CR-6260 locations.</li> <li>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.</li> <li>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.</li> </ol> <p>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:</p> <ol style="list-style-type: none"> <li>1) Update and/or refine the affected analyses described above.</li> <li>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).</li> <li>3) Repair or replace the affected locations before exceeding a CUF of 1.0.</li> </ol>	Complete	<p>Option 1 of the commitment is complete. The NRC review of the commitment implementation is documented in Section 4.3.3 of NUREG-1907, Safety Evaluation Report Related to the License Renewal of Vermont Yankee Nuclear Power Station.</p> <p>There are no further actions required to be taken for this commitment during the PEO.</p>	<p>Since the commitment has been completed, relocating it to a licensee-controlled document is administrative in nature.</p>

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
28	Revise program procedures to indicate that the Instrument Air Program will maintain instrument air quality in accordance with ISA S7.3	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
29	<p>VYNPS will perform one of the following:</p> <ol style="list-style-type: none"> <li>1. Install core plate wedges, or,</li> <li>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 one year prior to the period of extended operation for NRC review and approval.</li> </ol>	Complete <sup>1</sup>	<p>Option 2 of the commitment is complete. The NRC review of the analysis and inspection plan is documented in NRC to VY letter, Core Plate Hold Down Bolt Inspection Plan and Analysis – Vermont Yankee Nuclear Power Station, dated March 28, 2012, NVY 12-023.</p> <p>Commitments made in regard to the inspection plan in VY to NRC letter, Response to Request for Additional Information Regarding Core Plate Hold-down Bolt Inspection Plan and Analysis, dated February 1, 2012, BVY 12-008, are not considered to be commitments governed by License Condition 3.Q because they are outside the scope of LRC 29.</p> <p>There are no further actions required to be taken for this commitment during the PEO.</p>	Since the commitment has been completed, relocating it to a licensee-controlled document is administrative in nature.
30	Revise System Walkdown Program to specify CO2 system inspections every 6 months.	Implemented <sup>1</sup>	The CO2 system is part of the Fire Protection program. Technical Specifications pertaining to elements of the Fire Protection program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
31	Revise Fire Water System Program to specify annual fire hydrant gasket inspections and flow tests.	Implemented <sup>1</sup>	Technical Specifications pertaining to elements of the Fire Protection program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
32	Implement the Metal Enclosed Bus Program.  Details are provided in a LRA Amendment 16, Attachment 3 and LRA Amendment 23, 7.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
34	Implement the Bolting Integrity Program.  Details are provided in a LRA Amendment 16, Attachment 2 and LRA Amendment 23, Attachment 5.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Superseded <sup>1</sup>	This commitment has been superseded by License Condition 3.S. The NRC letter transmitting the VY Renewed Facility Operating License, dated March 21, 2011, stated:  <i>Commitment No. 37 in Appendix A of NUREG-1907 has been rendered null and void. Entergy will be required to apply for a license amendment if it desires to implement BWRVIP-139 at VYNPS.</i>	Since this commitment has been superseded by a license condition, it is acceptable for this commitment to no longer be controlled under a separate license condition governing commitment implementation.
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
39	If the VYNPS standby capsule is removed from 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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
40	This Commitment has been deleted and replaced with Commitment 43.	N/A	N/A	N/A
41	This Commitment has been deleted and replaced with Commitment 43.	N/A	N/A	N/A

