



Entergy Nuclear Operations, Inc.
Vermont Yankee
320 Governor Hunt Road
Vernon, Vermont 05354
Tel: (802) 257-7711

Christopher J. Wamser
Site Vice President

BVY 12-071

October 26, 2012

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

REFERENCES:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (ML12054A735)
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Vermont Yankee. Reference 1 was immediately effective and directs Vermont Yankee to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms Vermont Yankee has received Reference 2 and is

A151
NRR

in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.
- Completion of conceptual design.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Vermont Yankee prior to startup from Refueling Outage (RFO-31) scheduled for Fall 2014.

This letter contains no new regulatory commitments.

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

I declare under penalty of perjury that the foregoing is true and correct;
Executed on October 26, 2012.

Sincerely,



CJW / JTM

cc list: (next page)

cc: Mr. William M. Dean
Regional Administrator
U. S. Nuclear Regulatory Commission, Region 1
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

U. S. Nuclear Regulatory Commission
Attn: Director, Office of Nuclear Reactor Regulation
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

USNRC Resident Inspector
Vermont Yankee
320 Governor Hunt Road
Vernon, Vermont 05354

U. S. Nuclear Regulatory Commission
ATTN: Richard V. Guzman
Mail Stop O8C2A
11555 Rockville Pike
Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission
ATTN: Robert J. Fretz Jr.
Mail Stop 4A15A
11555 Rockville Pike
Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission
ATTN: Robert L. Dennig
Mail Stop 10E1
11555 Rockville Pike
Rockville, MD 20852-2378

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

U. S. Nuclear Regulatory Commission
ATTN: Ms. Jessica A. Kratchman
Mail Stop 9D2
11555 Rockville Pike
Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission
ATTN: Ms. Eileen M. Mckenna
Mail Stop 10D5
11555 Rockville Pike
Rockville, MD 20852-2378