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John W. Boyle
Director, Nuclear Decommissioning

10 CFR 50.82(a)(7)

BVY 17-028

August 28, 2017

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

SUBJECT: Notification of Schedule Change for Preparations for Dismantling and
Decontamination
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

- REFERENCES:**
1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Post-Shutdown Decommissioning Activities Report," BVY 14-078, dated December 19, 2014 (ML14357A110)
 2. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Application for Order Consenting to Direct and Indirect Transfers of Control of Licenses and Approving Conforming License Amendment and Notification of Amendment to Decommissioning Trust Agreement," BVY-17 005, dated February 9, 2017 (ML17045A140)
 3. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Decommissioning Funding Status Report per 10 CFR §50.75(f)(1) and 10 CFR 50.82(a)(8)(v) – Entergy Nuclear Operations, Inc.," CNRO-2017-00009, dated March 31, 2017 (ML17093A926)
 4. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Notification of Schedule Change for Dry Fuel Loading Campaign," BVY 17-013, dated April 12, 2017 (ML17104A050)

Dear Sir or Madam:

In accordance with 10 CFR 50.82(a)(7), Entergy Nuclear Operations, Inc. (ENO) is hereby notifying the NRC of a significant change to the Vermont Yankee Nuclear Power Station (VYNPS) Post-Shutdown Decommissioning Activities Report (PSDAR).

On December 19, 2014, ENO submitted the VYNPS PSDAR pursuant to 10 CFR 50.82(a)(4) (Reference 1). In Table 2.1 of the PSDAR, ENO described the planned decommissioning schedule, with Preparations for Dismantling and Decontamination (D&D) planned to begin in

2068 and end in 2069.¹ As stated in PSDAR Section 2.1.3, during the Preparations for D&D period, ENO anticipated that it would reactivate site services, perform engineering and decommissioning planning analyses, characterize the site, and assemble a decommissioning management organization. Other anticipated activities during this period include the development of work plans, specifications and procedures. In the Site-Specific Decommissioning Cost Estimate accompanying the PSDAR, ENO estimated in Table 2 that the total Period 3 costs for Preparations for D&D activities would be approximately \$80 million.

On February 9, 2017, ENO submitted an application on behalf of itself, Entergy Nuclear Vermont Yankee, LLC (ENVY) (to be known as "NorthStar Vermont Yankee, LLC" or "NorthStar VY"), and NorthStar Nuclear Decommissioning Company, LLC (NorthStar NDC), requesting that the NRC consent to direct and indirect transfers of control of the Renewed Facility Operating License No. DPR-28 for VYNPS, as well as the general license for the VYNPS Independent Spent Fuel Storage Installation (ISFSI) for the purpose of implementing expedited decommissioning at VYNPS (Reference 2).

In anticipation of the completion of the transaction, and to facilitate commencing D&D activities potentially as early as 2019, ENVY is planning to perform certain activities in preparation for D&D in 2017 and 2018, rather than in 2068 and 2069, as described in the PSDAR. The scope of work constitutes a portion of the Preparations for D&D work described in the PSDAR and includes preparation of engineering analyses to support decommissioning activities, design of specialty tooling required for reactor vessel segmentation, purchase of long lead time materials, development of procedures, and modifications/upgrades to the rail spur located outside the Protected Area portion of the site. The cost to ENVY for this D&D preparation work is approximately \$30 million.

By letter dated March 31, 2017, ENO submitted the annual Decommissioning Funding Status Report for Vermont Yankee in accordance with 10 CFR 50.75(f)(1) and 10 CFR 50.82(a)(8)(v) (Reference 3). Attachment 15 provided an updated annual cash flow analysis demonstrating that the VYNPS nuclear decommissioning trust fund is sufficiently funded for all license termination activities and certain spent fuel management activities as allowed by an approved exemption. The analysis included adjustments to the decommissioning schedule and cash withdrawals reflecting changes associated with the dry fuel storage loading campaign schedule, contingent upon certain regulatory approvals, as previously described in Reference 4, and the Preparations for D&D work described above. Including these updates, the analysis identified an excess of \$196.6 million after completion of license termination and the spent fuel management activities that will be funded by the trust fund.

This submittal contains no new regulatory commitments. Should you have any questions concerning this letter, please contact Mr. Coley Chappell at 802-451-3374.

Sincerely,



JWB/ccc/shr

¹ Subject to the commitments regarding the commencement of radiological decommissioning in the December 23, 2013 Settlement Agreement as described in PSDAR Section 1.2.

cc: Mr. Daniel H. Dorman
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