

VERMONT YANKEE LICENSING DEPARTMENT
Outgoing NRC Correspondence Distribution

FOR INFORMATION

BVY 15-022

DATE: 3/27/15

YES NO 10CFR19.11(a)(4) action? If yes, posting required within 2 working days after dispatch.

SUBJECT: NOTIFICATION OF CHANGES TO

REGULATORY COMMITMENTS

LICENSING LEAD: PHIL COUTURE

COMMITMENTS: YES (Enter EN-LI-110) (NO)

COMMENTS: NONE

<u>BRATTLEBORO DISTRIBUTION</u>	<u>VERNON DISTRIBUTION</u>																		
<p><u>By Subject:</u></p> <p><input type="checkbox"/> Mike McKenney, Manager, Emergency Preparedness</p> <p><input type="checkbox"/> VY AA/FFD</p> <p><input type="checkbox"/> Other:</p> <p><u>White Plains:</u></p> <p><input type="checkbox"/> Guy Davant, Manager, Licensing Programs, WPO</p> <p><input checked="" type="checkbox"/> Michael T Twomey, VP, External Affairs-Wholesale, WPO</p> <p><input type="checkbox"/> Other:</p> <p><u>Decommissioning:</u></p> <table style="width:100%;"> <tr> <td><input checked="" type="checkbox"/> Susan Raimo</td> <td><input checked="" type="checkbox"/> Andy Cardine</td> </tr> <tr> <td><input type="checkbox"/> Barrett Green</td> <td><input type="checkbox"/> Scott Dorval</td> </tr> <tr> <td><input type="checkbox"/> Jennifer Evans</td> <td><input type="checkbox"/> Mike Tessier</td> </tr> <tr> <td><input type="checkbox"/> Jeff Wagner</td> <td><input type="checkbox"/> Dave Duffy</td> </tr> <tr> <td><input type="checkbox"/> Dave Mannai</td> <td><input type="checkbox"/> Brian Copperthite</td> </tr> <tr> <td><input type="checkbox"/> Tim Ngau</td> <td><input checked="" type="checkbox"/> Phil Couture</td> </tr> <tr> <td><input type="checkbox"/> Steven Scheurich</td> <td><input type="checkbox"/> Nancy Eng</td> </tr> <tr> <td><input type="checkbox"/> P.L. Swigart</td> <td><input type="checkbox"/> Monique Hoffmeister</td> </tr> <tr> <td><input type="checkbox"/> Robin Nilson</td> <td><input type="checkbox"/> Elizabeth Hunter</td> </tr> </table>	<input checked="" type="checkbox"/> Susan Raimo	<input checked="" type="checkbox"/> Andy Cardine	<input type="checkbox"/> Barrett Green	<input type="checkbox"/> Scott Dorval	<input type="checkbox"/> Jennifer Evans	<input type="checkbox"/> Mike Tessier	<input type="checkbox"/> Jeff Wagner	<input type="checkbox"/> Dave Duffy	<input type="checkbox"/> Dave Mannai	<input type="checkbox"/> Brian Copperthite	<input type="checkbox"/> Tim Ngau	<input checked="" type="checkbox"/> Phil Couture	<input type="checkbox"/> Steven Scheurich	<input type="checkbox"/> Nancy Eng	<input type="checkbox"/> P.L. Swigart	<input type="checkbox"/> Monique Hoffmeister	<input type="checkbox"/> Robin Nilson	<input type="checkbox"/> Elizabeth Hunter	<p><u>All:</u></p> <p><input checked="" type="checkbox"/> Dodi Emery (Chronological File)</p> <p><input checked="" type="checkbox"/> Coley Chappell, Manager, Licensing</p> <p><u>By Subject:</u></p> <p><input type="checkbox"/> Chris Wamser, Site Vice President</p> <p><input type="checkbox"/> Mike Romeo, Plant Manager</p> <p><input checked="" type="checkbox"/> Jack Boyle, Director, Engineering</p> <p><input type="checkbox"/> Paul Paradis, Director, Decommissioning</p> <p><input type="checkbox"/> Ed Harms, Manager Operations</p> <p><input type="checkbox"/> Rhonda Felumb, Supervisor, CA&A</p> <p><input checked="" type="checkbox"/> Jim Rogers, Manager, Design Engineering</p> <p><input checked="" type="checkbox"/> George Wierzbowski, Manager, Programs/Systems</p> <p><input type="checkbox"/> Steve Naeck, Manager, Production/Maintenance</p> <p><input checked="" type="checkbox"/> Jim Cordell, Manager, Decommissioning</p> <p><input type="checkbox"/> Mike Pletcher, Manager, Chemistry/RP</p> <p><input type="checkbox"/> Patrick Ryan, Manager, Security</p> <p><input type="checkbox"/> Joe Laughney, Manager, QA</p> <p><input type="checkbox"/> Bob Burns, Maintenance Rule Program</p> <p><input checked="" type="checkbox"/> Jeff Meyer, State Liaison Engineer</p> <p><input type="checkbox"/> Scott Hill, Superintendent, Training</p> <p><input type="checkbox"/> Dodi Emery, All LER & License Amendment Requests to SRC members</p> <p><input checked="" type="checkbox"/> Joe Lynch, External Affairs Mgr.</p> <p><input checked="" type="checkbox"/> Martin Cohn, Communications Manager</p> <p><input type="checkbox"/> Other:</p> <p><input type="checkbox"/> Paper distribution or <input checked="" type="checkbox"/> Electronic distribution</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Distributed by: <u>DME</u> Date: <u>3/30/15</u></p> </div> <p align="center">Latest update: January 21, 2015 (DME)</p>
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Entergy Nuclear Operations, Inc.
Vermont Yankee
320 Governor Hunt Rd
Vernon, VT 05354
Tel 802 257 7711

