ATTACHMENT 9.1
SHEET 1 OF 3

Procedure/Document Number: EPOP-EOF-3546 Revision: 04
Equipment/Facility/Other: Vermont Yankee
Title: Emergency Operations Facility/Recovery Center (EOF/RC)

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):

Updated procedure numbers throughout to match the SAFSTOR organization

Attachment 22 – EOF/RC Briefing Guide
  • Updated based on feedback from Emergency Directors

Attachment 25 – Plant Status Briefing Form
  • Removed items related to the Reactor and replaced them with the fuel pool

Attachment 28 – EOF/RC Footprint Sample
  • Updated the sample image to match the SAFSTOR ERO positions

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)

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
10CFR50.54(q)

Part IV. Editorial Change
Is this activity an editorial or typographical change such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?

Justification:

☐ YES 50.54(q)(3) Evaluation is NOT required. Enter justification and complete Part VI.
☒ NO Continue to next part

Part V. Emergency Planning Element/Function Screen (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]

EN-EP-305 REV 3
<table>
<thead>
<tr>
<th>Procedure/Document Number: EPOP-EOF-3546</th>
<th>Revision: 04</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment/Facility/Other: Vermont Yankee</td>
<td></td>
</tr>
<tr>
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<td></td>
</tr>
</tbody>
</table>

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]

3. The process ensures that on shift emergency response responsibilities are staffed and assigned. [2]

4. The process for timely augmentation of onshift staff is established and maintained. [2]

5. Arrangements for requesting and using off site assistance have been made. [3]

6. State and local staff can be accommodated at the EOF in accordance with the emergency plan. [3]

7. A standard scheme of emergency classification and action levels is in use. [4]

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]

9. Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. [5]

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]

11. Systems are established for prompt communication among principal emergency response organizations. [6]

12. Systems are established for prompt communication to emergency response personnel. [6]

13. Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ). [7]

14. Coordinated dissemination of public information during emergencies is established. [7]

15. Adequate facilities are maintained to support emergency response. [8]

16. Adequate equipment is maintained to support emergency response. [8]

17. Methods, systems, and equipment for assessment of radioactive releases are in use. [9]

18. A range of public PARs is available for implementation during emergencies. [10]

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]

20. A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events. [10]

21. The resources for controlling radiological exposures for emergency workers are established. [11]

22. Arrangements are made for medical services for contaminated, injured individuals. [12]

23. Plans for recovery and reentry are developed. [13]

24. A drill and exercise program (including radiological, medical, health physics and other program areas) is established. [14]

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]

26. Identified weaknesses are corrected. [14]

27. Training is provided to emergency responders. [15]
28. Responsibility for emergency plan development and review is established. [16]  

29. Planners responsible for emergency plan development and maintenance are properly trained. [16]  

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 entire procedure has been updated to reflect the procedure numbering scheme for the SAFSTOR organization. This change does not alter the meaning or intent of this procedure, affect any facilities or equipment, or any other processes described in this procedure. No further action is required. 

Attachment 22 – EOF/RC Briefing Guide  
• This attachment has been revised based on feedback from the Emergency Directors to enhance the flow of facility briefings. Rewording and rearranging the content of this briefing guide does not affect any of the responsibilities or tasks associated with the Emergency Director position. This item is a procedure enhancement that does not alter the meaning or intent of this procedure, affect any facilities or equipment, or any other processes described in this procedure. No further action is required. 

Attachment 25 – Plant Status Briefing Form  
• Removed items related to the Reactor and replaced them with the fuel pool. The changes to this attachment have been processed to reflect the permanently shutdown status of Vermont Yankee. Since there is no longer any fuel in the reactor, the main concern is the spent fuel pool, water level, and temperature which are now reflected on the plant status briefing form. The changes to this form do not alter the meaning or intent of this procedure, affect any facilities or equipment, or any other processes described in this procedure. No further action is required. 

Attachment 28 – EOF/RC Footprint Sample  
• The sample image for the EOF/RC has been updated to match the SAFSTOR ERO positions. This footprint represents a sample of the facility layout and the changes are administrative in nature. Updates to this attachment do not alter the meaning or intent of this procedure, affect any facilities or equipment, or any other processes described in this procedure. No further action is required. 

None of the 10CFR50.47(b) planning standard elements in Part V of this form are affected by the changes in Part I. This procedure revision does not require a change to the Emergency Plan or represent a reduction in effectiveness to the Emergency Plan and can be incorporated without prior NRC approval. No further evaluation is required. 

Part VI. Signatures:  
| Preparer Name (Print) | Preparer Signature | Date:  
|-----------------------|--------------------|-------  
| Justine Anderson | [Signature] | 3/25/15  

| (Optional) Reviewer Name (Print) | Reviewer Signature | Date:  
|----------------------------------|-------------------|-------  
| Tom Sowdon | [Signature] | 3-25-2015  

| Reviewer Name (Print) | Reviewer Signature | Date:  
|-----------------------|-------------------|-------  
| Nuclear EP Project Manager | [Signature] |  

| Approver Name (Print) | Approver Signature | Date:  
|-----------------------|-------------------|-------  
| MP McKenney | [Signature] | 3/31/15  

| EP manager or designee | [Signature] |  

EN-EP-305 REV 3