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John W. Boyle
Director, Nuclear Decommissioning

10 CFR 50.90
10 CFR 50.54(p)
10 CFR 73.55(r)

BVY 17-003

March 29, 2017

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

SUBJECT: Independent Spent Fuel Storage Installation Physical Security Plan, Revision 0
Proposed Change No. 315
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

- REFERENCES:**
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. NRC Interim Staff Guidance, NSIR/DSP-ISG-03, "Review of Security Exemptions/ License Amendment Requests for Decommissioning Nuclear Power Plants," September 28, 2015 (ML15106A737)
 3. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Application for Order Consenting to Direct and Indirect Transfers of Control of Licenses and Approving Conforming License Amendment and Notification of Amendment to Decommissioning Trust Agreement," BVY 17-005, dated February 9, 2017

Dear Sir or Madam:

Pursuant to the provisions of 10 CFR 50.4, 10 CFR 50.54(p), 10 CFR 73.55(r), and 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) requests approval of the enclosed Vermont Yankee Nuclear Power Station (VY) Independent Spent Fuel Storage Installation (ISFSI) Physical Security Plan (PSP), Revision 0. The Training and Qualification Plan and the Safeguards Contingency Plan are Appendices to the ISFSI PSP. Proposed Revision 0 of the ISFSI PSP will replace in its entirety Revision 18 of the VY Security Plan, which is currently in

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effect. This submittal does not address the protection of material subject to the requirements of 10 CFR 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Materials," which is addressed in a separate plan. This submittal also does not propose changes to the requirements of 10 CFR 73.54, "Protection of digital computer and communication systems and networks," which is addressed by the cyber security plan. A separate transmittal will provide revised responses for those Orders which are applicable to the VY ISFSI in the condition with all irradiated fuel located in dry storage casks within the ISFSI.

The proposed changes are appropriate for a facility that has submitted the 10 CFR 50.82(a) certifications for permanent cessation of power operations and the permanent removal of fuel from the reactor vessel (Reference 1), and completed the transfer of all irradiated fuel to the ISFSI. Implementation of the proposed changes will be predicated upon the completion of the transfer of all irradiated fuel to dry storage in casks within the ISFSI. The movement of all irradiated fuel to the ISFSI will occur entirely within the existing Protected Area (PA), which includes the locations of the existing ISFSI pad and a second pad currently under construction and expected to be completed in September 2017. Implementation of the proposed changes will also require the installation or modification of security structures, systems and components necessary to support the ISFSI PSP, and appropriate security measures to be in place during the transition from the current Security Plan to the ISFSI PSP.

The campaign to transfer the remaining irradiated fuel located in the spent fuel pool (SFP) to the ISFSI, scheduled to commence in April 2017, is in accordance with the most recently approved (Amendment 10) Certification of Compliance No. 72-1014 for the Holtec International (Holtec) HI-STORM 100 Cask System, or later amendment or other NRC approved licensing actions. These actions are anticipated to result in the criteria being met to allow the transfer of spent fuel to the ISFSI to be completed as early as mid-2018. This amendment request for the ISFSI PSP is not intended to be dependent on the approval of any licensing actions related to the fuel campaign.

The proposed ISFSI PSP is consistent with the guidance provided by NRC Staff in NSIR/DSP-ISG-03, "Review of Security Exemptions/License Amendment Requests for Decommissioning Nuclear Power Plants" (Reference 2).

Pursuant to 10 CFR 50.91(a)(1), ENO has performed an evaluation and determined that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified. Furthermore, ENO has evaluated this proposed license amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21 and has concluded, pursuant to 10 CFR 51.22(b), that no environmental impact statement or environment assessment need be prepared in connection with the proposed amendment. The basis for these evaluations is provided in attachments 1, 2 and 3 of this letter.

Attachment 1 to this letter provides a summary and an evaluation of the proposed changes (uncontrolled version) which includes the no significant hazards consideration determination

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and environmental considerations. Attachment 2 to this letter provides a markup of the current VY Renewed Facility Operating License to reflect the changes to Condition 3.G, "Security Plan," and Attachment 3 to this letter provides the retyped (clean) page.

Enclosure 1 contains Security-Related Information to be withheld from public disclosure pursuant to 10 CFR 2.390. Enclosure 1 provides a description and evaluation of the proposed changes for the ISFSI PSP, including a description of programmatic assumptions applied to the development of the ISFSI PSP based on 10 CFR 72.212(b)(9), a summary of the alternative measures requested pursuant to 10 CFR 73.55(r), the no significant hazards consideration determination, and environmental considerations. Enclosure 1 also provides a report describing key design features of the ISFSI PSP, a list of Orders applicable to the ISFSI PSP with cross-references to relevant sections of the ISFSI PSP, and compliance matrices for 10 CFR 73.55 (including Appendices B and C to Part 73) requirements with cross-references to relevant sections of the ISFSI PSP.

Enclosure 2 contains Safeguards Information as defined by 10 CFR 73.22 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended, and must be protected accordingly. Enclosure 2 provides the proposed ISFSI PSP Revision 0 and detailed discussions and evaluations for the alternative measures requested pursuant to 10 CFR 73.55(r).

Upon separation from Enclosures 1 and 2, this letter and Attachments 1, 2 and 3 to this letter are decontrolled.

ENO is requesting NRC approval of this proposed license amendment by June 30, 2018, based on the anticipated completion of the planned dry fuel storage campaigns, subject to certain regulatory approvals. Once approved, implementation of the ISFSI PSP will commence only after notification to NRC of the completion of the transfer of all spent fuel to the ISFSI.

ENO has submitted an application for transfer of the VY licenses, requesting issuance of an Order by December 31, 2017, for approval of amendments to the VY facility license with authorization for the transfers to take place at any time up to December 31, 2018 (Reference 3). NRC review of Reference 3 is anticipated to occur concurrently with review of this amendment request for the ISFSI PSP Revision 0. However, this request for the ISFSI PSP is not intended to rely on approval of Reference 3, and is being submitted for approval and implementation independent of NRC approval of Reference 3.

Pursuant to 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), a copy of this application for license amendment, with Attachments 1, 2 and 3, is being provided to the State of Vermont, Department of Public Service.

This letter contains no new regulatory commitments.

Should you have any questions concerning this transmittal, please contact Mr. Coley Chappell at 802-451-3374.

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Should you have any questions concerning this transmittal, please contact Mr. Coley Chappell at 802-451-3374.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 29, 2017.



JWB/kwk

Attachments:

1. Summary and Evaluation of Proposed Changes (Uncontrolled)
2. Proposed VY Renewed Facility Operating License Change – Markup (Uncontrolled)
3. Revised VY Renewed Facility Operating License Page – Clean Page (Uncontrolled)

Enclosures:

1. Description and Evaluation of Proposed Changes, Applicable Orders for VY ISFSI, General Description of Physical Security Features, and Compliance Matrices to 10 CFR 73.55 and Appendices B and C to 10 CFR 73.55 (Security-Related Information)
2. ISFSI PSP Revision 0 and Proposed Alternative Measures (Safeguards Information)

cc: Mr. Daniel H. Dorman (w/o Enclosures)
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