Christopher J. Wamser
Site Vice President

BVY 15-022

March 27, 2015

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Notification of Changes to Regulatory Commitments
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

Dear Sir or Madam:

Pursuant to the guidance in Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0, attached is a summary of recently changed commitments at Vermont Yankee Nuclear Power Station. These commitment changes were evaluated as not requiring prior NRC approval.

This letter provides NRC notification of these changes. Attachment 1 includes a summary of regulatory commitment changes and a basis for each change. No NRC action is requested on this issue.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information concerning this submittal, please contact Mr. Coley Chappell at (802) 451-3374.

Sincerely,

A handwritten signature in black ink, appearing to read "Ch Wamser".

[CJW/plc]

Attachments:

1. Summary Report of Regulatory Commitment Changes

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

Mr. James S. Kim, Project Manager
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O8D15
Washington, DC 20555

USNRC Resident Inspector
Vermont Yankee

Mr. Christopher Recchia, Commissioner
VT Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05620-2601

Attachment 1

Vermont Yankee Nuclear Power Station
Summary Report of Regulatory Commitment Changes

VERMONT YANKEE NUCLEAR POWER STATION

COMMITMENT CHANGE SUMMARY REPORT

COMMITMENT NUMBERS	SOURCE(S)	ORIGINAL COMMITMENT(S)	PROPOSED CHANGE AND JUSTIFICATION
<p>16829, 16830, 16831, 16907, 16908, 16909, 16949</p>	<p>Letters to NRC dated October 14, 2008 and October 22, 2009</p>	<p>Revise applicable High Pressure Core Injection (HPCI) procedure(s) to require dynamic venting of HPCI discharge piping following any maintenance activities that could drain the system. (16909) Install vents on HPCI suction and discharge piping, Core Spray (CS) suction piping, Residual Heat Removal (RHR) suction piping and RHR Low Pressure Coolant Injection (LPCI) piping and revise applicable procedures to include periodic venting or Ultrasonic examination (UT). (16829, 16830, and 16949) Revise existing procedures to capture the results of venting operations, on HPCI, CS and RHR systems. (16831 and 16908) Implement performance based administrative controls to UT or vent HPCI, RHR and CS suction piping and CS discharge piping. (16907)</p>	<p>On January 12, 2015, Entergy docketed the certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel for the Vermont Yankee Nuclear Power Station (VYNPS). Generic Letter 2008-01 does not apply to permanently defueled facilities. As a result, these commitments were retired due to the permanent defueling of VYNPS.</p>
<p>16759, 16760, 16761, 16762</p>	<p>Letter to NRC dated January 11, 2007</p>	<p>Enhance the guidance for manually starting the Reactor Core Isolation Cooling (RCIC) System to provide provisions for monitoring Reactor Pressure Vessel (RPV) level. (16759) Develop guidance for depressurizing the RPV using the safety relief valves (SRVs) and for injection into the RPV with a portable pump. (16760) Develop guidance for injection into the hotwell and containment and makeup to the Condensate Storage Tank (CST) using a portable pump. (16761) Develop guidance regarding manually opening a containment vent line. (16762)</p>	<p>These commitments originated from VYNPS' response to NRC Order EA-02-026, Section II.B.5.b, which required Licensees to develop mitigating strategies related to the key safety functions of core cooling, containment, and SFP cooling. On January 12, 2015, Entergy docketed the certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel for the VYNPS. As a result, core damage is no longer possible and primary containment no longer performs a design function. Thus, the B.5.b commitments associated with starting the RCIC system, utilizing the SRVs, injecting into the RPV,</p>

