

VERMONT YANKEE NUCLEAR POWER CORPORATION

185 OLD FERRY ROAD, PO BOX 7002, BRATTLEBORO, VT 05302-7002
(802) 257-5271

SAFEGUARDS INFORMATION

March 18, 2002
BVY 02-15

U.S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
Mail Stop O-5 E7
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

U.S. Nuclear Regulatory Commission
Secretary
Office of the Secretary of the Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

- References: (a) Letter, USNRC to VYNPC, "Issuance of Order for Interim Safeguards and Security Compensatory Measures for Vermont Yankee Nuclear Power Station," (NVY 02-17), dated February 25, 2002
- (b) Letter, VYNPC to USNRC, "Request for Extension of Time to Submit an Answer or Request a Hearing," (BVY 02-16), dated March 18, 2002

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Response to Order for Interim Safeguards and Security Compensatory Measures**

By Reference (a) the U.S. Nuclear Regulatory Commission (NRC) issued an Order modifying the current operating license of the Vermont Yankee Nuclear Power Station to require compliance with specified interim safeguards and security compensatory measures as a result of the generalized high-level threat environment. NRC issued similar Orders to all operating nuclear power plant licensees.

This letter and attachment constitute Vermont Yankee Nuclear Power Corporation's (VY) response to the subject Order in accordance with 10 CFR 2.202. Except, with respect to the matter addressed in Reference (b), VY consents to the requirements of the Order.

Based on NRC Safeguards and Threat Advisories, VY immediately and prudentially implemented additional security measures following the terrorist events of September 11, 2001, to strengthen capabilities and readiness to respond to a potential attack. In addition, VY has conducted an extensive re-evaluation of its protective strategies, resources, facilities and equipment that support responses to

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security contingency events and has initiated certain enhancements, consistent with NRC's advisories, to supplement existing regulatory requirements.

The attachment to this letter provides VY's schedule for completing implementation of the specific, interim compensatory measures required by the Order. In several instances, full compliance with the specific actions has already been achieved, and these instances are identified in the attachment to this letter.

Upon receipt of the Order, VY immediately commenced implementation of the requirements in Attachment 2 to the Order. In addition, VY (1) has not identified any requirements of the Order with which it is unable to comply, (2) has not identified any required action as unnecessary, (3) has not identified any case where implementation of the Order's requirements would cause VY to be in violation of the provisions of any NRC regulation or the facility license, and (4) does not consider that implementation of the Order's requirements would adversely impact safe operation of the facility. However, as discussed in Reference (b), in one instance VY is unable to complete the necessary evaluations to determine what actions are appropriate and what is the appropriate schedule for implementation. For this reason, pending further analyses, VY will provide the responses directed by Order Conditions B.1, B.2 and C.1 for Interim Compensatory Measure B.2.a(2) by July 5, 2002.

The attachment to this letter contains safeguards information and, therefore, should be withheld from public disclosure subject to the provisions of NRC regulations.

If you have any questions on this transmittal, please contact Mr. Don M. Leach at (802) 258-4234.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Michael A. Balduzzi

Senior Vice President and Chief Nuclear Officer

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STATE OF VERMONT)
)ss
 WINDHAM COUNTY)



Then personally appeared before me, Michael A. Balduzzi, who, being duly sworn, did state that he is Senior Vice President and Chief Nuclear Officer of Vermont Yankee Nuclear Power Corporation, that he is authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.

Sally A. Sandstrum
 Sally A. Sandstrum, Notary Public
 My Commission Expires February 10, 2003

Attachment (contains Safeguards Information)

cc: (with Attachment)

U.S. Nuclear Regulatory Commission
 ATTN: Mr. Glenn M. Tracy, Chief
 Operator Licensing, Human Performance
 and Plant Support Branch, NRR
 Mail Stop O-6H16
 One White Flint North
 11555 Rockville Pike
 Rockville, MD 20852-2738

U.S. Nuclear Regulatory Commission, Region I
 ATTN: Mr. John R. White, Chief
 Radiation Safety and Safeguards Branch
 475 Allendale Road
 King of Prussia, PA 19406-1415

U.S. Nuclear Regulatory Commission
 Resident Inspector – VYNPS
 Vermont Yankee Nuclear Power Station

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cc: (without Attachment)

U.S. Nuclear Regulatory Commission
ATTN: Assistant General Counsel for Materials Litigation
and Enforcement
Washington, DC 20555

U.S. Nuclear Regulatory Commission
Regional Administrator – Region I
475 Allendale Road
King of Prussia, PA 19406-1415

U.S. Nuclear Regulatory Commission
NRR Licensing Project Manager - VYNPS
Washington, DC 20555

Vermont Department of Public Service

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