

October 22, 2014

401 Congress Avenue
Suite 2100
Austin, Texas 78701512.370.2800 OFFICE
512.370.2850 FAX
winstead.com**Via e-mail: administration@tllrwdcc.org**

Hon. Robert C. Wilson, Chairman
Texas Low Level Radioactive Waste Disposal Compact Commission
333 Guadalupe St. #3-240
Austin, TX 78701

**Re: Petition to Export Class A Low-Level Radioactive Waste for Disposal
Vermont Yankee Nuclear Power Station**

Dear Chairman Wilson:

Enclosed please find a petition (the "Petition") to export Class A low-level radioactive waste ("LLRW") generated at Vermont Yankee Nuclear Power Station ("Vermont Yankee") for permanent disposal in the non-compact, commercial disposal facilities owned and operated by EnergySolutions, LLC near Clive, Utah. Disposal would occur pursuant to an existing long-term disposal agreement between Entergy Nuclear Operations, Inc./Vermont Yankee and EnergySolutions for disposal of Class A LLRW generated at Vermont Yankee. The timeframe requested is from January 1, 2015 through August 31, 2015. Vermont Yankee is requesting consideration of the Petition at the Commission's November 13, 2014 meeting.

Vermont Yankee is pleased that the Compact Waste Facility ("CWF") is successfully receiving LLRW for disposal from Vermont Yankee. However, Vermont Yankee is requesting authorization from the Compact Commission (the "Commission") to export low-dose rate, low density Class A DAW LLRW, and low-dose rate, high-density Class A LLRW, all of which is ≤ 100 mR/hr ("Low-Dose Rate Class A LLRW"). The Low-Dose Rate Class A LLRW is all Class A LLRW generated by Vermont Yankee except for the high-dose rate Class A resins and high dose rate DAW, which Vermont Yankee is shipping to the CWF for disposal.

Enclosed with the Petition is a suggested form of Order Authorizing the Export of LLRW that has been utilized in the past. We are available to provide additional information upon request prior to the Commission meeting on November 13, 2014.

Sincerely,



Derek Seal
Counsel for Vermont Yankee Nuclear Power Station

Enclosures: Petition
Draft Order

**Petition to Export Class A Low-Level Radioactive
Waste for Permanent Disposal**

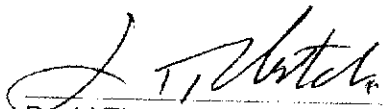
1. **Petitioner:** Vermont Yankee Nuclear Power Station, an affiliate of Entergy Nuclear Operations, Inc., with principal offices of Entergy Nuclear Operations, Inc. located at 440 Hamilton Ave., White Plains, New York 10601.
2. **Proposed Disposal Facility:** EnergySolutions, LLC's, non-compact, commercial facility near Clive, Utah, pursuant to long-term disposal agreement between Entergy Nuclear Operations, Inc. and EnergySolutions, LLC.

Note: Some or all waste will require volume reduction processing or treatment at EnergySolutions' facilities in Tennessee prior to disposal at EnergySolutions' facilities in Utah pursuant to the existing contract agreement.

3. **Effective Period:** January 1, 2015 through August 31, 2015.
4. **Specified Amount:** The table below estimates the volume and waste type that will be shipped during the period of this petition. The waste quantity provided below represents an untreated waste volume that will be shipped from Vermont Yankee Nuclear Power Station. Pursuant to the existing contract with EnergySolutions, waste treatment decisions, methods and timing occur at EnergySolutions' discretion to provide optimized cost.

Low-Dose Rate, Low Density Class A Dry Active Waste ft ³ (≤ 100 mR/hr)	Low-Dose Rate, High-Density Class A LLRW ft ³ (≤ 100 mR/hr)	Total Estimate ft ³
8,960	1,725	10,685
	10% Contingency	1,068
	Total petition ft ³	11,753

Submitted this the 21st day of October, 2013.



 David Tkatch
 Radiation Protection Manager
 Entergy, Vermont Yankee

**TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL
COMPACT COMMISSION**

Order Authorizing the Export of Waste for

Vermont Yankee Nuclear Power Station/Entergy Nuclear Operations, Inc.

On or about October 21, 2014 the Texas Low-Level Radioactive Waste Disposal Compact Commission ("Commission") received from Vermont Yankee Nuclear Power Station/Entergy Nuclear Operations, Inc. ("Vermont Yankee") a Petition to Export Class A Low-Level Radioactive Waste for Permanent Disposal ("Petition") in the EnergySolutions, LLC, facility located near Clive, Utah. The Petition was filed pursuant to Section 3.05(7) of the Texas Low-Level Radioactive Waste Disposal Compact and the Commission resolution dated December 11, 2009 authorizing consideration of such export petitions.

By a [] vote of those present, with [] absent, at the Commission's meeting posted for November 13, 2014, a majority of the members of the Commission approved the Petition filed by Vermont Yankee on the terms stated in the Petition, subject only to the following terms and conditions:

1. Vermont Yankee will supply to the Commission:
 - a. Manifests and/or reports of volume, mass, and activity sent for ultimate disposal which are satisfactory to the Commission.
 - b. Final reconciliation of waste volume concluded not later than 180 days post-Order period.
2. The period of the shipment of the waste from the site of generation is authorized as effective from January 1, 2015 and shall expire at the end of the day on August 31, 2015.

It is hereby Ordered that Vermont Yankee is authorized to export low-level radioactive waste as requested in the Petition, subject to the terms and conditions as stated in this Order. The Petition is attached to this Order.

Signed _____, 2014.

Robert (Bob) C. Wilson, Chair
Texas Low-Level Radioactive Waste Disposal Compact Commission