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Christopher J. Wamser
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BVY 14-054

August 14, 2014

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

SUBJECT: Proposed Changes to the Vermont Yankee Emergency Plan - Supplement 2 (TAC No. MF3668)
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

- REFERENCES:
1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Proposed Changes to the Vermont Yankee Emergency Plan," BVY 14-018, dated March 24, 2014 (TAC No. MF3668) (ADAMS Accession No. ML14085A257)
 2. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Proposed Changes to the Vermont Yankee Emergency Plan - Supplement 1 (TAC No. MF3668)," BVY 14-034, dated May 21, 2014 (ADAMS Accession No. ML14149A048)
 3. Letter, USNRC to Entergy Nuclear Operations, Inc. "Vermont Yankee Nuclear Power Station - Request For Additional Information Regarding License Amendment Request For Emergency Plan Change (TAC No. MF3668)," NVY 14-055, dated July 1, 2014 (ADAMS Accession No. ML14163A590)

Dear Sir or Madam:

By letter dated March 24, 2014 (Reference 1), Entergy Nuclear Operations, Inc. (ENO) proposed an amendment to Renewed Facility Operating License (OL) DPR-28 for Vermont Yankee Nuclear Power Station (VY). The proposed amendment would revise the site emergency plan (SEP) for the permanently defueled condition. The proposed SEP changes would revise the on-shift staffing and Emergency Response Organization (ERO) staffing levels.

Reference 2 provided a response to an NRC Request for Additional Information (RAI) regarding the proposed SEP changes. In Reference 3, the NRC provided VY with an additional RAI regarding the proposed SEP changes. Attachment 1 of this letter provides the responses to the RAI. Attachment 2 contains revised SEP pages and Attachment 3 contains an updated summary of the proposed SEP changes.

The conclusions of the no significant hazards consideration and the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this supplement.

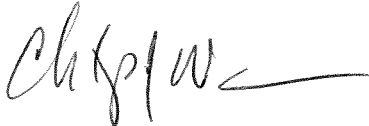
This letter contains no new regulatory commitments.

If you have any questions on this transmittal, please contact Mr. Philip Couture at 802-451-3193.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 14, 2014.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Couture", with a long horizontal flourish extending to the right.

CJW/plc

- Attachments:
1. Response to Request for Additional Information
 2. Revised SEP Pages
 3. Updated Tabular Summary of Proposed Changes to SEP

cc: Mr. William M. Dean
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Attachment 1

Vermont Yankee Nuclear Power Station
Response to Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION
REGARDING AMENDMENT REQUEST FOR EMERGENCY PLAN CHANGE
ENTERGY NUCLEAR OPERATIONS, INC.
VERMONT YANKEE NUCLEAR POWER STATION
DOCKET NO. 50-271

RAI-VY-01

Attachment 1 (on Page 2 of 23) states:

NCOs [*non-certified operators*] will perform duties typically associated with those performed by AOs [*auxiliary operators*] and CROs [*control room operators*], such as manipulation and monitoring of plant equipment. NCOs will also be assigned to monitor indications and communications in the Control Room.

Please specify what is the level of training provided to the NCOs to perform the duties of the AOs/CROs with respect to operation and monitoring of plant equipment, mitigative strategies, and emergency plan training?

Response

The Non-Certified Operator (NCO) Training Program is currently under development in accordance with 10 CFR 50.120. The NCO position combines the post-shutdown duties of the licensed Reactor Operator (RO) and the non-licensed Auxiliary Operator (AO). The specific training requirements of the NCO position are currently being drafted by the Vermont Yankee (VY) Training Department and have not yet been reviewed and approved by Operations management. The draft training requirements include classroom training in theory and systems topics, administrative procedures, off-normal and transient procedures/mitigation strategies and refuel platform operations. The training program is designed with an emphasis on systems/processes important to maintaining Spent Fuel Pool (SFP) cooling and monitoring and controlling SFP parameters, such as SFP water level and temperature. Consequently, the NCOs will be trained on pertinent Control Room indications and controls that will be monitored and operated to maintain SFP cooling and SFP water level, in addition to plant radiological conditions.

The drafted NCO training program will also include training on applicable aspects of the VY Site Emergency Plan (SEP) related to NCO duties.

Although non-licensed AOs are currently trained to function as the Control Room Communicator, VY makes no specific commitment to train NCOs in this role because it is anticipated that the two Certified Fuel Handlers (CFHs) that will be located in the Control Room during a declared emergency will maintain responsibility for Emergency Plan communications.

Personnel assigned to fill the NCO positions during the post-shutdown period, prior to implementation of the Permanently Defueled Emergency Plan (PDEP), are a mixture of licensed ROs and non-licensed AOs. The majority of the required training for the NCO position will already have been completed by the licensed ROs because they have previously been trained and qualified as both Reactor and Auxiliary Operators to support power operations. The current AOs

have been trained and qualified as non-licensed operators only. Therefore it is expected they will require additional training to address skill and knowledge gaps related to Control Room operations.

Once the specific training requirements for the NCO position have been identified using a systematic approach to training, as required by 10 CFR 50.120, a formal gap analysis will be completed for all operators identified to fill the NCO position. Individualized training plans will be developed and completed to address the identified knowledge and skills gaps for the selected NCO candidates. This will include training the currently qualified AOs on Control Room indications, controls and procedures.

RAI-VY-02

Attachment 1 (on Page 6 of 23) states:

The OSC [*operations support center*] Manager is the only position required to activate and staff the OSC.

In addition, Section 6.1.2 of the Site Emergency Plan (SEP) states:

It is staffed with sufficient in-plant personnel required to effect protective and corrective actions in support of the emergency situation.

Please explain how the OSC can be staffed with sufficient in-plant personnel required to effect protective and corrective actions in support of the emergency situation if the OSC Manager is the only position required to activate and staff the OSC?

Response

The primary functions of the OSC will remain dispatching of, and accounting for, Repair and Corrective Action Teams and dispatching of Site Boundary and Offsite Monitoring Teams. The OSC Manager is responsible for ensuring adequate staffing of the OSC to support the emergency; working with the Emergency Plant Manager to set priorities for the OSC; and directing the activities of the OSC to support emergency response. If, at any time, the OSC Manager determines additional manpower is necessary to accomplish the mission of the OSC, the OSC Manager will contact the Administration and Logistics Coordinator in the EOF to arrange for augmentation by additional personnel to support the emergency response functions of the OSC.

The spectrum of credible accidents and operational events, and the quantity and complexity of activities required for the safe storage of spent nuclear fuel is reduced as compared to an operating plant. The primary events of concern in the immediate post-shutdown and defueled condition will be a fuel handling accident and a loss of SFP cooling and/or water inventory. During fuel handling activities there will be extra personnel on site that will, were a fuel handling accident to occur, be able to respond to the event. Events involving a loss of SFP cooling and/or water inventory can be addressed by implementation of SFP inventory makeup strategies required under 10 CFR 50.54(hh)(2). These strategies will also continue to be required as a license condition. OSC staff is not relied upon to implement SFP inventory makeup.

RAI-VY-03

Attachment 1 / page 7 of 23 provides:

Table 1 shows the TSC [*technical support center*] Reactor Engineer has a yes for minimum staff position.

In addition, Attachment 1 (on Page 2 of 23) provides that the TSC Reactor Engineer is a position that ENO proposes to eliminate. These statements are in conflict. Please clarify whether the TSC Reactor Engineer is being retained as minimum staffing or provide justification for removal as a minimum staffing position.

Response

These statements are reconciled as follows. The intent of Table 1 is to compare the current ERO positions against the proposed post-shutdown ERO positions and identify whether each position is currently a minimum staff position. The TSC Reactor Engineer is a position that is being eliminated in the post-shutdown ERO. Table 1 in Attachment 1 of Reference 2 identifies the Reactor Engineer as a current minimum staff position and the position is not included as a proposed position in the post-shutdown ERO upon implementation of the changes identified in Reference 2.

Attachment 5 of emergency plan procedure EPOP-TSC-3542 outlines the duties of the TSC Reactor Engineer position. Specifically, Section 2.2 of Attachment 5 identifies the duties as follows:

- Assist the Shift Manager, Emergency Plant Manager, TSC Manager and Engineering Coordinator, as necessary.
- Assist operations personnel in calculating and tracking core reactivity.
- Assist the Engineering Coordinator in clarifying core parameter information.
- Perform a core damage assessment if an ATWS [anticipated transient without scram] condition or fuel failure exists.
- Work with other TSC Engineers to provide support to the Control Room to mitigate the effects of the event and return the plant to a safe condition.
- Assist in Severe Accident Management Guideline implementation, when requested.
- Provide recommendations to plant operators.
- Assist in developing emergency procedures, if needed.

Attachment 5 of Reference 2 identifies three primary duties for the Reactor Engineer, including: determining and providing an estimate of core damage, assisting in the implementation of Severe Accident Management Guidelines and providing core parameter information results to the TSC Manager. In a permanently shutdown and defueled condition, responsibilities associated with a reactor core no longer need to be maintained. Any other duties described in implementing procedures that are unrelated to core assessment, such as assisting the Emergency Plant Manager, TSC Manager and Engineering Coordinator; assisting with implementation of Severe Accident Management Guidelines; providing recommendations to plant operators; and assisting in developing emergency procedures are either no longer necessary in a permanently defueled condition or will be performed by other members of the post-shutdown ERO.

