



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 20, 2016

Vice President, Operations
Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
P.O. Box 250
Governor Hunt Road
Vernon, VT 05354

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION – EVALUATION OF
10 CFR 50.54(p)(2) CHANGES TO THE SECURITY PLANS

Dear Sir or Madam:

By letters dated April 1, 2015; June 24, 2015; and September 23, 2015 (Agencywide Documents Access and Management System Accession Nos. ML15098A468, ML15182A236, and ML15273A364, respectively), Entergy Nuclear Operations, Inc. submitted changes to the Physical Security Plan (PSP), Security Training and Qualification Plan (T&QP) and Safeguards Contingency Plan, Revisions 15-17, for Vermont Yankee Nuclear Power Station (VY), under the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.54(p)(2).

The U.S. Nuclear Regulatory Commission staff has completed its review of the VY's PSP, Security T&QP and Safeguards Contingency Plan, Revisions 15-17. A copy of the staff's evaluation is enclosed.

Please contact me at (301) 415-4125 or by e-mail at James.Kim@nrc.gov, if you have any questions on this issue.

Sincerely,

A handwritten signature in cursive script that reads "James Kim".

James Kim, Project Manager
Plant Licensing Branch IV-2 and Decommissioning
Transition branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure:
Staff Evaluation

cc w/encl: Distribution via Listserv

STAFF EVALUATION OF 10 CFR 50.54(p)(2)
CHANGES TO THE SECURITY PLANS
ENTERGY NUCLEAR OPERATIONS. INC.
VERMONT YANKEE NUCLEAR POWER STATION
DOCKET NO. 50-271

1.0 INTRODUCTION

By letters dated April 1, 2015; June 24, 2015; and September 23, 2015 (Agencywide Documents Access and Management System Accession Nos. ML15098A468, ML15182A236, and ML15273A364, respectively), Entergy Nuclear Operations, Inc. (the licensee) submitted changes to the Physical Security Plan (PSP), Security Training and Qualification Plan (T&QP), and Safeguards Contingency Plan, Revisions 15-17, for Vermont Yankee Nuclear Power Station (VY), under the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.54(p)(2). The enclosures to the letters contain Safeguards Information and have been withheld from public disclosure.

2.0 REGULATORY EVALUATION

The review of the licensee's security plans was conducted consistently with the applicable requirements of 10 CFR Part 73, "Physical Protection of Plants and Materials," as well as the guidance contained within the Office of Nuclear Security and Incident Response (NSIR) Procedure LIC 800, "Security Review Procedure for Title 10 of the *Code of Federal Regulations*, Part 50.54(p)(2) Security Plan Changes;" and the U.S. Nuclear Regulatory Commission (NRC)-endorsed Nuclear Energy Institute (NEI) documents: NEI 03-12, "Template for Security Plans," Revision 7 and NEI 11-08, "Guidance on Submitting Security Plan Changes," Revision 0, as appropriate.

The regulations in 10 CFR 50.54(p)(2) state, in part, that the licensee may make changes to the plans without prior Commission approval if the changes do not decrease the safeguards effectiveness of the security plans. The licensee must submit a report to the NRC containing the description of each change, within 2 months after changes are made.

The NRC staff's review consisted of determining whether the licensee's changes did not decrease the safeguards effectiveness of the Commission-approved security plans, and whether the licensee properly evaluated the changes as required by the regulations.

3.0 TECHNICAL EVALUATION

The NRC staff compared the following changes with the previous version of the VY PSP, Security T&QP and Safeguards Contingency Plan, Revisions 15-17, and referred to the guidance documents listed above in Section 2.0.

Enclosure

For Revisions 15-17 of the security plans, the licensee utilized NEI 11-08, Revision 0, as guidance to make the following changes¹: Revision 15 revised the security equipment used at the site, and removed Part 26 Subpart I, "Managing Fatigue," from the security plan and various reactor terms associated with an operating reactor. Revision 16 revised the response force numbers that were documented in the previous revision. Revision 17 identified the use of additional security delay features at the site, the use of a new diesel, and revised the response force numbers.

The NSIR and Region I staff conducted a site visit to VY on June 16 and 17, 2015. The purpose of the site visit was to review the current and future security plans as VY progresses through decommissioning. Further, during the week of August 3-7, 2015, the NSIR staff accompanied Region I physical security inspectors on an inspection at VY. During the inspection, a sampling was completed by the inspection team in the area of equipment performance, tests, and maintenance, protective strategy evaluation, and target set review. Also during the inspection, the licensee performance tested critical responder timelines and completed a tabletop exercise.

There were no issues of concern identified during the staff's review, including the site visit and inspection.

Resolution: This review is closed.

4.0 CONCLUSION

The NRC staff determined that the reported changes were implemented consistent with the provisions of 10 CFR 50.54(p).

The NRC staff determined that the licensee properly concluded that the reported changes did not result in a decrease in safeguards effectiveness of their security plans and recommends no further regulatory actions.

The effectiveness of the implementation of this revision is subject to future NRC review and inspection.

Principal Contributor: Vince Williams, NSIR/MWSB

¹ This is a generalized summary listing of the changes since specific information is Safeguards Information.

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Sincerely,

/RA/

James Kim, Project Manager
Plant Licensing Branch IV-2 and Decommissioning
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*via memo dated 12/14/2015

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