

<b>Procedure/Document Number: AP-10049</b>	<b>Revision: 4</b>
<b>Equipment/Facility/Other: Vermont Yankee</b>	
<b>Title: Equipment Important to Emergency Response</b>	

**Part I. Description of Activity Being Reviewed** (event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan):

This screening addresses the enhancements to AP-10049, "Equipment Important to Emergency Response," to align with Vermont Yankee's SAFSTOR organization and to identify changes being made to plant equipment resulting from VY's permanently shutdown and defueled condition.

On January 12, 2015, Entergy certified to the NRC by letter (BVY 15-001) that a determination to permanently cease operations at Vermont Yankee (VY) was made on December 29, 2014, which was the date on which power operations ceased. Pursuant to 10 CFR 50.82(a)(1)(ii), Entergy also certified that the fuel has been permanently removed from the reactor vessel and placed in the Spent Fuel Pool (SFP). Once VY docketed the certifications required by 10 CFR 50.82(a)(1), the 10 CFR Part 50 license no longer authorized operation of the reactor or placement or retention of fuel in the reactor vessel, in accordance with 10 CFR 50.82(a)(2). Based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) that operation of the reactor or emplacement or retention of fuel into the reactor vessel is prohibited, and provided that an acceptable evaluation, e.g., pursuant to 10 CFR 50.54(q)(3), has been performed, Vermont Yankee will remove from service those systems and equipment that: support operation of the reactor; are not required to prevent or mitigate the consequences of a fuel handling accident in the SFP; are not required to support SFP cooling operations; and are not necessary to classify an EAL applicable in the defueled (DEF) mode.

For those systems not required in a permanently shutdown and defueled condition, VY will initiate the abandonment process, but the abandonment process will not be completed, such that the function is capable of being restored until the function is no longer required (e.g. following NRC approval and subsequent implementation of VY's Permanently Defueled Emergency Plan and EAL Scheme – Refer to BVY 14-033). Separate 50.54(q) evaluations will be completed to evaluate whether initiating the retirement of specific equipment or systems constitutes a reduction in the effectiveness of the Emergency Plan.

**Part II. Activity Previously Reviewed?**

Is this activity fully bounded by an NRC approved 10 CFR 50.90 submittal or Alert and Notification System Design Report?

If YES, identify bounding source document number/approval reference and ensure the basis for concluding the source document fully bounds the proposed change is documented below:

**Justification:**

Bounding document attached (optional)

<input type="checkbox"/> YES 50.54(q)(3) Evaluation is NOT required. Enter justification below and complete Part VI.	<input checked="" type="checkbox"/> NO Continue to next part
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**Part III. Applicability of Other Regulatory Change Control Processes**

Check if any other regulatory change processes control the proposed activity.(Refer to EN-LI-100)

**NOTE:** For example, when a design change is the proposed activity, consequential actions may include changes to other documents which have a different change control process and are **NOT** to be included in this 50.54(q)(3) Screening.

**APPLICABILITY CONCLUSION**

- If there are no controlling change processes, continue the 50.54(q)(3) Screening.
- One or more controlling change processes are selected, however, some portion of the activity involves the emergency plan or affects the implementation of the emergency plan; continue the 50.54(q)(3) Screening for that portion of the activity. Identify the applicable controlling change processes below.
- One or more controlling change processes are selected and fully bounds all aspects of the activity. 50.54(q)(3) Evaluation is NOT required. Identify controlling change processes below and complete Part VI.

**CONTROLLING CHANGE PROCESSES**

10 CFR 50.54(q)

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<b>Part IV. Editorial Change</b> Is this activity an editorial or typographical change such as formatting, paragraph numbering, spelling, or punctuation that does not change intent? <b>Justification:</b>	<input type="checkbox"/> YES 50.54(q)(3) Evaluation is NOT required. Enter justification and complete Part VI.	<input checked="" type="checkbox"/> NO Continue to next part
	<b>Part V. Emergency Planning Element/Function Screen</b> (Associated 10 CFR 50.47(b) planning standard function identified in brackets) Does this activity affect any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II?	