RAI-VY-04

Attachment 1 (on Page 8 of 23) states:

ERO duties have been reviewed and duties for eliminated positions will be transferred appropriately.

Please describe by what process has this been validated and documented for the emergency operations facility (EOF) and Joint Information Center (JIC)?

Response

Each current ERO position is identified and the associated duties are captured in the ERO Task Analysis provided in Attachment 5 of Reference 2. The duties of the EOF and JIC positions that are being eliminated were reviewed against NUREG-0654, and VY procedures EN-EP-801, "Emergency Response Organization," EN-TQ-110, "Emergency Response Organization Training," and EN-TQ-110-01, "Fleet Emergency Plan Training Course Summary." Each of the eliminated positions was analyzed to identify the key duties associated with the position and the duties were then evaluated against the planning standards in NUREG-0654.

The Table provided in Attachment 5 of Reference 2 contains columns with headings "Implementing Actions" and "Task Assigned To?" These columns provide the details for disposition of each task. This analysis was peer-checked by VY Emergency Planning. Procedures and training materials depicting the changes presented in Attachment 5 of Reference 2 will be developed. Some of the duties are identified as being eliminated because they become unnecessary following permanent cessation of operations and permanent removal of fuel from the reactor vessel. Other duties are identified as eliminated because the duties are performed by other positions of the ERO in the EOF or JIC and will continue to be performed by these positions in the post-shutdown ERO.

The proposed changes to the VY SEP, including the minimal changes made to the ERO to develop the post-shutdown ERO, have been evaluated for impacts on the EOF and the JIC and for the ability of offsite response organizations to implement their FEMA-approved Radiological Emergency Preparedness (REP) Plans. This analysis was provided to the NRC in Reference 3. As described in Reference 3, potential impacts on the ability of State and local response organizations to effectively implement their FEMA-approved REPs do not exist because no tasks that require interfacing with State and local response organizations are proposed for elimination. VY has appropriately addressed elimination of ERO positions that interface with offsite representatives by transferring the necessary tasks to remaining post-shutdown ERO positions.

To validate the results of the analysis described in Reference 3, drills will be developed and conducted in the 4th quarter of 2014, prior to the requested approval date of Reference 2. The drills will be conducted to confirm the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility and will utilize the post-shutdown procedures currently being developed depicting the revised assignment of duties. The drills will be used to train and qualify post-shutdown ERO members, evaluate and validate the ability to accomplish the stated mission of each emergency response facility, and ensure that the planning standard functions are preserved with no degradation in time sensitive activities or in the ability to communicate with offsite response organizations. The drills will also validate that the post-shutdown ERO continues to address the risks to public health and safety and comply with the SEP,

site commitments and applicable regulation. Drill dates will be provided to the NRC in advance and the NRC staff will be provided the opportunity to observe the drills. Additionally, supporting information regarding the drills will be provided to the NRC staff, if requested.

RAI-VY-05

Attachment 1 (on Page 10 of 23) states:

When the on-shift Chemistry Technician position is eliminated, the on-shift Radiation Protection Technician will be able to perform sampling and analysis, so as to not delay information potentially needed by the SM [*Shift Manager*] to determine if an emergency declaration is required.

Please describe what specific training is provided to the on-shift Radiation Protection Technician to be qualified to perform these samples and analyses functions?

Response

The incumbent Radiation Protection (RP) Technicians currently receive specific training modules which prepare them to perform sampling and analysis at various locations throughout the plant. Similar to Chemistry Technicians, incumbent RP Technicians have been trained on how to analyze these samples using a Multi-Channel Analyzer (MCA). These analyses are performed using an approved station procedure and a computerized MCA menu which guides the technician to select the correct counting geometry for various sample types.

There are no new skills or basic knowledge requirements involved in training incumbent RP Technicians to perform liquid sampling and analysis to support an emergency declaration. Currently, a Training Evaluation and Action Request (TEAR VTY-2014-163) is tracking the completion of the gap analysis between current RP Technician training requirements and any new specific knowledge requirements associated with emergency plan sampling and analysis. Such specific knowledge requirements would include how to obtain specific liquid samples. This TEAR will also track the completion of any required gap training for the incumbent RP Technicians who have been selected to fill SAFSTOR positions.

The initial training requirements for any new SAFSTOR RP Technician will include all training modules to ensure they are equipped with the required skills and knowledge to perform the required liquid sampling and analysis. These training modules will be specifically identified in the SAFSTOR training program description for the RP Technician position. This document is currently being developed in accordance with the requirements of 10 CFR 50.120.

RAI-VY-06

Attachment 1 (on Page 14 of 23) states:

The TSC Reactor Engineer position can be eliminated without increasing the risk to the public health and safety because the major task of evaluating core/thermal hydraulics is not necessary in a permanently shutdown and defueled condition.

Please explain whether the expertise of the TSC Reactor Engineer position would be needed to provide any technical evaluation support for an event in the spent fuel pool (e.g., a drain down event that may require an evaluation of the condition of the fuel to determine any possible recommendations for offsite agencies to consider).

Response

Elimination of the TSC Reactor Engineer position will have no effect on emergency response in a permanently defueled condition because the position does not assess the condition of fuel in the SFP during an emergency. The current TSC Reactor Engineer position satisfies the technical support Core/Thermal Hydraulics position included in Table B-1 of NUREG-0654. TSC Reactor Engineers have expertise in the area of core damage assessment and core parameter monitoring. Table B-1 does not identify an on-shift position responsible for evaluation of fuel in the SFP during an emergency. TSC Reactor Engineers are not trained to provide this type of technical evaluation. Instead, offsite technical assistance would need to be obtained to perform this analysis.

RAI-VY-07

Attachment 1, Section 5.2.6 (on Page 17 of 23) states:

The function of these additional resources is to provide RP [*radiation protection*] oversight of the on-shift complement of personnel and augmented personnel who are expected to respond to emergency events for damage repair, corrective actions, search and rescue, first aid, firefighting and personnel monitoring. They can also be expected to provide for access control and the issuance of dosimetry. Analysis of the proposed change for each of these tasks is discussed below. The fire brigade will continue to perform the tasks of search and rescue, first aid and firefighting in the permanently defueled condition.

In addition, Attachment 3, Table 8.4 (on Page 2 of 2) provides:

Protective Actions (In Plant) Shift AO/CRO/NCO (2^{})² on shift Note 2. All AOs/CROs/NCOs use digital dosimeters with features for dose rate and total dose monitoring. AOs/CROs/NCOs are trained to self-monitor in an emergency.**

The information in Note 2 is not consistent with that provided in Attachment 1, as cited above. There is a difference between self-monitoring and "providing RP oversight" as described in Section 5.2.6.

- Please clarify how RP oversight is provided for search and rescue, and firefighting. Based on the proposed on-shift staffing, it appears that they may be part of the fire brigade, and therefore, it would be a collateral duty.**
- Please clarify how the fire brigade members that may be primarily engaged in firefighting efforts or search and rescue missions are provided RP coverage.**

- **Please describe what training is provided that qualifies these two operations positions to perform RP oversight. Please refer to NRC Health Physics Position (HPPOS) 238, "Health Physics Position of Task Qualification of HP Technicians," in developing your response.**

Response

The portion of Table 8.4 referenced in the RAI was revised in Reference 2 only to indicate the title change for the Control Room Operator and Auxiliary Operator to Non-Certified Operator and does not represent any changes in radiation protection oversight from the currently assigned responsibilities. Section 8.1 and Table 8.4 of the SEP identify one (1) on-shift RP Technician.

The two operators identified in the portion of Table 8.4 referenced in the RAI are members of the fire brigade. They do not provide RP oversight during firefighting and search and rescue operations. Because the on-shift RP Technician provides RP oversight during search and rescue or firefighting, there are no collateral duties for the operators. The operators are trained to self-monitor in circumstances where it is safe to do so. Access control and personnel monitoring are described in section 5.2.6.1 of Reference 2.

RAI-VY-08

Attachment 1, Section 5.2.6.1 (on Page 17 of 23) states:

Worker access control is now automated because RP work processes have been computerized.

Please clarify whether there are active emergency Radiation Work Permits for use at all times in the event of emergency or are they required to be activated after an emergency classification.

Response

VY does not have Radiation Work Permits that must be activated after an emergency classification. Instead, existing, active Radiation Work Permits are available at all times, including during an emergency.

An annual Radiation Work Permit dedicated for emergency plan response will be written and available on the first day of each year which will pre-authorize access for emergency response personnel in accordance with emergency plan implementing procedures. Site personnel will be notified of the Radiation Work Permit via site wide email and shift turnover as part of the annual reminder to review new Radiation Work Permits. No additional training will be necessary as use of Radiation Work Permits is addressed in radiation worker training.

RAI-VY-09

Attachment 1, Section 5.2.6.1 (on Page 17 of 23) states:

No RP involvement is necessary for this contamination monitoring activity because workers are trained to perform this task without supervision or oversight.

Please clarify whether these workers are trained to remove tools and/or equipment from the Radiologically Controlled Area or do they require RP support.

Response

The contamination monitoring activities described in the RAI are specific to personnel monitoring and monitoring of personal items and radiation workers are trained in these tasks. However, workers are not trained to remove tools and/or equipment from the RCA. Removing tools and/or equipment from the RCA would require monitoring by a qualified RP Technician as is currently required by station procedures.

