

<b>Procedure/Document Number: EPOP-PAR-3511</b>	<b>Revision: 02</b>
<b>Equipment/Facility/Other: Vermont Yankee</b>	
<b>Title: Off-Site Protective Action Recommendations</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):

Procedure numbers corrected to match SAFSTOR throughout

**Precautions**

- Bullet 6.5 reworded to clarify protective action recommendation (PAR) requirements for Category A classifications
- Bullet 6.6 enhanced to add a reference to Category H

**Section 9.2 Protective Action Recommendation Based on Radiological Dose Information**

- Deleted reference to EPOP-RAD-3513, Attachment 11
- 9.2.5.D.1 – Corrected attachment reference from 1 to 19
- 9.2.5.D.2.a – Added a statement for adding additional towns to the PAR
- 9.2.5.D.3.a – Added a statement for adding additional towns to the PAR

**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"/> <b>YES</b> 50.54(q)(3) Evaluation is NOT required. Enter justification below and complete Part VI.	<input checked="" type="checkbox"/> <b>NO</b> 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**

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:**

<input type="checkbox"/> <b>YES</b> 50.54(q)(3) Evaluation is NOT required. Enter justification and complete Part VI.	<input checked="" type="checkbox"/> <b>NO</b> Continue to next part
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**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?

<b>Procedure/Document Number: EPOP-PAR-3511</b>	<b>Revision: 02</b>
<b>Equipment/Facility/Other: Vermont Yankee</b>	
<b>Title: Off-Site Protective Action Recommendations</b>	

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 type="checkbox"/>
17. Methods, systems, and equipment for assessment of radioactive releases are in use. [9]	<input checked="" type="checkbox"/>
18. A range of public PARs is available for implementation during emergencies. [10]	<input checked="" 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"/>
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"/>

Procedure/Document Number: EPOP-PAR-3511	Revision: 02
Equipment/Facility/Other: Vermont Yankee	
Title: Off-Site Protective Action Recommendations	

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**

Procedure references were updated throughout to align with the SAFSTOR organization. This change is administrative in nature and 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.

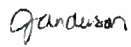

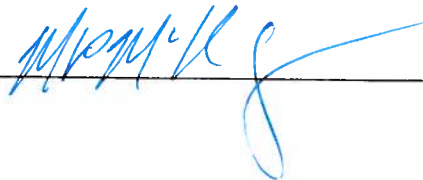
Bullets 6.5 and 6.6 in the precaution section have been revised to clarify intent and add the Category designators from the Emergency Action Level (EAL) chart. This change is administrative in nature and does not alter the meaning or intent of this procedure, affect any facilities or equipment, or any other processes described in this procedure. No further action is required.

Section 9.2 Protective Action Recommendation Based on Radiological Dose Information

- The reference to EPOP-RAD-3513, Attachment 11 has been removed from section 9.2 because Attachment 11 no longer exists in EPOP-RAD-3513. This change is administrative in nature and 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.
- 9.2.5.D.1 – Corrected attachment reference from 1 to 19. This change is administrative in nature and 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.

Emergency Planning Standard 10CFR50.47(b)(9) & (10) and planning standard elements 17 & 18 in Part V of this form are affected by the remaining changes in Part I. A 10CFR50.54(q) Evaluation will be performed to determine whether the effectiveness of the Emergency Plan is reduced and prior NRC approval is required.

**Part VI. Signatures:**

Preparer Name (Print) Justine Anderson	Preparer Signature 	Date: 3/26/15
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Tom Sowdon Nuclear EP Project Manager	Reviewer Signature 	Date: 3-30-2015
Approver Name (Print) MP McKenney EP manager or designee	Approver Signature 	Date: 3/31/15

Procedure/Document Number: EPOP-PAR-3511

Revision: 02

Equipment/Facility/Other: Vermont Yankee

Title: Off-Site Protective Action Recommendations

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

Section 9.2 Protective Action Recommendation Based on Radiological Dose Information

- 9.2.5.D.2.a – Added a statement for adding additional towns to the PAR
- 9.2.5.D.3.a – Added a statement for adding additional towns to the PAR

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

A process applicability determination (PAD) exclusion has been performed for EPOP-PAR-3511 in accordance with EN-LI-100, "Process Applicability Determination". The Emergency Plan and the UFSAR were searched for the keywords Unified Rascal, and Protective Action Recommendation. None of the other licensing based documents on the PAD form were affected by this procedure change.