1. Responsibility for emergency response is assigned. [1]	<input type="checkbox"/>
2. The response organization has the staff to respond and to augment staff on a continuing basis (24/7 staffing) in accordance with the emergency plan. [1]	<input type="checkbox"/>
3. The process ensures that on shift emergency response responsibilities are staffed and assigned. [2]	<input type="checkbox"/>
4. The process for timely augmentation of onshift staff is established and maintained. [2]	<input type="checkbox"/>
5. Arrangements for requesting and using off site assistance have been made. [3]	<input type="checkbox"/>
6. State and local staff can be accommodated at the EOF in accordance with the emergency plan. [3]	<input type="checkbox"/>
7. A standard scheme of emergency classification and action levels is in use. [4]	<input type="checkbox"/>
8. Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications. [5]	<input type="checkbox"/>
9. Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. [5]	<input type="checkbox"/>
10. The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter. [5]	<input type="checkbox"/>
11. Systems are established for prompt communication among principal emergency response organizations. [6]	<input type="checkbox"/>
12. Systems are established for prompt communication to emergency response personnel. [6]	<input type="checkbox"/>
13. Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ). [7]	<input type="checkbox"/>
14. Coordinated dissemination of public information during emergencies is established. [7]	<input type="checkbox"/>
15. Adequate facilities are maintained to support emergency response. [8]	<input type="checkbox"/>
16. Adequate equipment is maintained to support emergency response. [8]	<input checked="" type="checkbox"/>
17. Methods, systems, and equipment for assessment of radioactive releases are in use. [9]	<input type="checkbox"/>
18. A range of public PARs is available for implementation during emergencies. [10]	<input type="checkbox"/>
19. Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities. [10]	<input type="checkbox"/>
20. A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.[10]	<input type="checkbox"/>
21. The resources for controlling radiological exposures for emergency workers are established. [11]	<input type="checkbox"/>

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22. Arrangements are made for medical services for contaminated, injured individuals. [12]	<input type="checkbox"/>
23. Plans for recovery and reentry are developed. [13]	<input type="checkbox"/>
24. A drill and exercise program (including radiological, medical, health physics and other program areas) is established. [14]	<input type="checkbox"/>
25. Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses. [14]	<input type="checkbox"/>
26. Identified weaknesses are corrected. [14]	<input type="checkbox"/>
27. Training is provided to emergency responders. [15]	<input type="checkbox"/>
28. Responsibility for emergency plan development and review is established. [16]	<input type="checkbox"/>
29. Planners responsible for emergency plan development and maintenance are properly trained. [16]	<input type="checkbox"/>

**APPLICABILITY CONCLUSION**

If no Part V criteria are checked, a 50.54(q)(3) Evaluation is NOT required; document the basis for conclusion below and complete Part VI.




If any Part V criteria are checked, complete Part VI and perform a 50.54(q)(3) Evaluation.

**BASIS FOR CONCLUSION**

This screening and subsequent 50.54(q) evaluation addresses the impact of the enhancements to AP-10049 to align with VY's SAFSTOR Organization and changes to equipment important to emergency response resulting from VYs permanently shutdown and defueled condition. Emergency Planning Standard 10 CFR 50.47(b)(8) and planning standard element 16 in Part V of this form are affected by the enhancements to AP-10049. A 10 CFR 50.54(q) Evaluation will be performed to determine whether the effectiveness of the Emergency Plan is reduced and prior NRC approval is required.

Separate 50.54(q) evaluations will be completed to evaluate whether initiating the retirement of specific equipment or systems constitutes a reduction in the effectiveness of the Emergency Plan.

**Part VI. Signatures:**

Preparer Name (Print) David L. Daigle	Preparer Signature 	Date: 04/02/2015
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Tom Sowdon Nuclear EP Project Manager	Reviewer Signature 	Date: 4-6-2015
Approver Name (Print) Mike McKenney EP Manager or designee	Approver Signature 	Date: 4/6/15

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**Part I. Description of Proposed Change:**

AP-10049, "Equipment Important to Emergency Response," has been revised to align with Vermont Yankee's SAFSTOR organization and identify changes being made to plant equipment resulting from VYs permanently shutdown and defueled condition.

AP-10049 has been revised: 1) for consistency with the VY SAFSTOR Organization; 2) to identify specific systems and equipment not used in the permanently defueled condition; 3) to identify systems and equipment for which Compensatory Measures are no longer required based on the permanently defueled condition; 4) to identify Emergency Action Levels (EALs) no longer possible in the permanently defueled condition based on Mode Applicability; 5) to update procedure numbers. In addition, AP-10049 is being revised to replace references to Offsite Dose Projection System (ODPS) and METPAC with the Unified Rascal Interface (URI) (A separate 50.54(q) has already been performed to evaluate the change to URI.); and 6) to update the Compensatory Measure for Fire Detection Equipment.