RAI-VY-10

Attachment 3, Table 8.4 (on Page 1 of 2) states:

Onsite (out of plant)	Shift RP Tech (1)	on shift
In plant surveys	Shift RP Tech (1)	on shift

Based on the staff's review, it appears that there would be two RP technicians on-shift since there is no designation that these major tasks may be collateral duties. Please confirm that this conclusion is correct in regards to the number of on-shift RP technicians.

Response

VY's current on-shift staffing complement includes one (1) RP Technician. The post-shutdown on-shift staffing changes proposed in Reference 2 do not include any changes to the number of on-shift RP Technicians. The current On-Shift Staffing Analysis has concluded that the current on-shift staff is able to cope with the spectrum of analyzed events until augmenting ERO staff arrives. Likewise, the analysis of the proposed post-shutdown on-shift staffing includes one (1) on-shift RP Technician. The analysis, developed to evaluate the ability of the proposed post-shutdown minimum on-shift staff to implement all emergency tasks, concludes that the proposed on-shift staff is able to cope with the spectrum of analyzed events in a permanently shutdown and defueled condition until augmenting ERO staff arrives.

Table B-1 of NUREG-0654 identifies the minimum staffing requirements for nuclear power plant emergencies. Table B-1 does not identify an on-shift position responsible for "onsite (out of plant)" surveys. During the initial stages of an emergency, the on-shift RP Technician will be assigned to the most critical tasks during the emergency response. For consistency with Table B-1 of NUREG-0654, ENO proposes to delete the reference to the RP Technician "on-site (out of plant)" entry in SEP Table 8.4. VY maintains the capability to augment on-shift staff with field monitoring teams to

perform this task within 30 minutes of notification of an emergency declaration. Attachment 2 of this response provides the revised pages of the SEP with the proposed changes shown in strikethrough and underline format resulting from the change to Table 8.4 and the proposed change to the SEP is included in the Tabular Summary of Proposed Changes included as Attachment 3 of this response.

RAI-VY-11

Attachment 3, Section 9.2.2.5 (on Page 83 of 125) states:

The EOF Manager establishes operations in the EOF/RC ...

However, Table 1 in Attachment 1 (on Page 7 of 23) indicates that this position is being eliminated. This position is also referenced in Attachment 3, Section 9.2.4 and numerous sections in the SEP that are not indicated in Attachment 3. Please clarify whether the EOF Manager position is being retained or eliminated, and provided appropriate supporting justification.

Response

The EOF Manager position is being eliminated. Attachment 2 of this response provides the revised pages of the SEP with the proposed changes shown in strikethrough and underline format resulting from the elimination of the EOF Manager position. The Tabular Summary of Proposed Changes to Site Emergency Plan, included as Attachment 2 to Reference 2, has been updated and is included as Attachment 3 of this response.

When operational, the EOF/RC assumes overall responsibility for the implementation of the emergency plan and serves as the near-site facility established to coordinate the activities of VY emergency response personnel; evaluate offsite accident conditions; and maintain coordination and communications with offsite response authorities. According to emergency planning procedure EPOP-EOF-3546, the EOF Manager is currently responsible for overseeing operations of the EOF/RC and assisting the Emergency Director in performance of key duties. Section 8.2.4 of the SEP currently describes the primary responsibilities of the EOF Manager as: 1) establish the EOF when required; 2) assess EOF habitability via the Radiological Assessment Coordinator; and 3) prepare the EOF for the arrival of offsite authorities and other support personnel. The duties of the EOF Manager are administrative in nature. The position has no role in accident assessment or mitigation activities and the position is not required to declare the facility operational.

The current ERO staffing required by the SEP and implementing procedures is intended to address the risks to public health and safety inherent in an operating reactor. As noted in Reference 2, ERO duties have been reviewed and duties for eliminated positions will be transferred to remaining ERO positions. Attachment 5 of Reference 2 provides the analysis of duties performed by the ERO, including the EOF Manager. Some of these duties are identified as being eliminated because they are already performed by other members of the ERO in the EOF and transfer of the responsibility is not necessary to ensure performance of the duty. The duties of the EOF Manager that are not currently performed redundantly by other ERO positions will not be eliminated, but will be transferred to the Emergency Director, Administration and Logistics Coordinator, EOF Technical

Advisor, Lead Off-Site Liaison or the Offsite Communicator in the EOF. Transfer of these duties is identified in Attachment 5 of Reference 2.

If additional resources are needed to support emergency response, the Emergency Director will assist or direct the Administration and Logistics Coordinator in obtaining additional resources.

RAI-VY-12

Attachment 4, Section V.2 (on Page 12) states:

VY has 30 and 60 minute emergency responders when augmented while the ERO is offsite. This analysis was conducted assuming a 90 minute response of the augmented ERO to allow the use of this analysis for a possible future extension in ERO augmentation times. There were no specific emergency response tasks assigned to the augmented ERO prior to the 90 minute response.

The staff is reviewing this application for proposed changes to on-shift staffing and 30/60 minute augmented responders, and not for the acceptability of a 90 minute augmented response. Please clarify the extent of changes being requested under ENO's license amendment.

Response

ENO is not requesting NRC review of any changes to the current 30/60 minute augmented response times. The statement included in Attachment 4, referenced, above, was provided for informational purposes only and documents an assumption used in the analysis.

RAI-VY-13

The staff's previous request for additional information, RAI-VY-01, based on our initial acceptability review, requested the following:

Please identify whether the proposed changes to the [Vermont Yankee Nuclear Power Station] VY SEP were evaluated for their impact with the State and local response organizations ability to effectively implement their [Federal Emergency Management Agency) FEMA-approved [radiological emergency preparedness] REP plans, specifically in regards to licensee interface and coordination with State and local response organizations? If so, please provide evaluation performed and documentation regarding discussions with affected State and local response organizations used in making this determination.

In ENO's response dated May 21, 2014, it is not apparent to the staff that the State and local response organizations performed this review of their plan. ENO's response appears to indicate that ENO performed these evaluations. Please clarify whether the affected State and local response organizations independently performed the review of their affected plans and concur with the results provided in the ENO's response dated May 21, 2014, or if not, please identify the areas of issues and how these issues are resolved.

Response

An email was sent on June 17, 2014 to the appropriate emergency management officials from the states of Vermont, New Hampshire and Massachusetts requesting that they confirm that any needed changes to the State emergency response plans or procedures associated with the positions being eliminated from the ERO after the shutdown of VY have been identified and that the SEP changes still provide for adequate coordination and interface with the State emergency response organizations. By July 1, 2014, representatives from each State emergency management agency had replied that reviews of their radiological emergency response plans had been completed and that no additional changes to any of the plans were identified during this review.

RAI-VY-14

The staff's previous RAI (RAI-VY-02), based on our initial acceptability review, requested the following:

If potential impacts to OROs exist, have the proposed changes to the VY SEP been reviewed and agreed upon by the affected OROs to ensure they can continue to meet the requirements of their current FEMA-approved emergency plans? Please provide documentation that the affected OROs have reviewed and concurred on the proposed changes.

FEMA/NRC MOU [Memorandum of Understanding] establishes a "framework of cooperation" regarding the maintenance of REP programs to ensure continued reasonable assurance. Under the MOU, FEMA is responsible for determining the adequacy of offsite REP plans and preparedness and providing its findings to the NRC "to make radiological health and safety decisions in the issuance of licenses and the continued operation of licensed plants." The NRC will be providing the proposed changes to the facilities that have interface with the State and local response organizations to FEMA for their review.

ENO's response dated May 21, 2014, apparently did not address this request. Please provide documentation that the affected State and local response organizations are in agreement with the proposed changes, or if not, please identify the areas of issues and how these issues are resolved.

Response

As discussed in the response to RAI-VY-013, reviews of the proposed changes for impact on their radiological emergency response plans by representatives from the emergency management agencies from Vermont, New Hampshire and Massachusetts was documented by email exchange. These emails have been provided to the NRC staff.

References

1. Letter, Entergy Nuclear Operations, Inc. to USNRC "Request for Approval of Certified Fuel Handler Training Program," BVY 13-095, dated October 31, 2013 (TAC No. MF2998) (ADAMS Accession No. ML13325B015)
2. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Proposed Changes to the Vermont Yankee Emergency Plan," BVY 14-018, dated March 24, 2014 (TAC No. MF3668) (ADAMS Accession No. ML14085A257)
3. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Proposed Changes to the Vermont Yankee Emergency Plan - Supplement 1 (TAC No. MF3668)," BVY 14-034, dated May 21, 2014 (ADAMS Accession No. ML14149A048)

Attachment 2

Vermont Yankee Nuclear Power Station

Revised SEP Pages

8.2.4. EOF Manager~~Deleted~~

~~The EOF Manager is a designated staff member of Vermont Yankee management specifically trained to be responsible for the facility Emergency Plan with respect to operation of the EOF/RC. The EOF Manager's primary responsibilities are to:~~

- ~~1. Establish the Emergency Operations Facility when required;~~
- ~~2. Assess Emergency Operations Facility habitability via the Radiological Assessment Coordinator;~~
- ~~3. Prepare the Emergency Operations Facility for the arrival of offsite authorities and other support personnel.~~

~~A designated Vermont Yankee management staff member assumes the role of the Emergency Operations Facility Manager at an Alert or higher emergency classification. The EOF Manager is responsible for reporting to the Emergency Director.~~

TABLE 8.3 (Continued)
(Page 2 of 3)