**TABLE 1  
VERMONT YANKEE NUCLEAR POWER STATION  
LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
42	Implement the Bolted Cable Connections Program. Details are provided in LRA Amendment 23, attachment 7.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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 6 years after the initial test.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
44	This Commitment has been deleted and replaced with Commitment 54.	N/A	N/A	N/A
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.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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 and for particulates per ASTM D2276. Also, fuel oil in the John Deere diesel storage tank will be analyzed for particulates per ASTM D2276.	Implemented <sup>1</sup>	The diesel fire pump is part of the Fire Protection program. Technical Specifications pertaining to elements of the Fire Protection program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
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, per ASTM D2276 for particulates, and per ASTM D2709 for water and sediment.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
48	Perform an internal inspection of the underground Service Water piping before entering the period of extended operation.	Implemented	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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.	Implemented <sup>1</sup>	Technical Specifications pertaining to elements of the Fire Protection program were relocated from the TS to the VY Technical Requirements Manual and License Condition 3.F by License Amendment No. 168.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.
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 97-025 if it is determined that the required inspections are not being performed.	Implemented <sup>1</sup>	The Vernon Dam is not a SSC owned by VY. The Vernon dam is subject to the Federal Energy Regulatory Commission (FERC) 5-year inspection program regardless of the status of this commitment.	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
51	<p>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.</p>	Complete	<p>The actions associated with this commitment were completed prior to the PEO. There are no additional actions to be performed during the PEO.</p>	<p>Since the commitment has been completed, relocating it to a licensee-controlled document is administrative in nature.</p>
52	<p>Implement the Neutron Absorber Monitoring Program as described in LRA Section B.1.31.</p> <p>Test one coupon prior to the PEO to measure B-10 areal density and assess the geometric and physical condition of the tested coupon. If coupons are not able to be retrieved and tested or if coupons cannot be demonstrated representative of the Boral in the Holtec racks, then perform neutron attenuation testing using in-situ methods, as described in BVY 11-010, (BADGER or blackness testing method) prior to the end of 2014.</p>	Implemented	<p>VY TS 5.5.B-E governs the operation of spent fuel storage.</p>	<p>This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.</p>
53	<p>During the period of extended operation, VYNPS will perform periodic volumetric examinations of small-bore Class 1 socket and butt welds. The examinations will include 10% of the Class 1 weld population greater than or equal to 1 and less than 4 inch NPS up to a total of 25 welds of each weld type. In lieu of a volumetric examination for socket welds, a destructive examination may be performed. Each destructive exam will be equivalent to two ultrasonic examinations when determining the number of completed inspections. The examination method will be a volumetric examination of the base and weld metal using a demonstrated ultrasonic examination technique. Inspection results will determine the need for additional or periodic examinations. The examinations will be performed by December 2016.</p>	Implemented	N/A	<p>This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.</p>

**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
54	<p>Prior to the PEO, VYNPS will inspect portions of the standby gas treatment system buried piping. The inspections will consist of direct visual examination of a minimum of two sections of piping and cover the entire circumference of at least ten linear feet of piping in each section.</p> <p>During the PEO, inspections of two carbon steel piping segments in the standby gas treatment system and four carbon steel piping segments in the service water system will be performed every 10 years if measured soil resistivity is &gt; 20,000 ohm-cm and the soil corrosivity index is 10 or less using AWWA C105. If the soil resistivity is &lt; 20,000 ohm-cm or the soil corrosivity index is higher than 10 points using AWWA C105, the number of inspections of the standby gas treatment system buried piping will be increased to three and the number of inspections of the service water system buried piping will be increased to six. Each of these direct visual inspections following excavation will cover the entire circumference of at least ten linear feet of piping.</p> <p>During the PEO, two inspections covering at least 8% of the total length of in-scope buried fuel oil piping (~40 feet) will be performed at least once every 10 years. If the soil resistivity is &lt; 20,000 ohm-cm or the soil corrosivity index is higher than 10 points using AWWA C105, the percentage of fuel oil buried piping inspected will be increased to 12%.</p> <p>Soil samples will be taken prior to the period of extended operation and at least once every 10 years thereafter to confirm the initial sample results.</p>	Implemented	N/A	<p>This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.</p>



**TABLE 1**  
**VERMONT YANKEE NUCLEAR POWER STATION**  
**LICENSE RENEWAL COMMITMENTS**

ITEM	COMMITMENT	STATUS	ADDITIONAL TECHNICAL JUSTIFICATION	CONCLUSION
55	Enhance safety-related coatings programs and procedures to be consistent with the recommendations of NUREG-1801, Section XI.S8, Protective Coating Monitoring and Maintenance Program.	Implemented <sup>1</sup>	N/A	This commitment does not meet the criteria for inclusion in the technical specifications by 10 CFR 50.36 and does not constitute an issue of high safety or regulatory significance. Therefore, this commitment need not be considered as an obligation.