A detailed listing of changes to AP-10049 is provided in Attachment 1.

**Part II. Description and Review of Licensing Basis Affected by the Proposed Change:**

AP-10049 is a site-specific procedure that identifies equipment that is important to emergency response at Vermont Yankee. Equipment identified in this procedure has been selected because of its role in emergency preparedness activities or its use in declaring an EAL. A detailed listing of changes to AP-10049 is provided in Attachment 1.

No other licensing basis documents are affected by the enhancements to AP-10049.

**Part III. Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC:**

**10 CFR 50.47(b)(8):** *Adequate emergency facilities and equipment to support the emergency response are provided and maintained.*

**Site Compliance:** AP-10049 is a site-specific procedure that identifies equipment that is important to emergency response at Vermont Yankee. Equipment identified in this procedure has been selected because of its role in emergency preparedness activities or its use in declaring an EAL. Revising AP-10049 as proposed to address changes made to plant equipment resulting from VY's permanently shutdown and defueled condition will have no impact on the adequacy of facilities or equipment necessary to support the emergency response in the permanently shutdown and defueled condition. The procedure, as revised, identifies equipment no longer used in the permanently defueled condition and identifies EALs that cannot be declared while in the DEF mode. Based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) that operation of the reactor or emplacement or retention of fuel into the reactor vessel is prohibited, the reactor cannot be in a mode other than DEF and Compensatory Measures associated with the equipment no longer used is no longer necessary.

LBDCR# FCR 27/006 was developed to track the revision of Vermont Yankee UFSAR Section 14 (Station Safety Analysis) to remove information rendered obsolete by system abandonments resulting from the permanent cessation of power operations and permanent removal of fuel from the VY reactor vessel. The change removes the Abnormal Operational Transients (AOTs) and Design Basis Accident (DBA) scenarios that will no longer be applicable in the permanently defueled condition. The change also revises the description of the remaining applicable DBA - a fuel handling accident (FHA) over the Spent Fuel Pool (SFP). The change to Section 14 of the UFSAR was approved on March 12, 2015. Revision to AP-10049 address equipment not be used to detect, assess or monitor a release resulting from a fuel handling accident in the SFP, the remaining applicable Design Basis Accident (DBA).

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**10 CFR Part 50, Appendix E Section IV.E.2:** Adequate provisions shall be made and described for emergency facilities and equipment, including: Equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment.

**Site Compliance:** Revising AP-10049 as proposed will have no impact on the ability of operators to determine the magnitude or to continuously assess the impact of the release of radioactive materials to the environment.

**Previous NRC Commitments:**

**Site Compliance:** In accordance with EN-LI-110, the licensing management system used for tracking NRC commitments was searched for items relating to the key words: Area Radiation Monitor, Diesel Generator, Source Range Nuclear Instruments, Power Range Nuclear Instruments, RPIS - Control Rod Drive Rod Position, RPV Level, RPV Pressure, Torus , Containment Pressure, Containment Radiation , ODPS, ERDS with no relevant results related to equipment abandonment.

**Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change:**

**10 CFR 50.47(b)(8) - Emergency Facilities and Equipment**

- Adequate facilities are maintained to support emergency response.
- Adequate equipment is maintained to support emergency response

Sections IV.E.1–4, IV.E.8, and IV.G of Appendix E to 10 CFR 50 provide supporting requirements. Informing criteria appear in Section II.H of NUREG-0654; NUREG-0696, “Functional Criteria for Emergency Response Facilities,” and the licensee’s emergency plan.

**Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:**

AP-10049 serves to identify equipment that is important to emergency response at VY. Equipment identified in this procedure has been selected because of its role in emergency preparedness activities or its use in declaring an EAL. The procedure assists personnel in assessing the impact of out of service EP equipment. Attachment 1 of AP-10049 provides a plant specific listing of EP equipment and compensatory measures.