A SUMMARY OF OFFSITE COORDINATION

<u>EMERGENCY PLAN FUNCTION</u>	<u>PLANT RESPONSIBILITY</u>	<u>STATE RESPONSIBILITY</u>	<u>LOCAL RESPONSIBILITY</u>
Protective Action Decision Making (continued)		<p>Each State Health representative would call or report to the plant for the follow-up protective action recommendation issued by the Emergency Director.</p> <p>Each State Health representative will review all factors and issue a final recommendation to the Directors of State Emergency management Agencies, who, in turn, will initiate response actions to implement this recommendation.</p> <p>A coordination between the States will decide the time to implement the proposed actions, including activating the public alert and instructional methods (e.g., siren activation/NOA message, etc.)</p>	
Coordination of Radiological Data	<p>The Radiological Assessment Coordinator is responsible for compiling offsite monitoring results and for ensuring an effective deployment of monitoring personnel as well as coordinating information transfer.</p>	<p>Each State Health representative at the EOF/RC will request monitoring updates from the EOF-ManagerLead Offsite Liaison.</p> <p>In the State of Vermont, the Director of the Division of Occupational & Radiological Health & Safety will command this function at the State EOC.</p>	<p>Local communities rely on State capability for radiological evaluation.</p>

**Table 8.4
(Page 1 of 2)
MINIMUM STAFFING REQUIREMENTS FOR THE ENVY ERO**

FUNCTIONAL AREA	MAJOR TASKS	ENVY POSITION TITLE ¹	RESPONSE TIME
Plant Operations & Assessment of Operational Aspects		Shift Manager (1)	On Shift
		CRS/Certified Fuel Handler (CFH)**** (1)	On Shift
		CRO (2)	On Shift
		AO (6)AO/CRO/NCO**** (3)	On Shift
		STA (4)	On Shift
Emergency Direction & Control (Emergency Coordinator)***		Shift Manager (1**)	On Shift
Notification / Communication****	Notify Licensee, State local and federal personnel & maintain communication	STA/AO/CRS/CFH STA/Offsite Comm/ENS Comm/Chem.Tech (1) ³ STA/Offsite Comm/ENS Comm/Chem.Tech (2) ³	On Shift 30 min. 60 min.
Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Operations Facility (EOF) Director Offsite Dose assessment	EOF Emergency Director (1) Shift Mgr./CRS/CFH/STA/Chem.Tech RP Staff (1) ⁴	60 min. On Shift 30 min.
	Off site surveys	Field monitoring teams (2) Field monitoring teams (2)	30 min. 60 min.
	Onsite (out of plant)	Shift RP tech (4) Field monitoring teams (1) ³ Field monitoring teams (1)	On Shift 30 min. 60 min.
	In plant surveys	Shift RP Tech (1) RP staff (1) RP staff (1)	On Shift 30 min. 60 min.
	Chemistry / Radiochemistry	Shift Chem. Tech (1) Chem staff (1)	On Shift 60 min. 60 min.
	Plant System Engineering	Shift Technical Advisor Core/Thermal hydraulics	Positions not needed in a Permanently Defueled Condition STA (4) TSC RE (1) ³
Electrical		TSC Manager / TSC Engineering staff (1)	60 min.
Mechanical		TSC Manager / TSC Engineering staff (1)	60 min.
Repair & Corrective Actions		Mechanical Maintenance	Shift AO Shift AO/CRO/NCO (1**)
	Mechanical Maintenance	Maintenance (1)	60 min.
	Rad Waste operator	AO/CRO (4)AO/CRO/NCO	60 min.
	Electrical Maintenance / Instrumentation & Control Technician	Shift AO Shift AO/CRO/NCO (1**) Maintenance (1) Maintenance (1)	On Shift 30 min. 60 min.
	Instrumentation & Control Technician	Maintenance (1)	30 min.

43.12. The public information representative is notified and handles public information associated with the event; and

44.13. The Shift Manager terminates the Notification of Unusual Event status and closes out the event with a verbal summary to offsite authorities or escalates to higher level emergency classification.

9.2.1.1. Unusual Event (Terminated) Response

If a condition that warrants a Notification of Unusual Event declaration has occurred, and was immediately rectified such that the condition no longer existed by the time of declaration, this Notification of Unusual Event classification is referred to as an Unusual Event (Terminated).

The event or condition did not affect personnel onsite or the public offsite, or result in radioactive releases requiring offsite monitoring.

The response to this declaration of an Unusual Event (Terminated) is not as comprehensive as that for a Notification of Unusual Event. All the same notifications for a Notification of Unusual Event are made, and emergency response personnel reporting to the plant are based on specific requests of the SM.

9.2.2. Alert Response

An Alert requires actions to: 1) assure that sufficient emergency response personnel are mobilized to respond to the accident conditions at the site; and 2) that offsite emergency organizations are readily available to respond to the situation. Prompt notification is made to state officials and follow-up information is provided as needed to offsite emergency organizations. Unassigned personnel are evacuated from the site. In an Alert, the steps listed in the Notification of Unusual Event Response section (except for the termination process) and the following are performed:

1. The Alert emergency notification and response, as shown in Figure 9.1 and described in Table 9.1 are implemented;
2. The Technical Support Center, Operations Support Center, the Emergency Operations Facility/Recovery Center, and the Joint Information Center are activated by personnel as shown in Table 9.1;
3. If sufficient personnel are not available onsite, off-duty personnel are called in as specified in the emergency implementing procedures;
4. The Emergency Plant Manager reports to the Technical Support Center and directs in-plant emergency operations;
5. The ~~EOF Manager~~ Emergency Director establishes operations in the EOF/RC;

9.2.4. General Emergency Response

All Emergency Centers are activated and all available resources are called upon in the event of a General Emergency. The plant promptly notifies offsite authorities and initiates all emergency response organization capabilities.

Offsite authorities fully activate their emergency response and implement appropriate protective measures based on meteorological information, actual or projected radiological dose conditions and/or conditions. The Emergency Director and the entire emergency response organization assemble plant status parameters and continually advise offsite authorities of the type of public protective action most appropriate to the situation based on plant conditions and offsite dose projections. This includes whether to shelter or evacuate the affected towns within the plume exposure emergency planning zone. In a General Emergency, the steps listed in the Site Area Emergency Response section and the following are performed:

1. The Emergency Director may request that the ~~EOF Manager mobilize other personnel~~ be mobilized in support of Vermont Yankee through activation of the Corporate Emergency Center;
2. Other nuclear industry resources are alerted and requested to render appropriate assistance;
3. The full resources of the National Response Framework are activated; and
4. Dissemination of information and instructions associated with protective actions to the public is the principal focus of all response organizations. The plant fully participates in these efforts by providing detailed emergency condition information.

9.3. Emergency De-Escalation and Termination Criteria

Classification of an accident condition requires that the plant operation staff recognize that pre-established EALs associated with an emergency condition, as defined in Appendix A, have been reached or exceeded.

De-escalation criteria require (1) an extensive review of plant parameters and/or offsite radiological conditions in conjunction with the pre-established EALs; (2) review of plant and offsite conditions with offsite authorities; and (3) concurrence by offsite authorities as to the appropriate time frame required to implement de-escalation.

Attachment 3

Vermont Yankee Nuclear Power Station
Updated Tabular Summary of Proposed Changes to SEP

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
Table of Contents	--	Updated page numbers as necessary	Editorial revision to reflect changes described below.
Table of Contents – List of Figures	Figure 8.1 Normal On-Shift Emergency Organization	Figure 8.1 Defueled On-Shift Emergency Organization	VY will no longer be an operating nuclear power plant. The title change reflects the permanently defueled organizational structure.
Table of Contents – List of Figures	Figure 8.2 Vermont Yankee Emergency Management Organization	Figure 8.2 Vermont Yankee Defueled Emergency Management Organization	VY will no longer be an operating nuclear power plant. The title change reflects the permanently defueled organizational structure.
Table of Contents – List of Figures	Figure 8.3 Technical Support Center Emergency Organization	Figure 8.3 Defueled Technical Support Center Emergency Organization	VY will no longer be an operating nuclear power plant. The title change reflects the permanently defueled organizational structure.
Table of Contents – List of Figures	Figure 8.4 Operations Support Center Emergency Organization	(Deleted)	ERO Staffing changes result in one remaining OSC position (OSC Manager) illustrated on the figure. A figure is no longer necessary to describe the OSC organization.
Table of Contents – List of Figures	Figure 8.5 Emergency Operations Facility Organization	Figure 8.5 Defueled Emergency Operations Facility Organization	VY will no longer be an operating nuclear power plant. The title change reflects the permanently defueled organizational structure.
Table of Contents – List of Figures	Figure 8.7 Joint Information Center Organization	Figure 8.7 Defueled Joint Information Center Organization	VY will no longer be an operating nuclear power plant. The title change reflects the permanently defueled organizational structure.
Section 4.1	Vermont Yankee Nuclear Power Station is located on the west bank of the Connecticut River immediately upstream of the Vernon Hydrostation, in the town of Vernon, Vermont. The	Vermont Yankee Nuclear Power Station is located on the west bank of the Connecticut River immediately upstream of the Vernon Hydrostation, in the town of Vernon, Vermont. The	VY will no longer be an operating nuclear power plant. The Site Description has been revised to indicate the permanently shutdown

