Entergy

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Christopher J. Wamser
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BVY 12-021

March 30, 2012

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

SUBJECT: Entergy's Answer to the March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents (Order Number EA-12-050)
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

REFERENCE: (1) NRC letter to Entergy, Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents, dated March 12, 2012, NVY 12-019

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective Order in Reference 1 entitled Order Modifying Licenses with Regard to Reliable Hardened Containment Vents (Effective Immediately) ("Order") to, inter alia, Entergy Nuclear Operations, Inc. (Entergy). The Order states that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC had decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically with respect to this Order, the NRC has decided to require BWRs with Mark I and Mark II containments to take certain actions to ensure the operability of reliable hardened vent systems to remove decay heat and maintain control of containment pressure following events that result in loss of active containment heat removal capability or prolonged Station Blackout (SBO). Specific requirements for reliable hardened vents are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

The Order also states that the Commission also intends to decide, after receipt of a Policy Paper from the NRC staff, whether to also require installation of filtration systems on these hardened vent systems. Order at Section II, p. 5. The Policy Paper is scheduled to be delivered by July 2012. The full extent of work necessary to implement this Order cannot be known until after Commission action after review of the staff's July 2012 Policy Paper.

Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, Entergy hereby submits its answer to the Order. Entergy consents to the Order and does not request a hearing. Based on information currently available, Entergy has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, Entergy has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever is earlier. Entergy will provide further responses as required by Section IV.C in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of Entergy to comply with the specific compliance deadline dates based on the probable availability of that guidance, Entergy's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

There are no new commitments contained in this submittal.

Should you have any questions regarding this answer, please contact Mr. Robert J. Wanczyk at (802) 451-3166.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 30, 2012.

Sincerely,

[CJW/JMD]

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