On January 12, 2015, Entergy certified to the NRC by letter (BVY 15-001) that a determination to permanently cease operations at Vermont Yankee (VY) was made on December 29, 2014, which was the date on which power operations ceased. Pursuant to 10 CFR 50.82(a)(1)(ii), Entergy also certified that the fuel has been permanently removed from the reactor vessel and placed in the SFP. Once VY docketed the certifications required by 10 CFR 50.82(a)(1), the 10 CFR Part 50 license no longer authorized operation of the reactor or placement or retention of fuel in the reactor vessel, in accordance with 10 CFR 50.82(a)(2).

Vermont Yankee will remove from service those systems and equipment that: support operation of the reactor; are not required to prevent or mitigate the consequences of a fuel handling accident in the SFP; are not required to support SFP cooling operations; and are not necessary to classify an EAL applicable in the defueled (DEF) mode. For those systems not required in a permanently shutdown and defueled condition, VY will initiate the abandonment process, but the abandonment process will not be completed, such that the function is capable of being restored until the function is no longer required (e.g. following NRC approval and subsequent implementation of VY’s Permanently Defueled Emergency Plan and EAL Scheme – Refer to BVY 14-033). Separate 50.54(q) evaluations will be completed to evaluate whether initiating the retirement of specific equipment or systems constitutes a reduction in the effectiveness of the Emergency Plan.

LBD CR# FCR 27/006 was developed to track the revision of Vermont Yankee UFSAR Section 14 (Station Safety Analysis) to remove information rendered obsolete by system abandonments resulting from the permanent cessation of power operations and permanent removal of fuel from the VY reactor vessel. The change removes the AOTs and DBA scenarios that will no longer be applicable in the permanently defueled

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condition. The change also revises the description of the remaining applicable DBA, the FHA over the SFP. The change to Section 14 of the UFSAR was approved on March 12, 2015. The new FHA based analysis shows that the dose consequences are acceptable without relying on any SSCs to remain functional during and following the event (following 13 days of irradiated fuel decay time after reactor shutdown and compliance with the SFP water level and temperature requirements of TS 3/4.12).

The Compensatory Measure for Fire Detection equipment incorrectly indicated no compensatory measures are required. Compensatory measures are required per AP0042 and the TRM. AP10049 was revised to correctly refer to AP0042 and the TRM for the required Compensatory Measures.

**Regulatory Guide 1.219**, "Guidance On Making Changes To Emergency Plans For Nuclear Power Reactors" provides guidance for determining reductions in effectiveness. Section 1.8 states:

*The 10 CFR 50.54(q) change process establishes a two-factor test to determine when a change to an emergency plan requires prior NRC approval. First, the test assesses whether the emergency plan, as modified, would continue to comply with the planning standards in 10 CFR 50.47(b) or the requirements in Appendix E to 10 CFR Part 50. Second, the test assesses whether the proposed change would reduce the effectiveness of the emergency plan. These two tests are separate and distinct. If the licensee does not meet either test, it must obtain prior NRC approval. Meeting the first test does not imply that the licensee has met the second test, nor does meeting the second test imply that the licensee has met the first test.*

**REGULATORY GUIDE 1.219 TEST PART 1: (Does the change comply with regulations?)**

10 CFR 50.47(b)(8) requires licensees to provide and maintain equipment necessary to support the emergency response. Section IV.E.2 requires licensees to maintain and describe equipment for determining the magnitude of and for continuously assessing the impact of a release of radioactive materials to the environment.

In order to protect the health and safety of the public, licensees are required to follow and maintain in effect, emergency plans that meet the standards of 10CFR 50.47(b) and Appendix E to 10 CFR Part 50. Equipment required to meet these regulations must be capable of functioning at all times, or if there is a loss of function, compensatory measures must be taken to restore the function until the equipment is repaired. A loss of emergency response function may occur from planned maintenance or unplanned equipment failures.

Based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) that operation of the reactor or emplacement or retention of fuel into the reactor vessel is prohibited, and provided that an acceptable evaluation, e.g., pursuant to 10 CFR 50.54(q)(3), has been performed, Vermont Yankee will remove from service those systems and equipment that: support operation of the reactor; are not required to prevent or mitigate the consequences of a fuel handling accident in the SFP; are not required to support SFP cooling operations; and are not necessary to classify an EAL applicable in the defueled (DEF) mode. Separate 50.54(q) evaluations will be completed to evaluate whether initiating the retirement of specific equipment or systems constitutes a reduction in the effectiveness of the Emergency Plan.