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
	<p>Vermont Yankee Nuclear Power Station is a boiling water reactor having a thermal rated power of 1912 MWt. The station, shown in Figure 4.1, is located on about 125 acres in Windham County, and is owned by Entergy, with the exception of a narrow strip of land between the Connecticut River and the Vermont Yankee property for which it has perpetual rights and easements from the owner, New England Power Company.</p>	<p>Vermont Yankee Nuclear Power Station ceased power operations and is permanently defueled in accordance with 10 CFR 50.82(a)(1)(i) and (ii). The station, shown in Figure 4.1, is located on about 125 acres in Windham County, and is owned by Entergy, with the exception of a narrow strip of land between the Connecticut River and the Vermont Yankee property for which it has perpetual rights and easements from the owner, New England Power Company.</p> <p>On September 23, 2013, ENO submitted a notification of permanent cessation of power operations pursuant to 10 CFR 50.82(a)(1)(i), stating that ENO has decided to permanently cease power operation of Vermont Yankee in the fourth quarter of 2014. ENO has submitted written certification to the NRC, in accordance with 10 CFR 50.82(a)(1) that meets the requirements of 10 CFR 50.4(b)(9) certifying that fuel has been permanently removed from the reactor vessel. Upon docketing of these certifications, the 10 CFR Part 50 license for VY no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel, as specified in 10 CFR 50.82(a)(2).</p> <p>With irradiated fuel being stored in the Spent Fuel Pool and the ISFSI, the</p>	<p>and defueled condition.</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
Section 4.2 – 2 nd Paragraph	<p>The nearest house is 1,300 feet from the Reactor Building and is one of several west of the site. The Vernon Elementary School (approximate enrollment of 250 pupils) is about 1,500 feet from the Reactor Building. The nearest hospital, Brattleboro Memorial, is approximately five (5) miles north-northwest from the site. The nearest dairy farm is approximately 1/2-mile northwest of the site. Additional dairy farms are located within a 5-mile radius of the plant. The largest sports facility in the vicinity is the Hinsdale Raceway, located approximately three (3) miles from the site. For racing events, the average attendance is approximately 4,000. A nursing home is located 2 miles south of the plant. These areas have been noted since they have required special planning consideration by offsite authorities in the event of a radiological emergency at Vermont Yankee.</p>	<p>reactor, reactor coolant system and secondary system are no longer in operation and have no function related to the storage of the irradiated fuel. Therefore, the postulated accidents involving failure or malfunction of the reactor and reactor coolant system or secondary system are no longer applicable.</p> <p>The nearest house is 1,300 feet from the Reactor Building and is one of several west of the site. The Vernon Elementary School (approximate enrollment of 250 pupils) is about 1,500 feet from the Reactor Building. The nearest hospital, Brattleboro Memorial, is approximately five (5) miles north-northwest from the site. The nearest dairy farm is approximately 1/2-mile northwest of the site. Additional dairy farms are located within a 5-mile radius of the plant. A nursing home is located 2 miles south of the plant. These areas have been noted since they have required special planning consideration by offsite authorities in the event of a radiological emergency at Vermont Yankee.</p>	<p>Editorial. The Hinsdale Raceway no longer operates and reference is removed from the Emergency Plan.</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
Section 8.1 – 2 nd Paragraph	<p>During normal operations, the minimum staff on duty at the plant during all shifts consists of one (1) Shift Manager, one (1) Control Room Supervisor, two (2) Control Room Operators, six (6) Auxiliary Operators, one (1) Shift Technical Advisor, one (1) Radiation Protection Technician, one (1) Chemistry Technician and security personnel as indicated in Figure 8.1. The responsibility for determining the status of the plant in an emergency is assigned to the Shift Manager or, in his absence from the Control Room, to the Control Room Supervisor who has the authority and responsibility to immediately initiate any emergency actions, including emergency classification and notification. Additional personnel are available on an on-call basis to respond to plant emergencies. Corrective action and repair, as outlined in Table 8.4, is performed by Operations staff on-shift until supplemented by additional ERO staff.</p>	<p>The minimum staff on duty at the plant during all shifts consists of one (1) Shift Manager, one (1) Control Room Supervisor (CRS)/Certified Fuel Handler (CFH), three (3) Auxiliary Operators (AO)/Control Room Operators (CRO)/Non-Certified Operators (NCO), one (1) Radiation Protection Technician and security personnel as indicated in Figure 8.1. The responsibility for determining the status of the plant in an emergency is assigned to the Shift Manager or, in his absence from the Control Room, to the Control Room Supervisor who has the authority and responsibility to immediately initiate any emergency actions, including emergency classification and notification. Additional personnel are available on an on-call basis to respond to plant emergencies. Corrective action and repair, as outlined in Table 8.4, is performed by Operations staff on-shift until supplemented by additional ERO staff.</p>	<p>VY will no longer be an operating nuclear power plant. The following on-shift positions will be eliminated:</p> <ul style="list-style-type: none"> • Shift Technical Advisor (STA) • Two (2) Control Room Operators • Three (3) Auxiliary Operators • Chemistry Technician <p>Following permanent cessation of operations and removal of fuel from the reactor vessel, Operations on-shift personnel will consist of one (1) Shift Manager (SM), one (1) Control Room Supervisor (CRS)/Certified Fuel Handler (CFH) and three (3) Auxiliary Operators (AOs)/Control Room Operators (CROs)/Non-Certified Operators (NCOs). Title changes for the CRS to CFH and the AO and CRO to NCO are dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs. These staffing levels have been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
Section 8.2.2 – 1 st Paragraph, Item 5	5. Develop guidance for plant shift operations concerning plant protection of the reactor core;	5. Develop guidance for plant shift operations concerning plant protection;	defueled condition. VY will no longer be an operating nuclear power plant and emplacement or retention of fuel into the reactor vessel will no longer be authorized. Therefore, the need for the Emergency Plant Manager’s responsibilities to include protection of the reactor core is no longer applicable.
Section 8.2.2 – 2 nd Paragraph	A qualified manager assumes the role of Emergency Plant Manager under all emergency conditions. To assist the Emergency Plant Manager, the TSC is staffed by representatives from the following departments as depicted in Figure 8.3: <ul style="list-style-type: none">• Operations• Maintenance• Reactor Engineering• Engineering• Chemistry (in the OSC)• Radiation Protection• Security (stationed at the off site command post)	A qualified manager assumes the role of Emergency Plant Manager under all emergency conditions. To assist the Emergency Plant Manager, the TSC is staffed by representatives from the following departments as depicted in Figure 8.3: <ul style="list-style-type: none">• Operations• Maintenance• Engineering• Chemistry• Radiation Protection• Security (stationed at the off site command post)	VY will no longer be an operating nuclear power plant and emplacement or retention of fuel into the reactor vessel will no longer be authorized. Therefore, the need to maintain a Reactor Engineer in the TSC is no longer applicable.
<u>Section 8.2.4</u>	<u>EOF Manager</u>	<u>Deleted entire section</u>	<u>The EOF Manager position will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the EOF.</u>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change																
<p><u>Table 8.3, Page 2 of 3</u></p>	<p>Each State Health representative at the EOF/RC will request monitoring updates from the EOF Manager.</p>	<p>Each State Health representative at the EOF/RC will request monitoring updates from the Lead Offsite Liaison.</p>	<p>The EOF Manager position will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the EOF.</p>																
<p>Table 8.3, Page 3 of 3</p>	<p>The Public Information Liaison at the EOF/RC relays accident status reports to the Joint Information Center.</p>	<p>The Technical Advisor at the EOF/RC relays accident status reports to the Joint Information Center.</p>	<p>The position of Public Information Liaison will not exist in the Permanently Defueled Emergency Response Organization (ERO). Duties and responsibilities will be transferred to the Technical Advisor position.</p>																
<p>Table 8.4 – Page 1 of 2, Functional Area - Plant Operations & Assessment of Operational Aspects</p>	<table border="1" data-bbox="706 1060 820 1491"> <tr><td>Shift Manager (1)</td><td>On Shift</td></tr> <tr><td>CRS (1)</td><td>On Shift</td></tr> <tr><td>CRO (2)</td><td>On Shift</td></tr> <tr><td>AO (6)</td><td>On Shift</td></tr> <tr><td>STA (1)</td><td>On Shift</td></tr> </table>	Shift Manager (1)	On Shift	CRS (1)	On Shift	CRO (2)	On Shift	AO (6)	On Shift	STA (1)	On Shift	<table border="1" data-bbox="706 598 779 1039"> <tr><td>Shift Manager (1)</td><td>On Shift</td></tr> <tr><td>CRS-Certified Fuel Handler (CFH)*** (1)</td><td>On Shift</td></tr> <tr><td>AO/CRO/NCO*** (3)</td><td>On Shift</td></tr> </table>	Shift Manager (1)	On Shift	CRS-Certified Fuel Handler (CFH)*** (1)	On Shift	AO/CRO/NCO*** (3)	On Shift	<p>VY will no longer be an operating nuclear power plant. The following on-shift positions will be eliminated:</p> <ul style="list-style-type: none"> • STA • Two (2) Control Room Operators • Three (3) Auxiliary Operators • Chemistry Technician <p>Following permanent cessation of operations and removal of fuel from the reactor vessel, Operations on-shift personnel will consist of the SM, one (1) CRS/CFH and three (3) AOs/CROs/NCOs. Title changes for the CRS to CFH and AO and CRO to NCO are dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with</p>
Shift Manager (1)	On Shift																		
CRS (1)	On Shift																		
CRO (2)	On Shift																		
AO (6)	On Shift																		
STA (1)	On Shift																		
Shift Manager (1)	On Shift																		
CRS-Certified Fuel Handler (CFH)*** (1)	On Shift																		
AO/CRO/NCO*** (3)	On Shift																		

