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Christopher J. Wamser
Site Vice President

BVY 15-021

April 1, 2015

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

SUBJECT: Security Plan Changes
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

- REFERENCE:
1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Certifications of Permanent Cessation of Power Operations and Permanent Removal of Fuel from the Reactor Vessel," BVY 15-001, dated January 12, 2015 (ML15013A426)
 2. Nuclear Energy Institute (NEI) 11-08, "Guidance on Submitting Security Plan Changes," Revision 0, August 2012
 3. USNRC Nuclear Security Incident Response/Division of Security Policy – Interim Staff Guidance (NSIR/DSP-ISG)-03, "Review of Security Exemptions/License Amendment Requests for Decommissioning Nuclear Power Plants," November 25, 2014 (ML 14294A170)

Dear Sir or Madam:

Pursuant to 10 CFR 50.54(p)(2), Entergy Nuclear Operations, Inc. (Entergy) is submitting to the USNRC changes to the Security Plan for Vermont Yankee Nuclear Power Station (VY). These

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Attachments 2, 3, and 6 contains ~~Safeguards Information~~. Attachments 1, 4, 5, and 8 contains ~~Security Related Information Exempt from Public Disclosure in accordance with 10 CFR 2.390~~. When separated from these attachments this letter and the remaining attachment 7 are considered decontrolled and available for public disclosure.

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changes were made as a consequence of the permanent cessation of power operations and the permanent removal of fuel from the reactor vessel to the spent fuel pool at VY (Reference 1). The revised Security Plan is provided as Attachment 2 to this letter.

VY has performed an NEI 11-08 evaluation (Reference 2) of each change to the Security Plan. This evaluation describes the proposed implementation of physical protection measures and protective strategy at the VY site. Based on this evaluation, VY has concluded that the changes do not reduce the effectiveness of the Security Plan, nor do they decrease the ability of the onsite physical protection system and security organization to protect the spent fuel with high assurance against the Design Basis Threat (DBT) of radiological sabotage. Consistent with this evaluation, VY has concluded that no exemptions (10 CFR 73.5), license amendments (10 CFR 50.90) and/or alternative security measures (10 CFR 73.55(r)) are needed to allow implementation of the revised Security Plan. The NEI 11-08 evaluation is provided as Attachment 3 to this letter.


Consistent with the guidance provided by the Staff in NSIR/DSP-ISG-03 (Reference 3), the attachments to this letter are provided to facilitate the Staff's understanding of the changes to the Security Plan and the supporting NEI 11-08 evaluation. In keeping with this statement, an Executive Summary is provided as Attachment 1 and an overview discussion of the attachments to this letter is provided as Attachment 4. VY recommends that the Staff commence its review of the revised Security Plan by first considering Attachment 1 and then Attachment 4 as together; these attachments provide a high level look at the revised Security Plan and a roadmap through the remaining attachments of this letter.

This letter contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Mr. Patrick Ryan at (802) 258-5838.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on April 1, 2015.

Sincerely,



CJW/KWK

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Attachments (8)

1. Executive Summary (S-RI)
2. Security Plan (SGI)
3. NEI 11-08 Evaluation (SGI)
4. Overview of Attachments (S-RI)
5. SAFSTOR Security Modifications (S-RI)
6. Summary of Phase I Security Plan Changes (SGI)
7. Drawings and Photos
8. VY Site Configurations and Decommissioning Operations (S-RI)

cc: Mr. Daniel H. Dorman
Regional Administrator, Region 1
U. S. Nuclear Regulatory Commission
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

NRC Senior Resident Inspector (w/o Attachments)
Vermont Yankee

Mr. James S. Kim, Project Manager (w/o Attachments)
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Mr. Christopher Recchia, Commissioner (w/o Attachments)
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