



Entergy Nuclear

Vermont Yankee
P.O. Box 250
320 Governor Hunt Road
Vernon, VT 05354-9766
Tel 802 451 3102
Fax 802 451 3001

Christopher J. Wamser
Site Vice President - VY

January 20, 2012

Elizabeth H. Miller
Commissioner, Department of Public Service
Chair, Vermont State Nuclear Advisory Panel
112 State Street, Drawer 20
Montpelier, VT 05620-2601

Re: Construction Office Building Well Testing

Dear Commissioner Miller:

I write in response to your December 27, 2011 letter in which you reiterate the state's request to test the Construction Office Building ("COB") well for tritium and other radionuclides.

Most recently at the December 14, 2011 VSNAP meeting, Vermont Yankee reiterated that we are fully committed to protecting the health and safety of the public. Toward that end, Vermont Yankee tests for radionuclides using samples drawn from 63 wells on or near the site, including drinking water wells in Vermont and New Hampshire, as well as samples drawn from the Connecticut River. We have also worked extensively with our hydrogeologic experts to undertake a very thorough and careful analysis of water movement beneath the site as well as the risks and potential benefits of further COB well testing.

It is important to recognize that the Nuclear Regulatory Commission ("NRC"), the agency responsible for protecting the public's health and safety from exposure to radionuclides, concluded in its September 20, 2011 Groundwater Inspection Monitoring Report that "there continues to be reasonable assurances that public health and safety has not been, nor is expected to be, adversely affected by the current on-site groundwater contamination plume condition." The NRC also concluded that Vermont Yankee had "effectively evaluated the contaminated groundwater with respect to off-site effluent release limits; properly evaluated the resultant radiological impact to the public's health and safety; and complied with all applicable regulatory requirements and standards pertaining to radiological effluent monitoring, dose assessment and radiological evaluation."

Further COB well testing is therefore, to quote the NRC's spokesperson Neal Sheehan, "not an issue of regulatory import, since there are no public or worker safety impacts." To the extent that you request such testing to collect additional information, traditional well sampling methods would require withdrawing significant quantities of water from the well, which could pose a risk

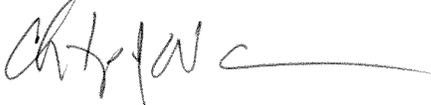
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of contaminating the bedrock aquifer. We do not see how the incremental value of the results from such testing would outweigh the risk, particularly when there is already extensive testing information available from numerous other wells on- and off-site (including drinking water wells). While testing of the COB well by grab sampling, as your letter suggests, would limit the risk, vertical flow within the well and insertion of the sampling equipment would cause mixing within the well column and would not tell us the location of tritium, if any, within that column. Such testing would consequently not add meaningful new information about the nature and extent of tritium in the subsurface or add to the understanding of groundwater movement downgradient of the Plant.

More importantly, further testing of the COB well would not provide a basis for changing Vermont Yankee's groundwater monitoring program, which already accounts for the October 2010 COB well test mentioned in your letter. After reviewing our experts' analysis that provides the basis for that program, the NRC found, as noted above, that our groundwater program already "comple[s] with all applicable regulatory requirements and standards pertaining to radiological effluent monitoring, dose assessment and radiological evaluation." Given all of these current circumstances, it remains our considered judgment that further COB well testing would at best provide ambiguous results without practical value and is therefore inappropriate.

Thank you for allowing us the opportunity to respond to the concerns expressed in your letter.

Sincerely,



Christopher J. Wamser

cc: VSNAP Panel Members
Commissioner Harry Chen
Deputy Commissioner Justin Johnson