NOTES:

1. NRC review of commitment documented in Inspection Report 05000271/2012008, dated April 20, 2012
2. Proposed change to commitment included in Vermont Yankee letter to NRC, "License Amendment Request to Revise License Renewal Commitments," dated March 12, 2012, BVY 12-016
3. NRC review of commitment documented in Inspection Report 05000271/2011011, dated December 22, 2011

## REFERENCES

1. Letter, VY to USNRC, Updated Final Safety Analysis Report, Revision 25 Update, dated April 24, 2012, BVY 12-026
2. Letter, VY to USNRC, Proposed Change No. 300 Renewed Facility Operating License Condition 3.P and 3.Q Changes, dated March 5, 2012, BVY 12-015
3. NUREG-1907, Safety Evaluation Report Related to the License Renewal of Vermont Yankee Nuclear Power Station, dated May 2008
4. NUREG-1907 Supplement 2, Safety Evaluation Report Related to the License Renewal of Vermont Yankee Nuclear Power Station, dated March 2011
5. Letter, VY to USNRC, Completion of Activities to Support Entry Into Period of Extended Operation, dated March 16, 2012, BVY 12-017
6. Letter, USNRC to VY, Vermont Yankee Nuclear Power Station – NRC Integrated Inspection Report 05000271/2011011, dated December 22, 2011
7. Letter, USNRC to VY, Vermont Yankee Nuclear Power Station – NRC Inspection Report 05000271/2012008, dated April 20, 2012

Attachment 2

Vermont Yankee Nuclear Power Station

Proposed Change 300, Supplement 1

Markup of Current Renewed Facility Operating License Page

6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

- (c) Actions to minimize release to include consideration of:
1. Water spray scrubbing
  2. Dose to onsite responders

- O. The licensee shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

- P. ~~The information in the UFSAR supplement, as revised, submitted pursuant to 10 CFR 54.21(d), shall be incorporated into the next UFSAR no later than the next scheduled update required by 10 CFR 50.71(e), following the issuance of this renewed operating license. Until this update is complete, Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. may make changes to the information in the supplement without Commission approval provided that Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc., evaluates such changes pursuant to the criteria in 10 CFR 50.59 and otherwise complies with the requirements of that section.~~

Insert 1

- Q. The UFSAR supplement, as revised, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to and/or during the period of extended operation. Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. shall complete these activities in accordance with Appendix A of Supplement 2 to NUREG-1907, "Safety Evaluation Report Related to the License Renewal of Vermont Yankee Nuclear Power Station," issued March 2011 (excluding Commitment No. 37, which is superseded by the steam dryer license condition). Entergy Nuclear Vermont Yankee, LLC or Entergy Nuclear Operations, Inc. shall notify the NRC in writing when activities to be completed prior to the period of extended operation are complete and can be verified by NRC inspection.
- R. Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. shall implement the most recent staff-approved version of the Boiling Water Reactor Vessels and Internals Project (BWRVIP) Integrated Surveillance Program (ISP) as the method to demonstrate compliance with the requirements of 10 CFR Part 50, Appendix H. Any changes to the BWRVIP ISP capsule withdrawal schedule must be submitted for NRC staff review and approval. Any changes to the BWRVIP ISP capsule withdrawal schedule which affects the time of withdrawal of any surveillance capsules must be incorporated into the licensing basis. If any surveillance capsules are removed without the intent to test them, these capsules must be stored in a manner which maintains them in a condition which would support re-insertion into the reactor pressure vessel, if necessary.

