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December 6, 2012

Ms. Cindy Bladey
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Vermont Public Service Department comments for Docket ID 2012-0078
on Vermont Yankee's proposed change of steam dryer inspection
frequency

Reference: Letter, Entergy Nuclear Operations, Inc. to USNRC, Technical
Specifications Proposed Change 296, Supplement 1 Response to Request
for Additional Information Vermont Yankee Nuclear Power Station,
Docket No. 50-271, License No. DPR-28, October 3, 2012

Dear Ms. Bladey:

The Vermont Public Service Department (Department) hereby submits its
comments to Vermont Yankee's request to change the inspection frequency of the
steam dryer per Operating License Condition 3.S.

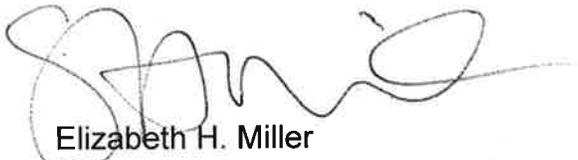
On December 22, 2011, Vermont Yankee (VY) submitted to NRC a proposed
change to the steam dryer inspection frequency that would extend it from every two
operating cycles to every seven operating cycles. As noted in the referenced letter
above, NRC reviewed the technical justification provided by VY for the reduction in
inspection frequency (every seven (7) cycles) and determined it was not sufficient and
responded to VY with a request for additional information (RAI). VY responded to the
(RAI) providing a technical justification for a three (3) cycle inspection frequency of the
steam dryer. The justification provided by VY included that five (5) successive steam
dryer inspections have been completed since 2004 in refueling outages 24, 25, 26, 27,
28, and an inspection of the DC-V4C weld area in the most recent RFO 29 back in
November 2012 demonstrating that flaw indications caused by IGSCC have stabilized
or arrested, and there is no evidence of crack growth post EPU for all other flaws. Thus,
VY is proposing that the next inspection of the steam dryer will be during RFO 31, and
every three (3) cycles thereafter.



The Department is concerned at the request for a three-cycle inspection protocol and does not feel NRC should accept it, particularly if the inspection of the steam dryer in RFO 31 were to reveal any new cracks or propagation of existing flaws beyond the acceptable growth rate.

The Department appreciates the opportunity to provide comments to the NRC. Please feel free to contact me if you have any questions.

Sincerely,



Elizabeth H. Miller
Commissioner

cc: Mr. Richard V. Guzman, Project Manager
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