



Entergy Nuclear Operations, Inc.
140 Hamilton Avenue
White Plains, New York 10601
Tel: 914-272-3370

John F. McCann
Vice President, Nuclear Safety,
Emergency Planning and Licensing

ENOC-11-00007

March 31, 2011

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

SUBJECT: Financial Test for Decommissioning Funding Parent Guarantees
For the Year Ending December 31, 2010
Vermont Yankee Nuclear Power Station
Docket: 50-271
License: DPR-28
Big Rock Point ISFSI
Docket Nos. 50-155 and 72-043
License Nos. DPR-6 and GLSF-16

STATE OF VERMONT
DEPT. OF PUBLIC SERVICE
MONTPELIER, VT.
05620-2601
2011 APR -6 A 11:58

REFERENCES:

1. Entergy letter BVY-10-008 "Decommissioning Funding Assurance Documentation" dated January 28, 2010 (ML100470701)
2. Entergy letter BVY-10-0020 "2009 Financial Test for VY Decommissioning Funding Parent Guarantee" dated March 30, 2010 (ML100970035)

Dear Sir or Madam:

Recital 8 of the Vermont Yankee (VY) parent company guarantee requires the guarantor to submit certain financial documents to the NRC annually within 90 days of the close of the parent guarantor's fiscal year (December 31, 2010). Use of the parent company guarantee for VY was initially established by Reference 1 for 2009, based upon financial data for the year ending December 31, 2008. Updated information based upon financial data for the year ending December 31, 2009, was provided via Reference 2.

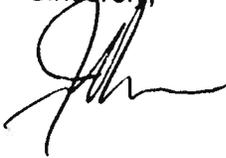
The NRC staff has recently emphasized that, in accordance with 10 CFR Part 30, Appendix A, Section II.A.2(iv), the financial test is to include assessments based upon "the amount of decommissioning funds being assured by a parent company for the total of all reactor units or parts thereof" for which parent guarantees are being provided. As such, the financial test herein includes a separately approved \$5 million parent guarantee for Big Rock Point Independent Spent Fuel Storage Installation (ISFSI) in addition to the \$40 million VY guarantee, for a combined test total of \$45 million.

These documents support the continued use of a parent company guarantee to provide financial assurance of decommissioning funds for Vermont Yankee Nuclear Power Station and Big Rock Point ISFSI, pursuant to 10 CFR 50.75(e)(1)(iii)(B).

This submittal contains no new regulatory commitments.

Please contact Bryan Ford at (601) 368-5516 if you need additional information concerning this submittal.

Sincerely,

A handwritten signature in black ink, appearing to be 'JFM', written over a horizontal line.

JFM/BSF/LAE

Attachments:

1. Entergy Corporation Parent-Guarantee of Funds for Decommissioning: letter from Chief Financial Officer to Demonstrate Financial Assurance. (3 pages)
2. Independent Accountants' Report on Applying Agreed Upon Procedures. (1 page)

cc: next page

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cc:

USNRC Region I Administrator
USNRC Region III Administrator
USNRC Project Manager, VY
USNRC Project Manager, BRP
USNRC Resident Inspector, Vermont Yankee

Ms. Elizabeth Miller, Commissioner
VT Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05620

Mr. L. Jager Smith, P.E.

ENOC-11-00007
Attachment 1

**Entergy Corporation Parent-Guarantee of Funds for Decommissioning: letter from Chief
Financial Officer to Demonstrate Financial Assurance. (3 pages)**



ENTERGY CORPORATION
 P.O. BOX 61000
 NEW ORLEANS, LA 70161
 (504) 576-6106

LEO P. DENAULT
 EXECUTIVE VICE PRESIDENT AND
 CHIEF FINANCIAL OFFICER

March 21, 2011

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

Subject: Entergy Corporation Parent – Guarantee of Funds for Decommissioning: Letter from Chief Financial Officer to Demonstrate Financial Assurance

I am the chief financial officer of Entergy Corporation, 639 Loyola Avenue, New Orleans, LA 70113, a corporation. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in 10 CFR Part 50.