Equipment identified in AP-10049 that can be removed from service based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) will no longer require a compensatory measure and AP-10049 can be revised to indicate such without impacting compliance with Emergency Plan requirements or applicable regulations.

The proposed change does not impact compliance with Emergency Plan requirements or applicable regulations.

**REGULATORY GUIDE 1.219 TEST PART 2: (Is the change a reduction in effectiveness?)**

Once VY has docketed the certifications of permanent cessation of power operations and permanent removal of fuel from the reactor vessel in accordance with 10 CFR 50.82(a)(1), pursuant to 10 CFR 50.82(a)(2), the Part 50 license no longer authorizes operation of the VY reactor or emplacement or retention of fuel in the reactor vessel.

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Based on AP-10049, installed redundant equipment provides adequate Compensatory Measures in some cases. In other cases, the Technical Specifications (TS) or Technical Requirements Manual (TRM) provides adequate Compensatory Measures. In still other cases, no Compensatory Measures are required. Compensatory Measures are put in place prior to scheduled equipment outages and design modifications and immediately following equipment loss or facility functional failures, to prevent or mitigate any loss of function that could result from the removal of the equipment from service. Each Compensatory Measure is evaluated against the station emergency plan requirements. Compensatory Measures are incorporated into the emergency preparedness and work management processes. The work prioritization matrix appropriately addresses EP equipment and adjusts/raises priority when the Compensatory Measure put in place exceeds the time allowed in the evaluation or procedure, or when the Compensatory Measure itself fails.

Based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) that operation of the reactor or emplacement or retention of fuel into the reactor vessel is prohibited, and provided that an acceptable evaluation, e.g., pursuant to 10 CFR 50.54(q)(3), has been performed, Vermont Yankee will remove from service those systems and equipment that: support operation of the reactor; are not required to prevent or mitigate the consequences of a fuel handling accident in the SFP; are not required to support SFP cooling operations; and are not necessary to classify an EAL applicable in the defueled (DEF) mode. Separate 50.54(q) evaluations will be completed to evaluate whether initiating the retirement of specific equipment or systems constitutes a reduction in the effectiveness of the Emergency Plan.

Revising AP-10049 as proposed to address changes made to plant equipment resulting from VY's permanently shutdown and defueled condition will have no impact on the adequacy of facilities or equipment necessary to support the emergency response in the permanently shutdown and defueled condition. The procedure, as revised, identifies equipment no longer used in the permanently defueled condition and identifies EALs that can no longer be declared based on Mode Applicability. Based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) that operation of the reactor or emplacement or retention of fuel into the reactor vessel is prohibited, the reactor cannot be in a mode other than DEF and Compensatory Measures associated with the equipment no longer used is no longer necessary.

Equipment identified in AP-10049 that can be removed from service based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) will no longer require a Compensatory Measure and AP-10049 can be revised to indicate such without impacting compliance with Emergency Plan requirements or applicable regulations.

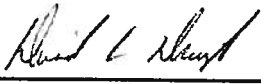

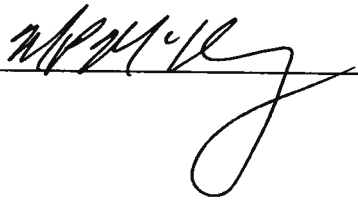
The proposed changes to AP-10049 continue to comply with the requirements of 10 CFR 50.47(b)(8). This change continues to align with the requirements of Appendix E to 10 CFR Part 50. This revision does not require a change to the Emergency Plan and does not represent a reduction in effectiveness of the Emergency Plan and can be implemented without NRC approval.

**Part VI. Evaluation Conclusion**  
**Answer the following questions about the proposed change.**

1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. Does the proposed change constitute an emergency action level scheme change?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If questions 1 or 2 are answered NO, or question 3 answered YES, reject the proposed change, modify the proposed change and perform a new evaluation or obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es). Refer to step 5.6[8].

