



Entergy Nuclear Operations, Inc.
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Christopher J. Wamser
Site Vice President

BVY 14-052

July 16, 2014

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

SUBJECT: Technical Specifications Proposed Change No. 307, Revision to Technical Specification Administrative Controls for Permanently Defueled Condition - Supplement 2 (TAC No. MF2991)
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

REFERENCES: 1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Technical Specifications Proposed Change No. 307, Revision to Mitigation Strategy License Condition and Technical Specification Administrative Controls for Permanently Defueled Condition," BVY 13-096, dated October 31, 2013 (ML13316A004) (TAC No. MF2991)

Dear Sir or Madam:

By letter dated October 31, 2013 (Reference 1), Entergy Nuclear Operations, Inc. (ENO) proposed an amendment to Renewed Facility Operating License (OL) DPR-28 for Vermont Yankee Nuclear Power Station (VY). This amendment request proposed changes to the staffing, training and programmatic requirements contained in Section 6.0, Administrative Controls, of the VY Technical Specifications (TS) to support the transition of the VY facility to a permanently defueled condition.

ENO has identified additional changes to Section 6.0 of the TS that are needed to allow VY the flexibility to adopt a stand-alone Quality Assurance Program Manual and to ensure that procedures focus on the safe storage of spent nuclear fuel.

Attachment 1 to this letter provides a detailed description and evaluation of the proposed changes. Attachment 2 contains a markup of the current TS page that builds on the markups provided in Reference 1. Attachment 3 contains the retyped TS page incorporating the changes proposed in this supplement and those in Reference 1.

The conclusions of the no significant hazards consideration and the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this supplement.

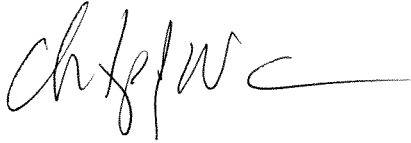
There are no new regulatory commitments made in this letter.

If you have any questions on this transmittal, please contact Mr. Philip Couture at 802-451-3193.

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

Executed on July 16, 2014.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Recchia", with a long horizontal flourish extending to the right.

CJW/plc

- Attachments:
1. Description and Evaluation of Proposed Changes
 2. Markup of Technical Specification Page
 3. Retyped Technical Specification Page

cc: Mr. William M. Dean
Region 1 Administrator
U.S. Nuclear Regulatory Commission
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Mr. James S. Kim, Project Manager
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Office of Nuclear Reactor Regulation
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USNRC Resident Inspector
Vermont Yankee Nuclear Power Station
320 Governor Hunt Road
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Mr. Christopher Recchia, Commissioner
VT Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601

Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Change 307 - Supplement 2

Description and Evaluation of Proposed Changes

1. SUMMARY DESCRIPTION

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) provided notification of the intention to permanently cease power operations of Vermont Yankee Nuclear Power Station (VY) in accordance with 10 CFR 50.82(a)(1)(i) at the end of the current operating cycle.

In Reference 2, ENO submitted proposed changes that would revise and remove certain requirements contained within Section 6.0, Administrative Controls, of the VY Technical Specifications (TS) consistent with the planned transition to a permanently defueled facility. Additional changes to Section 6.0 of the TS have been identified that are needed to allow VY the flexibility to adopt a stand-alone Quality Assurance Program Manual and to ensure that procedures focus on the safe storage of spent nuclear fuel.

2. DETAILED DESCRIPTION AND BASIS FOR THE CHANGES

The following table identifies each section that is being changed, the proposed changes, and the basis for the changes:

Proposed Changes to VY Technical Specification Section 6.0, Administrative Controls	
6.2 Organization	
<u>Current TS 6.2.C, Unit Staff Qualifications</u> 1. Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Entergy Quality Assurance Program Manual (QAPM).	<u>Proposed TS 6.2.C, Unit Staff Qualifications</u> 1. Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM).
Basis	
<p><u>TS 6.2.C.1</u> - This TS specifies the minimum qualifications for the VY staff. The proposed change to this TS revises the title of the QAPM by removing specific reference to the Entergy corporate QAPM. This change will allow VY to transition from the Entergy corporate QAPM to a site-specific QAPM during the decommissioning process. No change to the qualification standards or exceptions to the standards are proposed. Accordingly, this change is administrative only.</p>	
6.4 Procedures	
<u>Current TS 6.4</u> Written procedures shall be established, implemented, and maintained covering the	<u>Proposed TS 6.4</u> Written procedures shall be established, implemented, and maintained covering the

<p>following activities:</p> <p>A. Normal startup, operation and shutdown of systems and components of the facility.</p> <p>C. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, suspected Primary System leaks and abnormal reactivity changes.</p>	<p>following activities:</p> <p>A. Normal startup, operation and shutdown of systems and components needed for the safe storage of nuclear fuel.</p> <p>C. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components needed for the safe storage of nuclear fuel.</p>
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Basis

TS 6.4.A - This TS is proposed to be revised to specify that procedures are required for normal startup, operation and shutdown of systems and components necessary to ensure the safe storage of nuclear fuel, rather than the facility, to be consistent with the planned transition to a permanently defueled facility. Once the certifications required by 10 CFR 50.82(a)(1) have been submitted to the NRC, operation of the reactor will be prohibited and the operational focus will be on the spent fuel pool and associated makeup and cooling systems.