Renewed Facility Operating License No. DPR-28

Amendment No.

Insert

1. The information in the UFSAR supplement, submitted pursuant to 10 CFR 54.21(d), as revised during the license renewal application process, as supplemented by Commitment Nos. 1, 2, 3, 4, 5, 6 (as revised by Entergy Nuclear Vermont Yankee, LLC letter dated May 19, 2011), 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 30, 31, 32, 33, 34, 35, 36, 38, 39, 42, 43, 45, 46, 47, 48, 49, 50, 52, 53, 54 and 55 of Appendix A of Supplement 2 of NUREG-1907 is henceforth part of the UFSAR which will be updated in accordance with 10 CFR 50.71(e). As such, Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. may make changes to the programs and activities described in the UFSAR supplement and Commitment Nos. 1, 2, 3, 4, 5, 6 (as revised by Entergy Nuclear Vermont Yankee, LLC letter dated May 19, 2011), 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 30, 31, 32, 33, 34, 35, 36, 38, 39, 42, 43, 45, 46, 47, 48, 49, 50, 52, 53, 54 and 55 of Appendix A of Supplement 2 of NUREG-1907 provided Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

Attachment 3

Vermont Yankee Nuclear Power Station

Proposed Change 300, Supplement 1

Retyped Renewed Facility Operating License Page

6. Training on integrated fire response strategy
  7. Spent fuel pool mitigation measures
- (c) Actions to minimize release to include consideration of:
1. Water spray scrubbing
  2. Dose to onsite responders
- O. The licensee shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.
- P. The information in the UFSAR supplement, submitted pursuant to 10 CFR 54.21(d), as revised during the license renewal application process, as supplemented by Commitment Nos. 1, 2, 3, 4, 5, 6 (as revised by Entergy Nuclear Vermont Yankee, LLC letter dated May 19, 2011), 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 30, 31, 32, 33, 34, 35, 36, 38, 39, 42, 43, 45, 46, 47, 48, 49, 50, 52, 53, 54 and 55 of Appendix A of Supplement 2 of NUREG-1907 is henceforth part of the UFSAR which will be updated in accordance with 10 CFR 50.71(e). As such, Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. may make changes to the programs and activities described in the UFSAR supplement and Commitment Nos. 1, 2, 3, 4, 5, 6 (as revised by Entergy Nuclear Vermont Yankee, LLC letter dated May 19, 2011), 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 30, 31, 32, 33, 34, 35, 36, 38, 39, 42, 43, 45, 46, 47, 48, 49, 50, 52, 53, 54 and 55 of Appendix A of Supplement 2 of NUREG-1907 provided Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.
- Q. The UFSAR supplement, as revised, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. shall complete these activities in accordance with Appendix A of Supplement 2 to NUREG-1907, "Safety Evaluation Report Related to the License Renewal of Vermont Yankee Nuclear Power Station," issued March 2011 (excluding Commitment No. 37, which is superseded by the steam dryer license condition). Entergy Nuclear Vermont Yankee, LLC or Entergy Nuclear Operations, Inc. shall notify the NRC in writing when activities to be completed prior to the period of extended operation are complete and can be verified by NRC inspection.
- R. Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. shall implement the most recent staff-approved version of the Boiling Water Reactor Vessels and Internals Project (BWRVIP) Integrated Surveillance Program (ISP) as the method to demonstrate compliance with the requirements of 10 CFR Part 50, Appendix H. Any changes to the BWRVIP ISP capsule withdrawal schedule must be submitted for NRC staff review and approval. Any changes to the BWRVIP ISP capsule withdrawal schedule which affects the time of withdrawal of any surveillance capsules must be incorporated into the licensing basis. If any surveillance capsules are removed without the intent to test them, these capsules must be stored in a manner which maintains them in a condition which would support re-insertion into the reactor pressure vessel, if necessary.