



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

Christopher J. Wamser
Site Vice President

10 CFR 2.390 Attachments Withheld

BVY 12-046

July 2, 2012

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Proposed Change No. 301 - Cyber Security Plan Implementation Schedule
Milestones
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License Number DPR-28

- References:
1. Letter, NRC to Entergy Nuclear Operations, Inc., "Vermont Yankee Nuclear Power Station- Issuance of Amendment Re: License Amendment Request - Cyber Security Plan (TAC No. ME4296)," dated July 20, 2011, NRY 11-056
 2. Letter, Entergy Nuclear Operations, Inc. to NRC, "Technical Specifications Proposed Change 292, Supplement 2, Response to Request for Additional Information (RAI) and Revision to the Vermont Yankee Cyber Security Plan," dated April 4, 2011, BVY 11-023

Dear Sir or Madam:

In Reference 1, the NRC issued License Amendment No. 247 to the Facility Operating License for Vermont Yankee (VY) that approved the Vermont Yankee Cyber Security Plan and associated implementation milestone schedule. The Cyber Security Plan Implementation Schedule contained in Reference 2 was utilized as a portion of the basis for the NRC's safety evaluation report provided by Reference 1. Entergy is planning to implement the requirements of Implementation Schedule Milestone 6 in a slightly different manner than described in the approved Implementation Schedule. Although no change to the Implementation Schedule date is proposed, the change to the description of the milestone activity is conservatively considered to be a change to the Implementation Schedule, and in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, Entergy is submitting this request for an amendment to the Facility Operating License for Vermont Yankee. The Vermont Yankee Cyber Security Plan, Revision 0 was previously provided in Reference 2.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains proposed marked-up operating license pages for the Physical Protection license condition for Vermont Yankee to reference the commitment change provided in this submittal.

This letter contains security-related information – Attachment 1 (Sections 1, 2, 3) and Attachment 4 are withheld from public disclosure per 10 CFR 2.390

S001A

This letter contains security-related information – Attachment 1 (Sections 1, 2, 3) and Attachment 4 are withheld from public disclosure per 10 CFR 2.390

Attachment 3 contains the proposed revised operating license pages. Attachment 4 contains a change to the scope of Implementation Milestone 6. Entergy requests that Attachments 1 (Sections 1, 2, and 3) and 4 which contain security-related information (SRI) be withheld from public disclosure in accordance with 10 CFR 2.390.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the changes involve no significant hazards consideration. The bases for these determinations are included in Attachment 1.

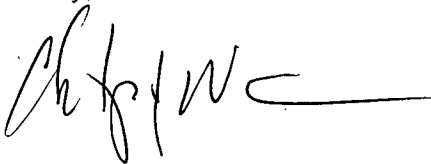
Entergy requests this license amendment be effective as of its date of issuance. Although this request is neither exigent nor emergency, your review and approval is requested prior to December 31, 2012.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Vermont Official.

The revised commitment contained in this submittal is summarized in Attachment 5. Should you have any questions concerning this letter, or require additional information, please contact Robert J. Wanczyk at 802-451-3166.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. J. Wanczyk', followed by a horizontal line.

CJW/jmd

- Attachments:
1. Analysis of Proposed Operating License Change (contains SRI)
 2. Proposed Vermont Yankee Operating License Changes (mark-up)
 3. Revised Vermont Yankee Operating License Pages
 4. Revised Cyber Security Plan Implementation Schedule (contains SRI)
 5. List of Regulatory Commitments

This letter contains security-related information – Attachment 1 (Sections 1, 2, 3) and Attachment 4 are withheld from public disclosure per 10 CFR 2.390

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

Mr. Richard V. Guzman
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

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and Attachment 4 are withheld from public disclosure per 10 CFR 2.390

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Attachment 2

Proposed Change No. 301

Proposed Vermont Yankee Operating License Changes (mark-up)

Safety Analysis Report for the facility and as approved in the SER dated January 13, 1978, and supplemental SERs, dated 9/12/79, 2/20/80, 4/15/80, 7/3/80, 10/24/80, 11/10/81, 1/13/83, 7/24/84, 3/25/86, 12/1/86, 12/8/89, 11/29/90, 8/30/95, 3/23/97, 6/9/97, 8/12/97, 3/6/98, 3/31/98, 9/2/98, and 2/24/99, subject to the following provisions:

Entergy Nuclear Operations, Inc. may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

G. Security Plan

Entergy Nuclear Operations, Inc. shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans¹, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Vermont Yankee Nuclear Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," submitted by letter dated October 18, 2004, as supplemented by letter dated May 16, 2006.

Entergy Nuclear Operations, Inc. shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). Entergy Nuclear Operations, Inc. CSP was approved by License Amendment No. 247, *as supplemented by change approved by license*

Amendment No. xxx

H. This paragraph deleted by Amendment No. 107, 8/25/88.

I. This paragraph deleted by Amendment No. 131, 10/7/91.

J. License Transfer Conditions

On the closing date of the transfer of Vermont Yankee Nuclear Power Station (Vermont Yankee), Entergy Nuclear Vermont Yankee, LLC shall obtain from Vermont Yankee Nuclear Power Corporation all of the accumulated decommissioning trust funds for the facility, and ensure the deposit of such funds into a decommissioning trust for Vermont Yankee established by Entergy Nuclear Vermont Yankee, LLC. If the amount of such funds does not meet or exceed the minimum amount required for the facility pursuant to 10 CFR 50.75, Entergy Nuclear Vermont Yankee, LLC shall at such time deposit additional funds into the trust and/or obtain a parent company guarantee (to be updated annually) and/or obtain a surety pursuant to 10 CFR 50.75(e)(1)(iii) in a form acceptable to the NRC and in an amount or amounts which, when combined with the decommissioning trust funds for the facility that have been obtained and deposited as required above, equals or

¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

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Attachment 3

Proposed Change No. 301

Revised Vermont Yankee Operating License Pages

Safety Analysis Report for the facility and as approved in the SER dated January 13, 1978, and supplemental SERs, dated 9/12/79, 2/20/80, 4/15/80, 7/3/80, 10/24/80, 11/10/81, 1/13/83, 7/24/84, 3/25/86, 12/1/86, 12/8/89, 11/29/90, 8/30/95, 3/23/97, 6/9/97, 8/12/97, 3/6/98, 3/31/98, 9/2/98, and 2/24/99, subject to the following provisions:

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H. This paragraph deleted by Amendment No. 107, 8/25/88.

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Attachment 5
Proposed Change No. 301
List of Regulatory Commitments

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The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy will implement milestones 1, 2, 3, 4, 5, and 7 described in Attachment 4 of letter BVY 11-023 dated April 4, 2011, and the revised Milestone 6 in Attachment 4 of this submittal.	X		December 31, 2012