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change												
			<p>references to CFHs and NCOs.</p> <p>These staffing levels have been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>STA oversight and technical knowledge in this functional area will be transferred to the Shift Manager and/or the CRS/CFH. This transfer of duties has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents previously submitted to the NRC.</p>												
<p>Table 8.4 – Page 1 of 2; Functional Area – Notification/Communication; Major Tasks – Notify Licensee, State, local and federal personnel & maintain communication</p>	<table border="1"> <tr> <td>STA; AO</td> <td>On Shift</td> </tr> <tr> <td>STA; Offsite Comm; ENS Comm; Chem; Tech (1) 2</td> <td>30 min</td> </tr> <tr> <td>STA; Offsite Comm; ENS Comm; Chem; Tech (2) 2</td> <td>60 min</td> </tr> </table>	STA; AO	On Shift	STA; Offsite Comm; ENS Comm; Chem; Tech (1) 2	30 min	STA; Offsite Comm; ENS Comm; Chem; Tech (2) 2	60 min	<table border="1"> <tr> <td>CRS/CFH</td> <td>On Shift</td> </tr> <tr> <td>Offsite Comm; ENS Comm (1) 2</td> <td>30 min</td> </tr> <tr> <td>Offsite Comm; ENS Comm (2) 2</td> <td>60 min</td> </tr> </table>	CRS/CFH	On Shift	Offsite Comm; ENS Comm (1) 2	30 min	Offsite Comm; ENS Comm (2) 2	60 min	<p>VY will no longer be an operating nuclear power plant. The STA position will be eliminated.</p> <p>Following permanent cessation of operations, the Chemistry Technician Position will not be responsible for performing notification/communications tasks.</p> <p>STA assignments in this functional area will be transferred to a CRS/CFH. This transfer of duties has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated</p>
STA; AO	On Shift														
STA; Offsite Comm; ENS Comm; Chem; Tech (1) 2	30 min														
STA; Offsite Comm; ENS Comm; Chem; Tech (2) 2	60 min														
CRS/CFH	On Shift														
Offsite Comm; ENS Comm (1) 2	30 min														
Offsite Comm; ENS Comm (2) 2	60 min														

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change												
			<p>accidents that will be applicable in the permanently defueled condition.</p> <p>Title change for the CRS to CFH is dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p>												
<p>Table 8.4 – Page 1 of 2; Functional Area – Radiological Accident Assessment and Support of Operational Accident Assessment; Major Tasks –Offsite Dose Assessment</p>	<table border="1" data-bbox="641 1060 722 1480"> <tr> <td data-bbox="641 1060 673 1480">EOP Emergency Director (1)</td> <td data-bbox="641 1102 673 1165">60 min</td> </tr> <tr> <td data-bbox="673 1060 706 1480">Shift Mgr/CRS/STA/Chem Tech</td> <td data-bbox="673 1102 706 1165">On Shift</td> </tr> <tr> <td data-bbox="706 1060 722 1480">RP Staff (1)*</td> <td data-bbox="706 1102 722 1165">30 min</td> </tr> </table>	EOP Emergency Director (1)	60 min	Shift Mgr/CRS/STA/Chem Tech	On Shift	RP Staff (1)*	30 min	<table border="1" data-bbox="641 604 722 1024"> <tr> <td data-bbox="641 604 673 1024">EOP Emergency Director (1)</td> <td data-bbox="641 646 673 709">60 min</td> </tr> <tr> <td data-bbox="673 604 706 1024">Shift Mgr/ CRS/CFH</td> <td data-bbox="673 646 706 709">On Shift</td> </tr> <tr> <td data-bbox="706 604 722 1024">RP Staff (1)*</td> <td data-bbox="706 646 722 709">30 min</td> </tr> </table>	EOP Emergency Director (1)	60 min	Shift Mgr/ CRS/CFH	On Shift	RP Staff (1)*	30 min	<p>VY will no longer be an operating nuclear power plant. The STA and on-shift Chemistry Tech positions will be eliminated.</p> <p>STA assignments in this functional area will be transferred to the Shift Manager and/or the Control Room Supervisor. This transfer of duties and removal of the on-shift Chemistry Tech position have been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>Title changes for the CRS to CFH is dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p>
EOP Emergency Director (1)	60 min														
Shift Mgr/CRS/STA/Chem Tech	On Shift														
RP Staff (1)*	30 min														
EOP Emergency Director (1)	60 min														
Shift Mgr/ CRS/CFH	On Shift														
RP Staff (1)*	30 min														

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change										
<p>Table 8.4 – Page 1 of 2; Functional Area – Radiological Accident Assessment and Support of Operational Accident Assessment; Major Tasks – Onsite (out of plant)</p>	<table border="1"> <tr> <td>Shift RP Tech (1)</td> <td>On Shift</td> </tr> <tr> <td>Field monitoring teams (1) ^a</td> <td>30 min</td> </tr> <tr> <td>Field monitoring teams (1)</td> <td>60 min</td> </tr> </table>	Shift RP Tech (1)	On Shift	Field monitoring teams (1) ^a	30 min	Field monitoring teams (1)	60 min	<table border="1"> <tr> <td>Field monitoring teams (1) ^a</td> <td>30 min</td> </tr> <tr> <td>Field monitoring teams (1)</td> <td>60 min</td> </tr> </table>	Field monitoring teams (1) ^a	30 min	Field monitoring teams (1)	60 min	<p>This change does not represent a change to the number of on-shift RP Technicians. The number of on-shift RP Technicians remains one (1). The change is intended to clarify VY's RP Technician duties during an emergency, consistent with Table B-1 of NUREG-0654.</p> <p>Table B-1 of NUREG-0654 does not identify an on-shift position responsible for "onsite (out of plant)" surveys. During the initial stages of an emergency, the on-shift RP Technician will be assigned to the most critical tasks during the emergency response. VY maintains the capability to augment on-shift staff with field monitoring teams to perform this task within 30 minutes of notification of an emergency declaration.</p>
Shift RP Tech (1)	On Shift												
Field monitoring teams (1) ^a	30 min												
Field monitoring teams (1)	60 min												
Field monitoring teams (1) ^a	30 min												
Field monitoring teams (1)	60 min												
<p>Table 8.4 – Page 1 of 2; Functional Area – Radiological Accident Assessment and Support of Operational Accident Assessment; Major Tasks – Chemistry/Radiochemistry</p>	<table border="1"> <tr> <td>Shift Chem Tech (1)</td> <td>On Shift</td> </tr> <tr> <td>Chem staff (1)</td> <td>60 min</td> </tr> </table>	Shift Chem Tech (1)	On Shift	Chem staff (1)	60 min	<table border="1"> <tr> <td>Chem staff (1)</td> <td>60 min</td> </tr> </table>	Chem staff (1)	60 min	<p>VY will no longer be an operating nuclear power plant. The on-shift Chemistry Tech position will be eliminated.</p> <p>Removal of the on-shift Chemistry Tech position has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p>				
Shift Chem Tech (1)	On Shift												
Chem staff (1)	60 min												
Chem staff (1)	60 min												

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change					
Table 8.4 – Page 1 of 2; Functional Area – Plant System Engineering; Major Tasks – Shift Technical Advisor and Core Thermal Hydraulics	<table border="1" data-bbox="282 1056 331 1480"> <tr> <td>STA (1)</td> <td>On Shift</td> </tr> <tr> <td>TSC RE (1)</td> <td>30 min.</td> </tr> </table>	STA (1)	On Shift	TSC RE (1)	30 min.	<table border="1" data-bbox="282 600 331 1024"> <tr> <td>Positions not needed in a Permanently Defueled Condition</td> </tr> </table>	Positions not needed in a Permanently Defueled Condition	<p>VY will no longer be an operating nuclear power plant. The STA position will be eliminated.</p> <p>STA oversight and technical knowledge in this functional area will be transferred to the Shift Manager and/or the CRS/CFH. This transfer of duties has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>Additionally, the need to maintain a Reactor Engineer in the TSC is no longer applicable.</p>
STA (1)	On Shift							
TSC RE (1)	30 min.							
Positions not needed in a Permanently Defueled Condition								
Table 8.4 – Page 1 of 2; Functional Area – Repair & Corrective Actions; Major Tasks – Mechanical Maintenance	<table border="1" data-bbox="888 1056 920 1480"> <tr> <td>Shift AO (1)</td> <td>On Shift</td> </tr> </table>	Shift AO (1)	On Shift	<table border="1" data-bbox="888 600 920 1024"> <tr> <td>Shift AO/CRO/NCO(1)</td> <td>On Shift</td> </tr> </table>	Shift AO/CRO/NCO(1)	On Shift	<p>The Defueled Organization contains three (3) AOs/CROs/NCOs on-shift. This on-shift complement has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>Title change for the AO and CRO to NCO is dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p>	
Shift AO (1)	On Shift							
Shift AO/CRO/NCO(1)	On Shift							

