



Entergy Nuclear Operations, Inc.  
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Vernon, Vermont 05354  
Tel: (802) 257-7711

Christopher J. Wamser  
Site Vice President

10 CFR 50.90

BVY 15-040

June 24, 2015

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

SUBJECT: License Amendment Request – Revised Cyber Security  
Plan Implementation Schedule  
Proposed Change No. 311  
Vermont Yankee Nuclear Power Station  
Docket No. 50-271  
License No. DPR-28

- REFERENCES:
1. NRC Internal Memorandum to Barry Westreich from Russell Felts, *Review Criteria for 10 CFR 73.54, Cyber Security Implementation Schedule Milestone 8 License Amendment Requests*, dated October 24, 2013 (ML13295A467)
  2. Letter, USNRC to Entergy Nuclear Operations, Inc., *Issuance of Amendment Re: License Amendment Request - Cyber Security Plan*, NRY 11-056, dated July 20, 2011 (ML11152A013)
  3. Letter, USNRC to Entergy Nuclear Operations, Inc., *Issuance of Amendment to Renewed Facility Operating License Re: Cyber Security Plan Implementation Schedule Milestone*, NRY 12-075, dated November 13, 2012 (ML12261A292)
  4. Letter, USNRC to Entergy Nuclear Operations, Inc., *Issuance of Amendment to Renewed Facility Operating License Re: Cyber Security Plan Implementation Schedule*, NRY 14-082, dated November 12, 2014 (ML14206A710)

Dear Sir or Madam:

Pursuant to 10 CFR 50.4 and 10 CFR 50.90, Entergy Nuclear Operations, Inc. (Entergy) hereby requests an amendment to the Renewed Facility Operating License for Vermont Yankee Nuclear Power Station (VY). In accordance with the guidelines provided by Reference 1, this request proposes a change to the VY Cyber Security Plan Milestone 8 full implementation date as set forth in the Cyber Security Plan Implementation Schedule approved by References 2, 3 and 4.

S00/A  
NR

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains the proposed marked-up operating license page for the Security Plan license condition for VY to reference the commitment change provided in this submittal. Attachment 3 contains the proposed revised operating license page. Attachment 4 contains a proposed change to the implementation date for Milestone 8. Entergy requests that Attachment 1 (sections 1, 2 and 3) and Attachment 4, which contain security-related information (SRI), be withheld from public disclosure in accordance with 10 CFR 2.390. When separated from these attachments, this cover letter and remaining attachments are decontrolled.

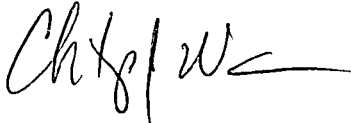
The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the change involves no significant hazards consideration. The bases for these determinations are included in Attachment 1.

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 June 30, 2016.

This letter contains no new regulatory commitments. As noted above, Attachment 4 provides a revised completion date for full implementation of Milestone 8 of the VY Cyber Security Plan. Should you have any questions concerning this letter, or require additional information, please contact Mr. Coley C. Chappell at (802) 451-3374.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on June 24, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Chappell', followed by a horizontal line.

CJW/JTM

Attachments: 1. Analysis of Proposed Operating License Change  
2. Proposed VY Operating License Change (mark-up)  
3. Revised VY Operating License Page  
4. Revised Cyber Security Plan Implementation Schedule

cc list: (next page)

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

NRC Resident Inspector  
Vermont Yankee

U. S. Nuclear Regulatory Commission  
Attn: James S. Kim, Project Manager  
OWFN – Mail Stop O-8D15  
11555 Rockville Pike  
Rockville, MD 20852-2378

Mr. Christopher Recchia, Commissioner  
Vermont Department of Public Service  
112 State Street – Drawer 20  
Montpelier, Vermont 05620-2601

**Attachment 2**

**BVY 15-040**

**Proposed VY Operating License Change (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 plans<sup>1</sup>, 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 a change approved by License Amendment Nos. 251, and 259, and 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

<sup>1</sup> The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

**Attachment 3**

**BVY 15-040**

**Revised VY Operating License Page**

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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