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

Previous NRC Commitments: Per EN-LI-110 the licensing management system used for tracking NRC commitments has been searched for items relating to the keywords: Unified Rascal, and Protective Action Recommendation with no relevant results.

- 10CFR50.47(b)(9) – Emergency Assessment Capability: Methods, systems, and equipment for assessment of radioactive releases are in use.  
Site Compliance: Unified Rascal Interface (URI) is the primary dose assessment program for Vermont Yankee.
- 10CFR50.47(b)(10) – Emergency Protective Actions: A range of public PARs is available for implementation during emergencies.  
Site Compliance: This procedure is used to determine the appropriate protective action recommendations (PARs) during a General Emergency (GE). PARs are developed in the Control Room or the Emergency Operations Facility (EOF) and must be approved by the Shift Manager or Emergency Director before they are communicated to state officials.

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

10CFR50.47(b)(9) – Emergency Assessment Capability:

- Methods, systems, and equipment for assessment of radioactive releases are in use.

Sections IV.B and IV.E.2 of Appendix E to 10 CFR 50 provide supporting requirements. Informing criteria appear in Section II.I of NUREG-0654 and the licensee's emergency plan.

10CFR50.47(b)(10) – Emergency Protective Actions:

- A range of public PARs is available for implementation during emergencies.

Appendix E to 10 CFR 50 does not provide supporting requirements. Informing criteria appear in NUREG-0654 in Section II.J.1-8, Section II.J.10 and Supplement 3 and the licensee's emergency plan.

Procedure/Document Number: EPOP-PAR-3511

Revision: 02

Equipment/Facility/Other: Vermont Yankee

Title: Off-Site Protective Action Recommendations

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

Section 9.2 Protective Action Recommendation Based on Radiological Dose Information

- 9.2.5.D.2.a – Added a statement for adding additional towns to the PAR
- 9.2.5.D.3.a – Added a statement for adding additional towns to the PAR

The changes listed above have been made to ensure that towns identified by the Unified RASCAL Interface (URI) dose assessment software that are not found in Attachments 2 and 3 of Procedure EPOP-PAR-3511 are included in the Protective Action Recommendation (PAR) that is sent to the states. METPAC, the previous dose assessment software program, was not capable of identifying the affected downwind towns so Attachments 2 and 3 of Procedure EPOP-PAR-3511 were developed. URI uses a more sophisticated dispersion model than METPAC and only identifies towns where the Environmental Protection Agency (EPA) Protective Action Guides (PAGs) have been exceeded. It is necessary to use both Procedure EPOP-PAR-3511 and URI to ensure that compliance with EPA 400-R-92-001 and the Vermont Yankee Emergency Plan is maintained.

This change will continue to comply with the requirements of 10CFR50.47(b)(9) and (10) because methods, systems and equipment continue to be in place for the assessment of radioactive releases, and a range of emergency protective actions remains in place and has not changed. This change does not represent a reduction in effectiveness of the Emergency Plan because the planning standards and program elements continue to be satisfied. This change can be implemented without prior approval from the NRC.

Procedure/Document Number: EPOP-PAR-3511	Revision: 02
Equipment/Facility/Other: Vermont Yankee	
Title: Off-Site Protective Action Recommendations	

**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].

**Part VII. Signatures**

Preparer Name (Print) Justine Anderson	Preparer Signature <i>J Anderson</i>	Date: 12/17/14
(Optional) Reviewer Name (Print) Chuck Dissinger	Reviewer Signature <i>C.H. Dissinger Jr.</i>	Date: 12/17/2014
Reviewer Name (Print) Tom Sowdon Nuclear EP Project Manager	Reviewer Signature <i>Thomas L Sowdon</i>	Date: 3-30-2015
Approver Name (Print) MP McKenney EP Manager or designee	Approver Signature <i>MP McKenney</i>	Date: 3/31/15