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change												
<p>Table 8.4 – Page 1 of 2; Functional Area – Repair & Corrective Actions; Major Tasks – Rad Waste Operator</p>	<table border="1" data-bbox="282 1062 315 1482"> <tr> <td>AO/CRO (1)</td> <td>60 min</td> </tr> </table>	AO/CRO (1)	60 min	<table border="1" data-bbox="282 604 315 1024"> <tr> <td>AO/CRO/NCO</td> <td>60 min</td> </tr> </table>	AO/CRO/NCO	60 min	<p>The CRO position is eliminated in the post-shutdown condition. The Defueled Organization consists of three (3) AOs/CROs/NCOs on-shift. This on-shift complement has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>Title change for the AO and CRO to NCO is dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p>								
AO/CRO (1)	60 min														
AO/CRO/NCO	60 min														
<p>Table 8.4 – Page 1 of 2; Functional Area – Repair & Corrective Actions; Major Tasks – Electrical Maintenance/Instrumentation & Control Technician</p>	<table border="1" data-bbox="906 1062 971 1482"> <tr> <td>Shift AO (1**)</td> <td>On Shift</td> </tr> <tr> <td>Maintenance (1)</td> <td>30 min</td> </tr> <tr> <td>Maintenance (1)</td> <td>60 min</td> </tr> </table>	Shift AO (1**)	On Shift	Maintenance (1)	30 min	Maintenance (1)	60 min	<table border="1" data-bbox="906 604 971 1024"> <tr> <td>Shift AO/CRO/NCO (1**)</td> <td>On Shift</td> </tr> <tr> <td>Maintenance (1)</td> <td>30 min</td> </tr> <tr> <td>Maintenance (1)</td> <td>60 min</td> </tr> </table>	Shift AO/CRO/NCO (1**)	On Shift	Maintenance (1)	30 min	Maintenance (1)	60 min	<p>The Defueled Organization consists of three (3) AOs/CROs/NCOs on-shift. This on-shift complement has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>Title change for the AO and CRO to NCO is dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p>
Shift AO (1**)	On Shift														
Maintenance (1)	30 min														
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Shift AO/CRO/NCO (1**)	On Shift														
Maintenance (1)	30 min														
Maintenance (1)	60 min														

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
<p>Table 8.4 – Page 2 of 2; Functional Area – Protective Actions (in Plant); Major Tasks – Radiation Protection, access control, HP, coverage for repair, corrective actions, search & rescue, first aid & firefighting, personnel monitoring, dosimetry</p>	<p>Shift AO (2*) RP (2) RP (2)</p> <p>On Shift 30 min 60 min</p>	<p>Shift AO/CRO/NCO(2*) RP (2) RP (2)</p> <p>On Shift 30 min 60 min</p>	<p>The Defueled Organization consists of three (3) AOs/CROs/NCOs on-shift. This on-shift complement has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>Title change for the AO and CRO to NCO is dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p>
<p>Table 8.4, Note ****</p>	<p>May be performed by engineering aide to Shift Manager (STA for ENVY)</p>	<p>Title Change is dependent on NRC approval of revised Technical Specifications (BVV 13-096, dated 10/31/13). CFHs will supervise fuel handling operations in the permanently defueled condition. The CRS and SM will be qualified as CFHs. However, the SM requires additional qualification beyond the CFH training. Therefore, any reference to the CFH position throughout this Plan is considered to be equivalent to the CRS position. Non-Certified Operators will perform duties typically associated with those performed by Auxiliary Operators and Control Room Operators, such as manipulation and monitoring of plant equipment.</p>	<p>VY will no longer be an operating nuclear power plant. The STA position will be eliminated. STA oversight and technical knowledge will be transferred to the Shift Manager and/or the CRS/CFH. This transfer of duties has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>Title changes for the CRS to CFH and AO and CRO to NCO are dependent upon NRC approval of proposed changes to the VY Technical Specifications that</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
Table 8.4, Note 1	<p>AP 0894 specifies minimum shift staffing requirements. FB requires 5 persons per TRM and the Vermont Yankee Nuclear Power Station On-Shift Staffing Analysis. The staffing analysis is maintained as a controlled document and is effective 30 days after OSRC approval. STA and Chemistry Tech must be available within 10 minutes to the Control Room. VY letter to NRC dated 4/14/1981 (FVY 81-65) establishing position. VY letter to NRC 6/22/1982 (FVY 82-75) Supplement – NUREG 0737 Item III.A.1.2 on training of on-shift staff to support VY position for staffing. VY letter to NRC 4/14/1981 (FVY 81-65) TMI Action Plan Item III.A.1.2, goal for augmentation of staff. VY letter to NRC 6/15/82 (FVY 82-70) Results of Augmentation drills to support use of goals. Titles of ENVY ERO positions are shown.</p>	<p>AP 0894 specifies minimum shift staffing requirements. FB requires 5 persons per TRM and the Vermont Yankee Nuclear Power Station Analysis of Proposed Post-Shutdown On-Shift Staffing. The staffing analysis was evaluated to reflect VY's permanently shutdown and defueled conditions, including the on-shift staff composition and revised accident analyses.</p>	<p>replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p> <p>The Defueled on-shift staffing has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p>
Table 8.4, Note 2	<p>All AOs use digital dosimeters with features for dose rate and total dose monitoring. AOs are trained to self-monitor in an emergency.</p>	<p>All AOs/CROs/NCOs use digital dosimeters with features for dose rate and total dose monitoring. AOs/CROs/NCOs are trained to self-monitor in an emergency.</p>	<p>Title change for the AOs and CROs to NCO is dependent upon NRC approval of proposed changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p>
Table 8.4, Note 3	<p>ENVY has designated pager holders who staff positions required to meet</p>	<p>ENVY has designated ERO members who staff positions required to meet</p>	<p>The Defueled Organization will consist of fewer than 4 teams</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
	<p>minimum staffing to activate TSC, OSC and EOF (see E Plan Figures 8.3 through 8.5). There are a minimum of 4 persons per position (4 teams who rotate duty). However, all persons on teams are expected to respond. In addition, all other ERO personnel not on pagers are notified by the emergency call-in notification system and are expected to respond.</p>	<p>minimum staffing to activate the TSC, OSC and EOF. The minimum staff positions required to activate the TSC and EOF are shown in E Plan Figures 8.3 and 8.5. The OSC Manager is the only position required to activate and staff the OSC. All ERO personnel are expected to respond when notified by the emergency call-in notification system.</p>	<p>rotating ERO duty. Additional changes to this note are editorial to remove references to pagers and pager holders.</p>
Table 8.4, Note 4	<p>The on-shift Shift Manager, CRS, STA, and Chem Tech have the capability to do initial dose assessment and PAR. The TSC and EOF radiation assessment staff relieves them of this function.</p>	<p>The on-shift Shift Manager and CRS have the capability to do initial dose assessment and PAR. The TSC and EOF radiation assessment staff relieves them of this function.</p>	<p>VY will no longer be an operating nuclear power plant. The STA and on-shift Chemistry Technician positions will be eliminated.</p>
Figure 8.1	<p>Normal On-Shift Emergency Organization</p>	<p>Replaced figure with "Defueled On-Shift Emergency Organization" figure. Deleted the following positions:</p> <ul style="list-style-type: none"> • Shift Technical Advisor • Chem Tech • Control Room Operators <p>Replaced "Auxiliary Operators" with "AOs/CROs/NCOs"</p>	<p>VY will no longer be an operating nuclear power plant. The following on-shift positions will be eliminated:</p> <ul style="list-style-type: none"> • STA • Two (2) Control Room Operators • Three (3) Auxiliary Operators • Chemistry Technician <p>Following permanent cessation of operations and removal of fuel from the reactor vessel, Operations on-shift personnel will consist of the (SM, one (1) CRS/ CFH and three (3) AOs/CROs/NCOs. Title changes for the CRS to CFH and AO and CRO to NCO are dependent upon NRC approval of proposed</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
			<p>changes to the VY Technical Specifications that replace references to licensed and non-licensed operators with references to CFHs and NCOs.</p> <p>These staffing levels have been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p> <p>STA oversight and technical knowledge in this functional area will be transferred to the Shift Manager and/or the CRS/CFH. This transfer of duties has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents previously submitted to the NRC.</p>
Figure 8.2	VY Emergency Management Organization	<p>Replaced figure with "VY Defueled Emergency Management Organization"</p> <p>Deleted the following positions:</p> <ul style="list-style-type: none"> • EOF Manager • TSC Manager 	<p>The positions of EOF Manager and TSC Manager will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within each Emergency Response Facility.</p>
Figure 8.3	Technical Support Center Emergency Organization	<p>Replaced figure with "Defueled Technical Support Center Emergency Organization"</p> <p>Deleted the following positions:</p>	<p>The TSC positions identified for deletion will not exist in the Permanently Defueled ERO. Duties and responsibilities will be</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
Figure 8.4	Operations Support Center Emergency Organization	<ul style="list-style-type: none"> • TSC Manager • TSC Communicator • Mechanical Engineer • Reactor Engineer • Electrical /I&C Engineers • IT Specialist Deleted figure	transferred to remaining positions within the TSC. ERO Staffing changes result in one remaining OSC position (OSC Manager) – A figure is no longer necessary to describe the OSC organization.
Figure 8.5	Emergency Operations Facility Organization	Replaced figure with “Defueled Emergency Operations Facility Organization” Deleted the following positions: <ul style="list-style-type: none"> • EOF Manager • EOF Communicator • Public Information Liaison • EOF Log Keeper • IT Specialist 	The EOF positions identified for deletion will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the EOF.
Figure 8.7	Joint Information Center Organization	Replaced figure with “Defueled Joint Information Center Organization” Deleted the following positions: <ul style="list-style-type: none"> • Information Coordinator • Technical Assistant • Credentialing • Press Release Writer • Logistics Coordinator • Inquiry Response Coordinator • Media Monitoring • JIC Log Keeper 	The JIC positions identified for deletion will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the JIC.

