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10 CFR 50.54(a)

CNRO-2016-00015
BVY 16-015

May 05, 2016

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

SUBJECT: Response to Request for Additional Information Pertaining to a Change to the
Entergy Vermont Yankee Quality Assurance Program Manual (VY QAPM)

Vermont Yankee Nuclear Power Station
Docket Nos. 50-271 & 72-59
License No. DPR-28

- REFERENCES:
1. Entergy Letter to NRC, "Entergy Vermont Yankee Quality Assurance Program Manual," dated February 4, 2016. (CNRO-2016-00003, BVY 16-002) (ADAMS Accession No. ML16035A506)
 2. NRC Letter to Entergy Nuclear Operations, Inc., "Request for Additional Information Related to Proposed Changes to Quality Assurance Program Manual, Vermont Yankee Nuclear Power Station (CAC No. L53120)," dated April 5, 2016 (ADAMS Accession No. ML16090A029)

Dear Sir or Madam:

By Reference 1, Entergy Nuclear Operations, Inc. (Entergy) submitted to the NRC for approval, pursuant to 10 CFR 50.54(a)(4), several proposed changes to the Vermont Yankee (VY) Quality Assurance Program Manual (QAPM). By Reference 2, the NRC transmitted to Entergy a Request for Additional Information (RAI) pertaining to Entergy's request. The response to the RAI is provided in Attachment 1 to this letter. Attachment 2 contains a markup of QAPM pages affected by the response.

This letter contains no new regulatory requirements.

Should you have any questions, please contact Mr. Coley Chappell at 802-451-3374.

Regards,

A handwritten signature in blue ink, appearing to read "M. Perito", is written over the "Regards," text.

MP/jal

- Attachments:
1. Response to NRC Request for Additional Information
 2. Markup of VY QAPM Affected Pages

cc:

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ATTACHMENT 1

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RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION

**REQUEST FOR ADDITIONAL INFORMATION
ENTERGY VERMONT YANKEE QUALITY ASSURANCE PROGRAM MANUAL
(DOCKET NOS. 50-271, 72-59)**

RAI 1.0

The requirements of 10 CFR Part 50, Appendix B Criterion II “Quality Assurance Program,” state that, “The [QA] program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.”

Section A.1 in Appendix B of the Vermont Yankee QAPM, Revision 4, removes the statement, “A Certified Fuel Handler shall be qualified in accordance with the applicable requirements of 10 CFR 55.”

With the removal of the aforementioned statement, please provide clarification on how Certified Fuel Handlers shall be qualified. Also, the definition of a Certified Fuel Handler, pursuant to 10 CFR 50.2, is described as “a non-licensed operator who has qualified in accordance with a fuel handler training program approved by the Commission.” Provide a reference to the approved Certified Fuel Handler Training Program, under which non-licensed operators will be qualified.

Response

The statement, “A Certified Fuel Handler shall be qualified in accordance with the Technical Specifications.” will be added to Section A.1 in Appendix B to the QAPM, as shown in the markup provided in Attachment 2 of this letter.

Vermont Yankee Nuclear Power Station (VY) Technical Specification 6.2.C, “Facility Staff Qualifications,” includes the following:

1. Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM)
2. An NRC approved training and retraining program for Certified Fuel Handlers shall be maintained.

Revised Technical Specification (TS) 6.2.C was issued in Amendment No. 260 to the VY Administrative Controls Technical Specifications, by letter from NRC to Entergy, dated December 22, 2014 (ADAMS Accession No. ML14217A072). The Safety Evaluation statements related to revised TS 6.2.C.2 reference the Certified Fuel Handler training and retraining program for VY, approved by the NRC staff on October 1, 2014 (ADAMS Accession No. ML14162A209), and concluded that this TS appropriately requires the establishment and maintenance of a program to train and retrain Certified Fuel Handlers for positions requiring such qualification that are specified in the TS.

As a point of clarification, references to “Revision 4” of the VY QAPM were based on approval of the proposed changes by the requested date of April 15, 2016. Rather, the proposed changes to the VY QAPM that are considered reductions in commitments will be incorporated in a future revision to the VY QAPM to be issued subsequent to NRC approval and in accordance with the implementation schedule. As stated in Reference 1, other changes that are not considered to be reductions in commitments, including organizational changes, clarifications and editorial changes, are planned to be implemented in May 2016.

RAI 2.0

The requirements of 10 CFR Part 50, Appendix B Criterion II “Quality Assurance Program,” states that, “The [QA] program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.”

Section A.1 in Appendix B of the Vermont Yankee QAPM, Revision 4, states that, “Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.”

Clarify which positions can be considered to meet more restrictive aspects without further review and documentation.

