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May 3, 2018

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Vermont Public Service Department Comments on the Forthcoming Issuance of a License Amendment Regarding the Elimination of Vermont Yankee Cyber Security Plan Requirements

REFERENCES:

1. E-Mail from Jack Parrott (USNRC) to June Tierney (VT Public Service), "Vermont Yankee Nuclear Power Station - Forthcoming Issuance of a License Amendment Regarding the Requirement for the VYNPS to have a Cyber Security Plan," dated April 25, 2018
2. Entergy Letter BVY 17-022 to USNRC, "License Amendment Request - Cyber Security Plan License Condition Removal Proposed Change No. 316, Vermont Yankee Nuclear Power Station, Docket No. 50-271, License No. DPR-28," dated July 13, 2017 (ML17198A020)

Dear Mr. Parrott:

In response to your electronic mailing sent April 25, 2018 (Reference 1) requesting comments on the NRC's draft Safety Evaluation Report (SER) regarding Vermont Yankee's request to eliminate its Cyber Security Plan (Reference 2), I directed Vermont Public Service Department (VT PSD) Staff to evaluate the draft SER enclosed with Reference 1 as well as Vermont Yankee's original request included in Reference 2. The purpose of this letter is to provide you with the comments resulting from this evaluation.

VT PSD's evaluation found no technical reason requiring Vermont Yankee (VY) to continue its Cyber Security Plan. All VY spent fuel has now cooled for a minimum of 3.25 years since VY's cessation of power generation, which has significantly reduced the need for active plant systems to achieve adequate spent fuel cooling. Moreover, nearly two-thirds of the VY's spent fuel is now cooled via passive means (namely air circulation). Accordingly, a Cyber Security Plan, which primarily assures that active plant systems are not vulnerable to cyber-attack, is no longer essential to maintaining sufficient spent fuel cooling. The overall safety of VY's spent fuel now relies upon its physical protection and by demonstrating the continued integrity of its storage systems.



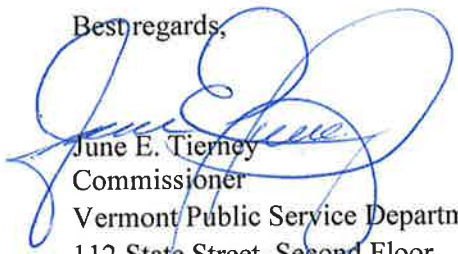
VT PSD's conclusion that VY's Cyber Security Plan is no longer essential is based on several assumptions, namely that:

1. Adequate cooling of the VY spent fuel stored in so called "dry cask" storage systems continues to be confirmed through daily inspection of the storage system vents and through regular checks with hand-held radiation monitors;
2. An onsite security force remains in place to physically protect VY's spent fuel from Hostile Actions or sabotage;
3. The onsite security force retains several different means of communications, thereby limiting its own vulnerability to cyber-attacks;
4. For as long as spent fuel is still stored in the VY Spent Fuel Pool, VY Staff will continue to maintain the ability to manually operate plant systems critical to maintaining Spent Fuel Pool integrity without relying upon digital assets.

Accordingly, if Vermont Yankee continues to maintain site conditions consistent with these four assumptions, VT PSD has no technical objections to Vermont Yankee eliminating its Cyber Security Plan. Questions or requests for additional information regarding VT PSD's evaluation in this matter may be directed to my office or to the Vermont State Nuclear Engineer, Mr. Anthony R. Leshinskie at 802-272-1714 or Anthony.leshinskie@vermont.gov.

On behalf of the State of Vermont, I thank you for this opportunity to comment on this Vermont Yankee License Amendment Request. I look forward to similar comment opportunities in the future.

Best regards,



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