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
Section 9.2.1 – 2 nd Paragraph	<p>3. The Shift Technical Advisor reports to the Control Room and provides technical support as necessary;</p>	<ul style="list-style-type: none"> • Inquiry Responders Deleted 	<p>VY will no longer be an operating nuclear power plant. The STA position will be eliminated.</p> <p>STA assignments in this functional area will be transferred to a CRS/CFH. This transfer of duties has been evaluated in the VY analysis of proposed post-shutdown on-shift staffing in conjunction with the postulated accidents that will be applicable in the permanently defueled condition.</p>
Section 9.2.2	<p>5. The EOF Manager establishes operations in the EOF/RC;</p>	<p>5. <u>The Emergency Director establishes operations in the EOF/RC;</u></p>	<p>The EOF Manager position will <u>not</u> exist in the Permanently Defueled ERO. <u>Duties and responsibilities will be transferred to remaining positions within the EOF.</u></p>
Section 9.2.4 – 2 nd Paragraph	<p>1. The Emergency Director may request that the EOF Manager mobilize other personnel in support of Vermont Yankee through activation of the Corporate Emergency Center.</p>	<p>1. <u>The Emergency Director may request that other personnel be mobilized in support of Vermont Yankee through activation of the Corporate Emergency Center.</u></p>	<p>The EOF Manager position will <u>not</u> exist in the Permanently Defueled ERO. <u>Duties and responsibilities will be transferred to remaining positions within the EOF.</u></p>
Section 9.3 – 3 rd Paragraph	<p>De-escalation from a Notification of Unusual Event to a recovery phase requires satisfying the following criteria:</p> <ol style="list-style-type: none"> 1. Criticality controls are in effect; 2. The core is being adequately cooled; 	<p>De-escalation from a Notification of Unusual Event to a recovery phase requires satisfying the following criteria:</p> <ol style="list-style-type: none"> 1. Criticality controls are in effect; 2. The fission product release has been controlled; 	<p>VY will no longer be an operating nuclear power plant and emplacement or retention of fuel into the reactor vessel will no longer be authorized. Therefore, the need for adequate core cooling, control over containment pressure and temperature and control of reactor coolant system pressure is</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
	<p>3. The fission product release has been controlled;</p> <p>4. Control has been established over containment pressure and temperature;</p> <p>5. An adequate heat transfer path to an ultimate heat sink has been established;</p> <p>6. Reactor coolant system pressure is under control; and/or</p> <p>7. Notification of Unusual Event conditions have been reviewed, and are not expected to deteriorate further.</p>	<p>3. An adequate heat transfer path to an ultimate heat sink has been established;</p> <p>4. Notification of Unusual Event conditions have been reviewed, and are not expected to deteriorate further.</p>	not necessary.
Table 9.1, Technical Support Center; Alert or Site Area Emergency or General Emergency Column	<p>Emergency Plant Manager</p> <p>TSC Manager</p> <p>Maintenance Coordinator (Electrical/Mechanical/I&C)</p> <p>Radiological Coordinator</p> <p>Reactor Engineer</p> <p>Engineering Coordinator(Project, System, Design)</p> <p>Operations Coordinator</p> <p>Engineering Support Group</p>	<p>Emergency Plant Manager</p> <p>Maintenance Coordinator (Electrical/Mechanical/I&C)</p> <p>Radiological Coordinator</p> <p>Engineering Coordinator(Project, System, Design)</p> <p>Operations Coordinator</p>	The TSC positions identified for deletion will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the TSC.
Table 9.1, Operations Support Center; Alert or Site Area Emergency or General Emergency	<p>OSC Manager</p> <p>Radiation Protection Staff</p> <p>Chemistry Staff</p>	<p>OSC Manager</p> <p>Radiation Protection Staff</p> <p>Chemistry Staff</p>	<p>VV will no longer be an operating nuclear power plant. Use of the term "licensed" is no longer appropriate.</p> <p>The OSC positions identified for</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
	<p>Spare Licensed Operators</p> <p>Spare Auxiliary Operators</p> <p>Control Instrument Specialists</p> <p>Plant Mechanics</p>	<p>Spare AOs/CROs/NCOs</p> <p>Control Instrument Specialists</p> <p>Plant Mechanics</p>	<p>deletion will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the OSC.</p>
<p>Table 9.1, Emergency Operations Facility/Recovery Center; Alert or Site Area Emergency or General Emergency Column</p>	<p>Emergency Director</p> <p>Offsite Communicator</p> <p>Technical Advisor</p> <p>EOF Manager</p> <p>Administration and Logistics Coordinator</p> <p>Radiological Assessment Coordinator</p> <p>Personnel & Equipment Monitor</p> <p>*Site/Offsite Monitoring Teams</p> <p>Public Information Liaison</p>	<p>Emergency Director</p> <p>Offsite Communicator</p> <p>Technical Advisor</p> <p>Administration and Logistics Coordinator</p> <p>Radiological Assessment Coordinator</p> <p>*Site/Offsite Monitoring Teams</p>	<p>The EOF positions identified for deletion will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the EOF.</p>
<p>Table 9.1, Joint Information Center; Alert or Site Area Emergency or General Emergency</p>	<p>Company Spokesperson</p> <p>VY Public Information Staff</p> <p>Nuclear Public Information Representatives</p> <p>Joint Information Center Staff</p>	<p>Company Spokesperson</p>	<p>The JIC positions identified for deletion will not exist in the Permanently Defueled ERO. Duties and responsibilities will be transferred to remaining positions within the JIC.</p>
<p>Section 10.2 – 1st Paragraph</p>	<p>In the event a General Emergency has been declared, Vermont Yankee immediately recommends protective actions to state authorities based on plant conditions which include the status of core and containment conditions. At a minimum, the Shift Manager or Emergency Director, who is</p>	<p>In the event a General Emergency has been declared, Vermont Yankee immediately recommends protective actions to state authorities based on plant conditions. At a minimum, the Shift Manager or Emergency Director, who is in charge of the emergency response activities, recommends that</p>	<p>VY will no longer be an operating nuclear power plant and emplacement or retention of fuel into the reactor vessel will no longer be authorized. Therefore, the need to communicate the status of the core and containment conditions is not necessary.</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
	<p>in charge of the emergency response activities, recommends that the general public be advised to seek shelter for the towns of Hinsdale, New Hampshire and Vernon, Vermont; and the towns located five miles downwind in the affected sectors.</p>	<p>the general public be advised to seek shelter for the towns of Hinsdale, New Hampshire and Vernon, Vermont; and the towns located five miles downwind in the affected sectors.</p>	
<p>Section 10.2 – 2nd Paragraph</p>	<p>If plant conditions indicate a severe reactor accident exists involving actual or projected substantial core damage, Vermont Yankee recommends to the appropriate state officials evacuation of the towns of Hinsdale, New Hampshire and Vernon, Vermont; and all towns located five miles downwind in the affected sectors.</p>	<p>If plant conditions indicate a severe accident exists, Vermont Yankee recommends to the appropriate state officials evacuation of the towns of Hinsdale, New Hampshire and Vernon, Vermont; and all towns located five miles downwind in the affected sectors.</p>	<p>VY will no longer be an operating nuclear power plant and emplacement or retention of fuel into the reactor vessel will no longer be authorized. Therefore, an accident involving the reactor the potential for actual or projected substantial core damage no longer exists.</p>
<p>Section 10.3 – 2nd Paragraph</p>	<p>Table 10.2 specifies the guidelines on emergency dose limits for personnel providing emergency response duties which is consistent with the Environmental Protection Agency Emergency Worker Dose Limit Guides (EPA 400-R-92-001). The Shift Manager initially has the responsibility to authorize emergency dose commitments until relieved by the Emergency Plant Manager. This authorization is coordinated with the assistance of the Radiological Coordinator or Shift Chemistry and Radiation Protection Technicians as needed. Exposure to individuals providing emergency functions will be consistent with the limits specified in</p>	<p>Table 10.2 specifies the guidelines on emergency dose limits for personnel providing emergency response duties which is consistent with the Environmental Protection Agency Emergency Worker Dose Limit Guides (EPA 400-R-92-001). The Shift Manager initially has the responsibility to authorize emergency dose commitments until relieved by the Emergency Plant Manager. This authorization is coordinated with the assistance of the Radiological Coordinator and Radiation Protection Technicians as needed. Exposure to individuals providing emergency functions will be consistent with the limits specified in Table 10.2 with every</p>	<p>VY will no longer be an operating nuclear power plant. The on-shift Chemistry Technician positions will be eliminated.</p>

Emergency Plan Section	Before (Rev. 54)	After	Reason for Change
	Table 10.2 with every attempt made to keep exposures ALARA.	attempt made to keep exposures ALARA.	
Section 11.3 – 4 th Paragraph	The Public Information Liaison and required staff report to the EOF/RC for coordinating the accident information between the plant and the Joint Information Center.	The Technical Advisor and required staff report to the EOF/RC for coordinating the accident information between the plant and the Joint Information Center.	The Technical Advisor will assume this duty in the permanently defueled condition.