

# ~~SAFEGUARDS INFORMATION~~



Entergy Nuclear Operations, Inc.  
Vermont Yankee  
320 Governor Hunt Road  
Vernon, Vermont 05354  
Tel: (802) 257-7711

**John W. Boyle**  
Director, Nuclear Decommissioning

10 CFR 2.202  
10 CFR 50.4

BVY 17-019

June 28, 2017

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

**SUBJECT:** Updated Responses to Orders Applicable to the Proposed Independent Spent Fuel Storage Installation Physical Security Plan  
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. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Independent Spent Fuel Storage Installation Physical Security Plan, Revision 0, Proposed Change No. 315," BVY 17-003, dated March 29, 2017 (ML17117A421)

Dear Sir or Madam:

In accordance with 10 CFR 50.4, Entergy Nuclear Operations, Inc. (ENO) hereby submits information in response to the following Orders previously issued by the United States Nuclear Regulatory Commission (NRC) under the provisions of 10 CFR 2.202:

EA-02-026	Interim Safeguards and Security Compensatory Measures
EA-03-086	Design Basis Threat
EA-06-037	Updated Adversary Characteristic
EA-06-116	ISFSI – Interim Safeguards and Security Compensatory Measures
EA-06-117	ISFSI – Implementation of Additional Security Measures Associated with Access Authorization

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ENCLOSURE 1 TO THIS LETTER CONTAINS "~~SAFEGUARDS INFORMATION~~" WHICH MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION FROM ENCLOSURE 1, THIS LETTER IS "DECONTROLLED."

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By letter dated January 12, 2015 (Reference-1), ENO submitted the certifications for Vermont Yankee Nuclear Power Station (VY) for permanent cessation of reactor operations and permanent removal of fuel from the reactor vessel pursuant to 10 CFR 50.82(a)(1). Upon docketing of these certifications, under 10 CFR 50.82(a)(2) the VY 10 CFR Part 50 license no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel.

By letter dated March 29, 2017 (Reference 2), ENO submitted a proposed VY Independent Spent Fuel Storage Installation (ISFSI) Physical Security Plan (PSP) for NRC review, to be implemented following the transfer of all spent nuclear fuel to the ISFSI. The proposed ISFSI PSP was requested to be approved by June 30, 2018.

Enclosure 1 provides revised responses to the Orders listed above, which remain applicable to VY after all spent fuel is transferred from the spent fuel pool to dry storage within the ISFSI. The revised responses are appropriate for a facility in this condition, and applicable to information submitted for the proposed VY ISFSI PSP. In addition, the ISFSI PSP reflects an ISFSI-only site configuration using dry storage that is not collocated with an operating power reactor facility; therefore, this configuration is governed specifically by Attachment 1, Item B of Order EA-06-116. Hence, the revised responses to the Orders will be implemented as described in, and concurrently with, the ISFSI PSP. The revised responses are being provided in support of NRC review of the proposed ISFSI PSP.

Enclosure 1 contains Safeguards Information (SGI) and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended. Therefore, the information must be protected accordingly, and ENO requests that it be withheld from public disclosure in accordance with 10 CFR 73.22. Upon separation from Enclosure 1, this letter is decontrolled.

This letter contains no new regulatory commitments.

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 June 28, 2017.

Sincerely,



JWB/kwk

Enclosure:

1. Applicable Orders Response Update for VY ISFSI Physical Security Plan (SGI)

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

Mr. Jack D. Parrott, Senior Project Manager (w/o Enclosure)  
Office of Nuclear Material Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
Mail Stop T-8F5  
Washington, DC 20555

Ms. June Tierney, Commissioner (w/o Enclosure)  
Vermont Department of Public Service  
112 State Street – Drawer 20  
Montpelier, Vermont 05602-2601

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