Response

Amendment No. 253 to the VY Renewed Facility Operating License, issued by letter from NRC to Entergy, dated December 28, 2012 (ADAMS Accession No. ML12347A140), in part, revised TS 6.2.C to change minimum qualifications for each member of the unit staff from ANSI N-18.1-1971 to ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Entergy QAPM. Section 3.2 of the Safety Evaluation for Amendment No. 253 references NRC staff safety evaluation dated November 6, 1998 (ADAMS Legacy Accession Nos. 9811170123 and 9811170129) which found this standard acceptable as referenced in the Entergy QAPM and TSs for Entergy plants. The revision to the VYNPS TS was to allow the use of the Entergy QAPM as the single document to control exceptions or clarifications to the standard, and was found acceptable. As discussed in the Safety Evaluation, the statement is an allowance to preclude disqualifying individuals who met the previous commitments but do not meet the more restrictive new commitments, and was retained in the Entergy QAPM.

For example, this allowance would apply to any individual serving in the Radiation Protection Manager position at the time the changes were approved (see Safety Evaluation Section 3.2.2.2). As further discussed in Safety Evaluation Section 3.2.2.8, “Grandfathering without Justification and Documentation,” the only personnel who will be affected by this exception are already qualified incumbents who are performing their jobs on a daily basis. When incumbents leave their positions, new candidates will be judged in accordance with the new qualification standards.

VY procedure V-EN-HR-137, “Complying with the Standards for Selecting Nuclear Power Plant Personnel,” ensures replacements for incumbents meet the new requirements prior to employment in the position. Although the “grandfathering” exception in the Entergy QAPM had been retained in the VY QAPM (incorporated with Revision 0), due to site organizational changes that have occurred subsequent to 2012 and resulting from VY entering decommissioning, this exception is no longer necessary, and will be deleted from the VY QAPM as shown in the markup provided in Attachment 2.

RAI 3

The requirements of 10 CFR Part 50, Appendix B Criterion XVIII “Audits,” states that, “A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program.”

Section 2.0 in Appendix D of the Vermont Yankee QAPM Revision states in part that, the SRC shall] advise the management of the audited organization and the chief nuclear officer and VY executive of the review results as they relate to the safe storage of irradiated fuel...The SRC’s responsibility shall include oversight of the Audit Program. Audits shall be performed of the activities and the associated frequencies as defined in Section C.”

The schedule of audits provided in Section C.2.a does not include an audit schedule for the storage of irradiated fuel. Provide clarification of the audit schedule for irradiated fuel storage.

Response

Section C.2.a states that the audit program applies to activities affecting quality, which includes safety-related and important-to-safety structures, systems, and components (SSCs) related to the storage of irradiated fuel at the VY facility and the VY Independent Spent Fuel Storage Installation (ISFSI), as described in Appendix A. As such, the QAPM and audit schedule is applicable to the safety-related and important-to-safety SSCs associated with the safe storage of irradiated fuel in the Spent Fuel Pool, dry fuel storage, and transportation packages. This approach to audit schedules and audit areas is the same as was applied during unit operations under the Entergy QAPM, prior to VY entering decommissioning, which also addressed irradiated fuel storage.

Although the audit areas listed in the Section C.2.a.2 do not specifically identify “irradiated fuel storage,” many of the audits within the audit schedule have elements that directly apply to irradiated fuel storage, and collectively these audit areas address the audit requirements related to irradiated fuel storage. This is similar in concept to the audit schedule described in C.2.a.4, which allows for combining audits to cover the areas defined in C.2.a.2 that are invoked by the ISFSI technical specifications, although the individual audit areas do not specifically reference “ISFSI” in the descriptions. Thus, these audits will address the applicable elements as they relate to irradiated fuel storage at the frequencies specified within the audit schedule.

Audit results are provided to the off-site safety review committee to ensure fulfillment of requirements related to the safe storage of irradiated fuel. This approach of performing audits related to irradiated fuel storage is comparable to the methodology used at other facilities that previously entered decommissioning (refer to Enclosures 2 and 3 provided with Reference 1 to this letter.

ATTACHMENT 2

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MARKUP OF VY QAPM AFFECTED PAGE

Appendix B Regulatory Commitments

A. Regulatory Guide 1.8 Revision 1, dated September 1975

Clarification/Exception

1. General

VY is committed to Sections 1 – 4 of ANSI/ANS 3.1-1978 with following clarifications and exceptions.

Qualification requirements for personnel shall meet ANSI/ANS 3.1-1978 except the following:

- a. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2, 1987.
- b. Managers required to be a Certified Fuel Handler are specified in the Technical Specifications.
- c. A Certified Fuel Handler shall be qualified in accordance with the Technical Specifications. ~~A Certified Fuel Handler shall be qualified in accordance with the applicable requirements of 10 CFR 55.~~

~~Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.~~