VERMONT YANKEE NUCLEAR POWER STATION

COMMITMENT CHANGE SUMMARY REPORT

COMMITMENT NUMBERS	SOURCE(S)	ORIGINAL COMMITMENT(S)	PROPOSED CHANGE AND JUSTIFICATION
<p>16872, 16766, 16767, 16768, 16974, 16975, 16977, 16978, 16980, 16981, 16982</p>	<p>Letters to the NRC dated January 22, 1990, December 11, 2001, January 25, 2007, and November 12, 2014</p>	<p>Update Generic Letter (GL) 89-13 Program document(s) to require inspection and cleaning of the RHR heat exchangers and eliminate periodic testing. (16872) Perform inspection and cleaning of the Spent Fuel Pool Cooling (SFPC) heat exchangers every 3 years with an allowed +/- 25% tolerance. (16766) Perform eddy current testing of the SFPC heat exchangers every 6 years with an allowed +/- 25% tolerance. (16767) Perform monitoring of the Residual Heat Removal Service Water (RHRSW) pump motor coolers quarterly with an allowed +/- 25% tolerance. (16768) Perform water and substrate sampling annually to detect the presence of both asiatic clams and zebra mussels. If sampling detects their presence, system chlorination or an equally effective treatment program will be instituted. (16974) Add the four reactor recirculation units and the four RHRSW motor coolers to existing equipment monitoring programs. (16975) Perform cleaning and inspection of Reactor Building Closed Cooling Water heat exchangers</p>	<p>injection into the hotwell and containment, providing makeup to the CST, and opening a containment vent were retired and reclassified as historical, because the applicable systems, structures and components performance requirements regarding core cooling and primary containment were no longer required in the defueled state.</p> <p>The purpose of the GL 89-13 Program was to ensure the service water system could perform its required safety functions. On January 12, 2015, Entergy docketed the certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel for the VYNPS and has implemented Amendment 262 to the Renewed Facility Operating License, which relaxed the requirements for when secondary containment is required to be operable. As a result of these changes, the components cooled by service water no longer serve a safety related function including that performed by the SFPC heat exchangers. Therefore, the GL 89-13 program will no longer be maintained including periodic inspection and testing of the SFPC heat exchangers and piping. The GL 89-13 Program will no longer be maintained. Thus, these commitments were retired and reclassified as historic.</p>

VERMONT YANKEE NUCLEAR POWER STATION

COMMITMENT CHANGE SUMMARY REPORT

COMMITMENT NUMBERS	SOURCE(S)	ORIGINAL COMMITMENT(S)	PROPOSED CHANGE AND JUSTIFICATION
16844, 16845, 16865, 16867, 16956, 16957	Letters to the NRC dated November 15, 1996, March 13, 1997, May 27, 1999, and November 14, 2000	<p>once per cycle. (16977)</p> <p>Perform cleaning and inspection of Emergency Diesel Generator (EDG) jacket, lube oil and after coolers as necessary when a preventive maintenance overhaul is performed on the EDGs. (16978)</p> <p>Perform heat transfer performance testing of Reactor Recirculation Unit (RRU) 7 and RRU 8. Not to exceed once every three years. (16980)</p> <p>Maintain the service water valve inspection program. (16981)</p> <p>Identify locations in the service water system that may be susceptible to erosion and silting. Perform appropriate inspection of these locations so that corrective action can be taken. (16982)</p>	
		<p>Review exceptions to the applicable Joint Owners Group (JOG) Phase 2 and 3 results, in accordance with VYNPS' Program for managing regulatory commitments. (16844)</p> <p>Implement the results of the JOG Program Phases 2 and 3. (16845)</p> <p>Revise the Motor-Operated Valve (MOV) Program Procedure to: (1) Establish a requirement to complete operability evaluations prior to returning components back to service following maintenance or testing activities, (2) Establish the criteria for the initial evaluations and a time frame for completing formal calculations and (3) Establish the method for tracking completion of revised MOV calculations. (16865)</p> <p>Revise applicable MOV calculations to</p>	<p>On January 12, 2015, VYNPS docketed the certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel. The purpose of the MOV Program was to perform periodic verification of the capability of safety-related MOVs to perform their safety functions consistent with the current licensing bases of VYNPS. No MOVs are required to perform a safety function in the defueled state. Thus, these commitments were retired and reclassified as historic.</p>

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COMMITMENT CHANGE SUMMARY REPORT

COMMITMENT NUMBERS	SOURCE(S)	ORIGINAL COMMITMENT(S)	PROPOSED CHANGE AND JUSTIFICATION
		incorporate an application factor of 0.9 per Limitorque Technical Update 98-01. (16867) Implement NRC GL 96-05 MOV Periodic Verification Program. (16956) Incorporate the MOV JOG Program recommendations. (16957)	