(NOTE: Changes were proposed to TS 6.4.C in Reference 2. Additional changes are proposed to the TS in this supplement to clarify the applicability of the TS to systems and components needed for safe storage of nuclear fuel. The justification for the changes proposed in Reference 2 are reproduced for consistency)

TS 6.4.C - This TS is being revised to reflect that once the reactor is permanently defueled, reactivity changes in the reactor vessel will no longer be possible and the Primary Systems that provide reactor core cooling will no longer be required. Therefore, a requirement to have procedural direction to address reactivity changes or suspected Primary System leakage does not apply in the permanently defueled condition.

Since operation of the reactor will be prohibited and the operational focus will be on the spent fuel pool and associated makeup and cooling systems, the proposed change will require that procedures be in place to address malfunctions of systems or components needed for the safe storage of nuclear fuel to be consistent with the planned transition to a permanently defueled facility.

References

1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Notification of Permanent Cessation of Power Operations," BVY 13-079, dated September 23, 2013 (ML13273A204)
2. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Technical Specifications Proposed Change No. 307, Revision to Mitigation Strategy License Condition and Technical Specification Administrative Controls for Permanently Defueled Condition," BVY 13-096, dated October 31, 2013 (ML13316A004) (TAC No. MF2991)

Attachment 2

Vermont Yankee Nuclear Power Station
Proposed Change 307 - Supplement 2
Markup of Technical Specification Page

6.2 ORGANIZATION (Cont'd)

C. Unit Staff Qualifications

1. Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Energy Quality Assurance Program Manual (QAPM).
2. ~~For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of Specification 6.2.C.1, perform the functions described in 10 CFR 50.54(m).~~

An NRC approved training and retraining program for Certified Fuel Handlers shall be maintained

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED

Deleted

~~Applies to administrative action to be followed in the event a safety limit is exceeded.~~

~~If a safety limit is exceeded, the reactor shall be shutdown immediately.~~

6.4 PROCEDURES

Written procedures shall be established, implemented, and maintained covering the following activities:

- A. Normal startup, operation and shutdown of systems and components of the facility.
- B. Refueling operations.
- C. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, ~~suspected Primary System leaks and abnormal reactivity changes.~~
- D. Emergency conditions involving potential or actual release of radioactivity.
- E. Preventive and corrective maintenance operations which could have an effect on the safety of the reactor.
- F. Surveillance and testing requirements.
- G. Fire protection program implementation.
- H. Process Control Program in-plant implementation.
- I. Off-Site Dose Calculation Manual implementation.

needed for the safe storage of nuclear fuel

Fuel handling

needed for the safe storage of nuclear fuel

nuclear fuel

6.5 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraphs 20.1601(a) and 20.1601(b) of 10 CFR 20:

- A. High Radiation Areas with dose rates greater than 0.1 rem/hour at 30 centimeters, but not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation:

Attachment 3

Vermont Yankee Nuclear Power Station

Proposed Change 307 - Supplement 2

Retyped Technical Specification Page

6.2 ORGANIZATION (Cont'd)

C. Unit Staff Qualifications

1. Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM).
2. An NRC approved training and retraining program for Certified Fuel Handlers shall be maintained.

6.3 Deleted

6.4 PROCEDURES

Written procedures shall be established, implemented, and maintained covering the following activities:

- A. Normal startup, operation and shutdown of systems and components needed for the safe storage of nuclear fuel.
- B. Fuel handling operations.
- C. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components needed for the safe storage of nuclear fuel.
- D. Emergency conditions involving potential or actual release of radioactivity.
- E. Preventive and corrective maintenance operations which could have an effect on the safety of the nuclear fuel.
- F. Surveillance and testing requirements.
- G. Fire protection program implementation.
- H. Process Control Program in-plant implementation.
- I. Off-Site Dose Calculation Manual implementation.

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As provided in paragraph 20.1601(c) of 10 CFR 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraphs 20.1601(a) and 20.1601(b) of 10 CFR 20:

- A. High Radiation Areas with dose rates greater than 0.1 rem/hour at 30 centimeters, but not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation: