



Entergy Nuclear Operations, Inc.
Vermont Yankee
320 Governor Hunt Rd
Vernon, VT 05354
Tel 802 257 7711

EM

Christopher J. Wamser
Site Vice President

BVY 11-080

December 8, 2011

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

STATE OF VERMONT
DEPT. OF PUBLIC SERVICE
MONTPELIER, VT.
05620-2601

2011 DEC 12 A 9:51

SUBJECT: NRC Bulletin 2011-01 - Response to Request for Additional Information
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

- REFERENCE:
1. Letter, Vermont Yankee to USNRC, "60 Day Response to NRC Bulletin 2011-01," BVY 11-049, dated July 11, 2011
 2. Letter, USNRC to Vermont Yankee, "Vermont Yankee Nuclear Power Station - Request for Additional Information Regarding 60-Day Response to Bulletin 2011-01, "Mitigating Strategies" (TAC No. ME6496)," NRY 11-091, dated November 9, 2011

Dear Sir or Madam:

In Reference 1, Vermont Yankee provided the 60 day responses to NRC Bulletin 2011-01. In Reference 2, the NRC provided a request for information (RAI). Attachment 1 provides responses to each of the RAI questions.

There are no new regulatory commitments being made in this submittal.

If you have any questions on this transmittal, please contact Mr. Robert Wanczyk at 802-451-3166.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on December 8, 2011.

Sincerely,

[CJW/JMD]

Attachment : (1) NRC Bulletin 2011-01 - Response to Request for Additional Information

cc: Mr. William M. Dean
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. James S. Kim, Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O8C2A
Washington, DC 20555

USNRC Resident Inspector
Entergy Nuclear Vermont Yankee, LLC
320 Governor Hunt Rd
Vernon, Vermont 05354

Ms. Elizabeth Miller, Commissioner
VT Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05620-2601

Attachment 1

Vermont Yankee Nuclear Power Station

NRC Bulletin 2011-01

Response to Request for Additional Information

NRC Bulletin 2011-01 - Response to Request for Additional Information

RAI 1:

Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. The NRC staff could not determine if you performed activities to ensure that these devices will be functional when needed.

Response:

The only monitor nozzles, spray nozzles or similar devices that were procured to support the mitigating strategies were monitor nozzles which Vermont Yankee (VY) credits in implementing the B.5.b strategies. VY entered the lack of a formal test of the B.5.b monitor nozzles into the Corrective Action Program. VY performed a successful test of the B.5.b monitor nozzles on November 25, 2011 and will perform an annual flow test of the nozzles to ensure their functionality. This will include an inspection of the general integrity of the monitor nozzles in accordance with the vendor recommendations.

RAI 2:

Identify the minimum inventory frequency for equipment needed for the mitigating strategies not specifically identified in response to the bulletin. Alternatively, describe the inventory frequency for firefighter turnout gear and instruments needed to support the mitigating strategies.

The bulletin requested that each licensee describe in detail the controls for assuring equipment supporting the mitigating strategies will be available when needed. Firefighter turnout gear, tools, and instruments are generally needed to implement the mitigating strategies. The NRC staff noted that your response included inventory of tools, but could not determine if firefighter turnout gear and instruments are inventoried.

Response:

The inventory frequency for fire brigade turnout gear and other fire fighting equipment / instruments located in the fire brigade rooms is provided below. The inventory frequency for other B.5.b related instruments needed to support the mitigating strategies was provided in the 60 day response.

Equipment	Inventory Requirements	Periodicity	Basis
Fire fighting turnout gear inspection (Main Fire Brigade Room)	Check personal turnout gear for proper inventory, cleanliness, physical damage and general integrity / material condition (stitching, wristlets, reflective material, labels, hook and loop, liner)	Annual	NFPA 1851
Main Fire Brigade Room Equipment	Ensure all equipment on the inventory form is present and functional where applicable.	Monthly	Judgment

Equipment	Inventory Requirements	Periodicity	Basis
Main Fire Brigade Room and Alternate Fire Brigade Room Equipment	Ensure all equipment on the inventory form is present and functional where applicable. Included in the alternate brigade room inventory is a check of the firefighter turnout gear for material condition.	Quarterly	Judgment
Plant Support Building Alternate Brigade Room Equipment	Ensure all equipment on the inventory form is present and functional where applicable. Included in the alternate brigade room inventory is a check of the firefighter turnout gear for material condition	Quarterly	Judgment

RAI 3:

Describe in detail the fire brigade training as it relates to all phases of the mitigating strategies.

The bulletin requested that each licensee describe in detail how configuration and guidance management, including training, is assured so that the strategies remain feasible. The safety evaluation documenting the NRC review of your response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026) states that the expectation for fire brigade training (Phase 1, B.1.1) includes accelerant-fed fires and coordinated fire response. Your response to the bulletin implies that fire brigade training is limited to pump operations.

Response:

Fire Brigade personnel are trained on the set up and operation of the B.5.b pump and the mitigation strategies biennially. This level of training is also included in initial Fire Brigade training.

Annually, the Fire Brigade conducts live fire training off-site at a dedicated live fire training facility. This live fire training has several scenarios that challenge the Brigade members to suppress Class "B" fires. The scenarios include multiple accelerant-fed (fuel) fires, fuel fires that have extended below grade, and fires both inside and outside buildings. The brigade also trains on the use of foam as an extinguishing agent for fuel fed fires.

The Fire Brigade training program includes lesson plans that discuss B.5.b mitigation strategies and use of fire fighting foam on oil fires. The training program also utilizes the NFPA "Fundamentals of Fire Fighter Skills" workbook. VY has a fire drill scenario that challenges the brigade with multiple fuel oil fires from a simulated aircraft impact.

All fire brigade members are trained on the National Incident Management System (NIMS). Additionally the Fire Brigade Leaders receive training on NIMS through FEMA.

Fire Brigade members practice a coordinated fire response with the Control Room staff and occasionally with offsite fire agencies during regularly scheduled fire drills and occasionally during plant emergency preparedness drills.

RAI 4:

Describe in detail how you ensure the availability of local law enforcement agencies relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies are relied upon for emergency response to a B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies as being relied upon to respond to a B.5.b event.

Response:

The following table provides information detailing how VY assures the availability of each local law enforcement agency (LLEA):

Off-Site Organization	Implementing document	Validation and Periodicity	Training/Familiarization Refresher / Periodicity
Vernon Police Dept. (Primary Response Agency)*	<ul style="list-style-type: none"> VY Physical Security Plan Sections 8 and 18 VY Procedure SPAD-LLEA-08103 Section 8.9 - Letter of Agreement 	Annual	<ul style="list-style-type: none"> Annual requirement to conduct LLEA meeting with VY Security Mgt. Annual Security Event based E-Plan Drills
Vermont State Police	<ul style="list-style-type: none"> VY Physical Security Plan Sections 8 and 18 VY Procedure SPAD-LLEA-08103 Section 8.9 - Letter of Agreement 	Annual	<ul style="list-style-type: none"> Annual requirement to conduct LLEA meeting with VY Security Mgt. Annual Security Event based E-Plan Drills
Windham County Sheriff's Department	<ul style="list-style-type: none"> VY Physical Security Plan Sections 8 and 18 VY Procedure SPAD-LLEA-08103 Section 8.9 - Letter of Agreement 	Annual	<ul style="list-style-type: none"> Annual requirement to conduct LLEA meeting with VY Security Mgt. Annual Security Event based E-Plan Drills
Vermont Homeland Security	<ul style="list-style-type: none"> VY Physical Security Plan Sections 8 and 18 VY Procedure SPAD-LLEA-08103 Section 8.9 - Letter of Agreement 	Annual	<ul style="list-style-type: none"> Annual requirement to conduct LLEA meeting with VY Security Mgt. Annual Security Event based E-Plan Drills

<p>Federal Bureau of Investigation</p>	<ul style="list-style-type: none"> • VY Physical Security Plan Sections 8 and 18 • VY Procedure SPAD-LLEA-08103 Section 8.9 - Letter of Agreement 	<p>Annual</p>	<ul style="list-style-type: none"> • Annual requirement to conduct LLEA meeting with VY Security Mgt. • Annual Security Event based E-Plan Drills
<p>New Hampshire State Police</p>	<ul style="list-style-type: none"> • VY Physical Security Plan Sections 8 and 18 • VY Procedure SPAD-LLEA-08103 Section 8.9 - Letter of Agreement 	<p>Annual</p>	<ul style="list-style-type: none"> • Annual requirement to conduct LLEA meeting with VY Security Mgt. • Annual Security Event based E-Plan Drills

* Vernon Police and VY Sec. Mgt will determine based on events, the additional LLEA resources required to respond to any event at VY.

All LLEA Letters of Agreement are reviewed annually, and updated as necessary each year by each of the individual agencies to ensure response capabilities are current.