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Part VII. Signatures		
Preparer Name (Print) David L Daigle	Preparer Signature 	Date: 04/06/2015
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Tom Sowdon Nuclear EP Project Manager	Reviewer Signature 	Date: 4-6-2015
Approver Name (Print) MP McKenney EP Manager or designee	Approver Signature 	Date: 4/6/15



Attachment 1

AP-10049 Section	Before (Rev. 3)	After (Rev. 4)	Reason for Change
2.0 Discussion	--	<p>Added: Based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(a)(2) that operation of the reactor or emplacement or retention of fuel into the reactor vessel is prohibited, and provided that an acceptable evaluation, e.g., pursuant to 10 CFR 50.54(g)(3), has been performed, Vermont Yankee will remove from service those systems and equipment that support operation of the reactor; are not required to prevent or mitigate the consequences of a fuel handling accident in the spent fuel pool (SFP); are not required to support SFP cooling operations; and are not necessary to classify an EAL applicable in the defueled (DEF) mode. Equipment which has been removed from service or is planned to be removed from service during the decommissioning process is noted as such in Attachment 1. Those EALs which are not possible in the DEF mode are noted as such in Attachment 1.</p>	<p>Editorial revision to reflect certification of permanent cessation of operations and permanent removal of fuel from the reactor vessel and to describe removal from service those systems and equipment no longer used.</p>
4.1 Performance References	4.1.1 EN-EP-202	4.1.1 V-EN-EP-202	Editorial – Procedure number updated
4.1 Performance References	4.1.2 EN-PL-191	Deleted	Editorial – Procedure cancelled and replaced with EN-EP-202.
7.4.3	“(This is due primarily to NRC SDP finding significance evaluation criteria)”	Deleted	Editorial - SDP doesn't apply in permanently shutdown condition.
7.10	EN-WM-100	MTAP-10084	Editorial – EN-WM-100 combined into site procedure MTAP-10084.

Attachment 1

AP-10049 Section	Before (Rev. 3)	After (Rev. 4)	Reason for Change
8.1	<p>The Manager, Corrective Action is responsible for ensuring that the corrective action program supports tracking and trending of deficiencies related to EP equipment.</p>	<p>The Manager, Licensing and Corrective Action is responsible for ensuring that the corrective action program supports tracking and trending of deficiencies related to EP equipment and for providing guidance on compliance with the station licensing basis and related reportability issues.</p>	<p>Editorial – Revised title for consistency with SAFSTOR Organization and combined responsibilities with section 8.6. Paragraph 8.6 deleted.</p>
8.7	<p>Manager, Planning Scheduling and Outages</p>	<p>Manager, Production/Maintenance</p>	<p>Editorial – Revised title for consistency with SAFSTOR Organization and renumbered as section 8.6.</p>
8.8	<p>Operations Manager/Shift Manager or Manager, Planning, Scheduling and Outage</p>	<p>Operations Senior Manager/Shift Manager or Manager, Production/Maintenance</p>	<p>Editorial – Revised title for consistency with SAFSTOR Organization and renumbered as section 8.7.</p>
9.4	<p>--</p>	<p>New Section: 9.4 Removing EP Equipment from Service to Support the Decommissioning Process</p>	<p>Added paragraph to describe Compensatory Actions for Category "A" and "B" equipment not necessary to declare any EAL possible in the permanently shutdown and defueled condition.</p>
Attachment 1	<p>OP-2611</p>	<p>CHOP-STAK-2611</p>	<p>Editorial – Procedure number updated</p>
Attachment 1	<p>OP-3513</p>	<p>EPOP-RAD-3513</p>	<p>Editorial – Procedure number updated – Change made throughout Attachment 1</p>
Attachment 1 Area Radiation Monitors	<p>--</p>	<p>Separated ARM #13 and ARM #20 through 26 from other ARMs; revised Compensatory Action to indicate none required when in the DEF mode; and added note (*) stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the</p>	<p>Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.</p>

**Attachment 1**

<b>AP-10049 Section</b>	<b>Before (Rev. 3)</b>	<b>After (Rev. 4)</b>	<b>Reason for Change</b>
Attachment 1 Fire Detection Equipment	No Compensatory Measures are required.	permanently shutdown and defueled condition (Mode DEF).	To correctly refer to required Compensatory Measures.
Attachment 1 Diesel Generator	--	Revised Compensatory Action to indicate none required when in the DEF mode; and added note (*) stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF).	Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.
Attachment 1 DC Buses	--	Added note (*) stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF).	Equipment will be removed from service.
Attachment 1 Period Meters 7-44A, B, C, D	--	Revised Compensatory Action to indicate none required when in the DEF mode; and added note (*) stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF).	Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.
Attachment 1 APRMs	--	Revised Compensatory Action to indicate none required when in the DEF mode; and added note (*) stating that equipment has been, or will be, removed from service to support decommissioning activities.	Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.