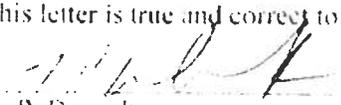
This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 50, the decommissioning of the following facility owned or operated by a subsidiary of this firm. The current cost estimate or certified amount for decommissioning, and the amount being guaranteed, are shown for the facility:

<u>Name of Facility</u>	<u>Location of Facility</u>	<u>Current Cost Estimate</u>	<u>Amount Being Guaranteed</u>
Vermont Yankee Nuclear Power Station License No. DPR-28	Vernon, VT	\$564,245,876	\$40,000,000
Big Rock Point Independent Spent Fuel Storage Installation License Nos. DPR-06, SFGL-16	Charlevoix, MI	\$ 2,739,003	\$ 5,000,000

Entergy Corporation is required to file a Form 10K with the U.S. Securities and Exchange Commission for the latest fiscal year.

This fiscal year of Entergy Corporation ends on December 31st. The figures for the following items (Financial Test II) marked with an asterisk are derived from this Entergy Corporation's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended December 31, 2010.

I hereby certify that the content of this letter is true and correct to the best of my knowledge.


 Leo P. Denault
 Executive Vice President and Chief Financial Officer

2 23 11
 Date

FINANCIAL TEST: ALTERNATIVE II
(10 CFR Part 30 App. A. Section II A.2.)
Entergy Corporation Parent Guarantee of Funds For Decommissioning
Dollars in thousands

1. Guaranteed amount for Vermont Yankee Nuclear Power Station, License No. DPR-28 and Big Rock Point Independent Spent Fuel Storage Installation, Licenses Nos. DPR-06, SFGL-16 (total cost of all cost estimates should be stated in paragraphs above) \$45,000

 2. Current rating of most recent bond issuance of this firm (see NOTE/ below)

Rating BBB corporate credit rating as of January 24, 2011

Name of rating service Standard & Poor's

 3. Date of issuance of bond (See NOTE/ below)

 4. Date of maturity of bond (See NOTE/ below)

 - *5. Tangible net worth** (if any portion of estimates for decommissioning is included in total liabilities on your firm's financial statements, you may add the amount of that portion to this line) \$8,429,966

 - *6. Total assets in United States (required only if less than 90 percent of firm's assets are located in the United States)
- | | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| 7. Is line 5 at least \$10,000? | X | |
| 8. Is line 5 at least 6 times line 1? | X | |
| 9. Are at least 90 percent of firm's assets located in the United States? If not, complete line 10. | X | |
| 10. Is line 6 at least 6 times line 1? | N/A | |
| 11. Is the rating specified on line 2 "BBB" or better (if issued by Standard & Poor's) or "Baa" or better (if issued by Moody's)? | X | |

NOTE/ Entergy Corporation does not have any recent bond issuances. Ratings supplied above are the current credit ratings from the indicated rating agency.

* Denotes figures derived from financial statements.

** Tangible net worth is defined as net worth minus goodwill, patents, trademarks, and copyrights.

**RECONCILING SCHEDULE
ENTERGY CORPORATION
YEAR ENDED DECEMBER 31, 2010
Dollars in thousands**

<u>Line Number in CFO's Letter</u>	<u>Per Financial Statements</u>	<u>Recon- ciling Items</u>	<u>Per CFO's Letter</u>
Total Assets	\$38,685,276		
Less: Total Current Liabilities	(2,776,249)		
Less: Total Non-Current Liabilities	(27,101,889)		
Less: Goodwill	<u>(377,172)</u>		
Tangible Net Worth	\$8,429,966		\$8,429,966

ENOC-11-00007
Attachment 2

Independent Accountants' Report on Applying Agreed Upon Procedures (1 page)



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Suite 4200
701 Poydras Street
New Orleans, LA 70139 4200
USA

Tel: +1 504 581 2727
Fax: +1 504 561 7293
www.deloitte.com

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors
Entergy Corporation
New Orleans, Louisiana

We have performed the procedures enumerated below, which were agreed to by Entergy Corporation (the "Company"), solely to assist the Company in connection with the Company's and the U.S. Nuclear Regulatory Commission's ("NRC") evaluation of the Company's compliance with the requirements specified in Appendix A, Section II A.2 to Part 30 of 10 CFR, the Financial Test: Alternative II (the "Financial Test") as of December 31, 2010, included in the accompanying letter from the Chief Financial Officer of the Company dated March 21, 2011 to the NRC. The Company's management is responsible for compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, as adopted by the Public Company Accounting Oversight Board (United States). The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

It should be understood that (1) we make no representations regarding the Company's determination and presentation of non-GAAP measures (such as tangible net worth), and (2) the non-GAAP measure presented may not be comparable to similarly titled measures reported by other companies. However, the following procedures were applied to the attached Schedules on pages 2, 3, and 4 of Appendix A as indicated with respect to the symbols explained below.