Attachment 1

AP-10049 Section	Before (Rev. 3)	After (Rev. 4)	Reason for Change
Attachment 1 RPIS (Full Core Display)	--	<p>Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF).</p> <p>Revised Compensatory Action to indicate none required and added note stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF). Revised Comment box to indicate equipment is not used in the permanently defueled condition.</p>	<p>Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.</p>
Attachment 1 RPV Level	--	<p>Revised Compensatory Action to indicate none required when in the DEF mode and added note stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF). Revised Comment box to indicate equipment is not used in the permanently defueled condition.</p>	<p>Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.</p>
RPV Pressure	--	<p>Revised Compensatory Action to indicate none required when in the DEF mode and added note stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF). Revised Comment box to indicate equipment is not used in the permanently defueled condition.</p>	<p>Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.</p>

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AP-10049 Section	Before (Rev. 3)	After (Rev. 4)	Reason for Change
Attachment 1 Torus Temperature	--	<p>Comment box to indicate equipment is not used in the permanently defueled condition.</p> <p>Revised Compensatory Action to indicate none required when in the DEF mode and added note stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF). Revised Comment box to indicate equipment is not used in the permanently defueled condition.</p>	<p>Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.</p>
Attachment 1 Containment Pressure	--	<p>Revised Compensatory Action to indicate none required and added note stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF). Revised Comment box to indicate equipment is not used in the permanently defueled condition.</p>	<p>Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.</p>
Attachment 1 Containment Radiation	--	<p>Revised Compensatory Action to indicate none required and added note stating that equipment has been, or will be, removed from service to support decommissioning activities. Equipment is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF). Revised Comment box to indicate equipment is not used in</p>	<p>Equipment will be removed from service and no Compensatory Measures are required when in the DEF mode.</p>

Attachment 1

AP-10049 Section	Before (Rev. 3)	After (Rev. 4)	Reason for Change
Attachment 1 Classifications Table	--	the permanently defueled condition. Added Note (*) to end of table to identify that equipment that has been, or will be, removed from service to support the decommissioning activities and is not necessary to declare any EAL possible in the permanently shutdown and defueled condition (Mode DEF).	
Attachment 1	OP-3547	EPOP-SEC-3547	Editorial – Procedure number updated throughout Attachment 1
Attachment 1 ODPS	--	Deleted ODPS entry	Replaced with URI (Refer to previous 50.54(q) evaluation)
Attachment 1 METPAC	--	Deleted METPAC entry	Replaced with URI (Refer to previous 50.54(q) evaluation)
Attachment 1 URI	--	Added UR entry	Replaced ODPS/METPAC (Refer to previous 50.54(q) evaluation)
Attachment 1	OP-3510	OP-OSMT-3510	Editorial – Procedure number updated throughout Attachment 1
Attachment 1 ERDS	--	Deleted ERDS entry	ERDS not used in permanently shutdown and defueled condition (Refer to previous 50.54(q) evaluation)
Attachment 1	OP-3507	EPOP-EREC-3507	Editorial – Procedure number updated throughout Attachment 1
Attachment 1	--	Added Note (**) to EALs that cannot be declared in Mode DEF and following each table stating that based on Mode Applicability, this EAL cannot be declared in the DEF mode. Based on being in a permanently defueled condition and the restriction imposed by 10 CFR 50.82(e)(2), operation of the reactor	EALs identified with the new Note “**” in Attachment 1 of AP-10049 cannot be declared in the DEF mode.  This note is applicable to the following EALs identified in Attachment 1 of AP-10049: SG1.1

**Attachment 1**

AP-10049 Section	Before (Rev. 3)	After (Rev. 4)	Reason for Change
		or emplacement or retention of fuel into the reactor vessel is prohibited.	SS1.1 SA1.1 SU1.1 CU1.1 SS7.1 CU6.1 SU2.1 CU5.1 CG2.2 CS2.3 SG2.1 SS2.1 SA2.1 FG1.1 FS1.1 FA1.1 CG2.1 CS2.1 CA2.1 CU2.1 CS2.2 CU2.2 CU2.3 CU3.2 FU1.1 CA3.1 FA1.1 SS4.1 SA4.1 SU4.1 SU4.2