- A. We compared these amounts to the Company's audited consolidated financial statements for the year ended December 31, 2010 and found such amounts to be in agreement.
- B. We compared the "Tangible Net Worth" amount as shown in the column "Per CEO's Letter" included in the Reconciling Schedule on page 4 of Appendix A to the "Tangible net worth" amount presented on line 5 of the Financial Test: Alternative II Schedule on page 2 of Appendix A and found such amounts to be in agreement.
- C. We proved the arithmetic accuracy of the statement and noted no exception.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the board of directors and management of the Company and the NRC, and is not intended to be and should not be used by anyone other than these specified parties.

Deloitte & Touche LLP

March 25, 2011



ENTERGY CORPORATION
 P O BOX 6100
 NEW ORLEANS, LA 70161
 (504) 576-6106

LEO P. DENAULT
 EXECUTIVE VICE PRESIDENT AND
 CHIEF FINANCIAL OFFICER

March 21, 2011

ATTN: Document Control Desk
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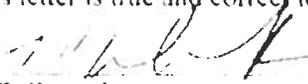
This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 50, the decommissioning of the following facility owned or operated by a subsidiary of this firm. The current cost estimate or certified amount for decommissioning, and the amount being guaranteed, are shown for the facility:

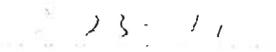
<u>Name of Facility</u>	<u>Location of Facility</u>	<u>Current Cost Estimate</u>	<u>Amount Being Guaranteed</u>
Vermont Yankee Nuclear Power Station License No. DPR-28	Vernon, VT	\$564,245,876	\$40,000,000
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Entergy Corporation is required to file a Form 10K with the U.S. Securities and Exchange Commission for the latest fiscal year.

This fiscal year of Entergy Corporation ends on December 31st. The figures for the following items (Financial Test II) marked with an asterisk are derived from this Entergy Corporation's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended December 31, 2010.

I hereby certify that the content of this letter is true and correct to the best of my knowledge.


 Leo P. Denault
 Executive Vice President and Chief Financial Officer


 Date

FINANCIAL TEST: ALTERNATIVE II
(10 CFR Part 30 App. A, Section II A.2.)
Entergy Corporation Parent Guarantee of Funds For Decommissioning
Dollars in thousands

- | | | |
|-----|--|----------------------|
| 1. | Guaranteed amount for Vermont Yankee Nuclear Power Station, License No. DPR-28 and Big Rock Point Independent Spent Fuel Storage Installation, Licenses Nos. DPR-06, SFGL-16 (total cost of all cost estimates should be stated in paragraphs above) | \$45,000 |
| 2. | Current rating of most recent bond issuance of this firm (see NOTE/ below) | |
| | Rating <u>BBB corporate credit rating as of January 24, 2011</u> | |
| | Name of rating service <u>Standard & Poor's</u> | |
| 3. | Date of issuance of bond (See NOTE/ below) | |
| 4. | Date of maturity of bond (See NOTE/ below) | |
| *5. | Tangible net worth** (if any portion of estimates for decommissioning is included in total liabilities on your firm's financial statements, you may add the amount of that portion to this line) | \$8,429,966 <u>B</u> |
| *6. | Total assets in United States (required only if less than 90 percent of firm's assets are located in the United States) | |
| | | <u>Yes</u> <u>No</u> |
| 7. | Is line 5 at least \$10,000? | X <u>C</u> |
| 8. | Is line 5 at least 6 times line 1? | X <u>C</u> |
| 9. | Are at least 90 percent of firm's assets located in the United States? If not, complete line 10. | X |
| 10. | Is line 6 at least 6 times line 1? | N/A |
| 11. | Is the rating specified on line 2 "BBB" or better (if issued by Standard & Poor's) or "Baa" or better (if issued by Moody's)? | X |

NOTE/ Entergy Corporation does not have any recent bond issuances. Ratings supplied above are the current credit ratings from the indicated rating agency.

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** Tangible net worth is defined as net worth minus goodwill, patents, trademarks, and copyrights.

**RECONCILING SCHEDULE
ENTERGY CORPORATION
YEAR ENDED DECEMBER 31, 2010
Dollars in thousands**

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Total Assets	\$38,685,276	A	
Less: Total Current Liabilities	(2,776,249)	A	
Less: Total Non-Current Liabilities	(27,101,889)	A	
Less: Goodwill	<u>(377,172)</u>	A	
Tangible Net Worth	\$8,429,966	C	\$8,429,966 B