

Procedure/Document Number: V-EN-EP-801	Revision: 11
Equipment/Facility/Other: Vermont Yankee	
Title: Emergency Response Organization	

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):

Throughout

- Procedure numbers updated to match the Vermont Yankee transition from fleet to SAFSTOR procedures
- Deleted references to EN-OP-115

References

- Revised policies from company policies to Vermont Yankee policies
- Added NVE 15-015

Attachment 9.2. On-Shift ERO Responsibilities

- Added note regarding the 50.54(x) exemption issued by the NRC
- Removed reference to Attachment 1

Attachment 9.3. TSC ERO Responsibilities

- Emergency Plant Manager Section
 - Deleted reference to the Severe Accident Management Guidelines
 - Added note regarding the 50.54(x) exemption issued by the NRC
- Operations Coordinator
 - Deleted reference to the Severe Accident Management Guidelines
 - Replaced "severe core damage" with "damage to the fuel in the spent fuel pool"
 - Added note regarding the 50.54(x) exemption issued by the NRC
- Maintenance Coordinator
 - Deleted bullet 2 that contained no information
- Engineering Coordinator
 - Replaced "severe core damage" with "damage to the fuel in the spent fuel pool"

Attachment 9.4. OSC ERO Responsibilities

- OSC Manager
 - Removed reference to the OSC Log Keeper

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<p>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?</p> <p>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:</p> <p>Justification:</p> <p><input type="checkbox"/> Bounding document attached (optional)</p>	<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
10CFR50.54(q)

<p>Part IV. Editorial Change Is this activity an editorial or typographical change such as format, paragraph numbering, spelling, or punctuation that does not change intent?</p> <p>Justification:</p>	<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
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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?

1. Responsibility for emergency response is assigned. [1]	<input checked="" 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 checked="" 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-	<input type="checkbox"/>

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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]	<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 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"/>
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.

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BASIS FOR CONCLUSION

Throughout

- Procedure numbers throughout this procedure have been updated to match the Vermont Yankee numbering scheme. Fleet procedures were transferred to Vermont Yankee procedures on 1/19/15 and they have been designated with a "V-" before the previous numbering scheme. All references contained within this procedure have been updated to reflect the changes. This update to the numbering of procedures 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.
- All references to EN-OP-115, Conduct of Operations that were referenced in this procedure have been removed because Operations cancelled this procedure on 1/19/15. The removal of EN-OP-115 references within this procedure does not affect any of the assignments or responsibilities of the Emergency Response Organization (ERO) as described in the Attachments. The removal of EN-OP-115 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.

References

- Policy references within this procedure have been updated from the Entergy corporate policy numbers to the Vermont Yankee policies that became effective on 1/19/15. All policies are contained in Merlin and can be found by searching the fleet or VY policy number. The updated references are administrative in nature and 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.
- NVCY 15-015 has been added as a reference in section 2.0. The US Nuclear Regulatory Commission (NRC) issued an exemption in NVCY 15-015 to remove the requirement that a licensed senior operator approve the emergency suspension of security measures and for Vermont Yankee Nuclear Power Station (VY) during certain emergency conditions or during severe weather. As a result of this exemption, all suspensions must be approved by a Certified Fuel Handler. Sections within this procedure have been updated to include this information in a note. The addition of a reference document to this procedure 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 9.2, On-Shift ERO Responsibilities

- The description for the On-Shift CR Communicator and the On-Shift Dose Assessor contained a reference to Attachment 1, however there is no Attachment 1 in this procedure. This reference has been removed to eliminate confusion and the description states that the site will designate which on shift position(s) performs this function for both positions. No changes were made to the on shift responsibilities of the Communicator or Dose Assessor and actions will continue to be performed in accordance with the Emergency Plan. The elimination of the reference to Attachment 1 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.

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Attachment 9.3. TSC ERO Responsibilities

- Maintenance Coordinator
 - Bullet 2 under the Maintenance Coordinator contained no wording or responsibilities associated with this position. The removal of this typo is editorial 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.

Attachment 9.4. OSC ERO Responsibilities

- OSC Manager
 - The reference to the OSC Log Keeper has been removed from this section because the Log Keeper position was eliminated on 2/5/15 when the Vermont Yankee SAFSTOR Emergency Response Organization became effective. The OSC Manager will continue to maintain communications with the Control Room and Technical Support Center to track OSC teams and activities using the WebEOC log and status board screens. The elimination of the reference to the OSC Log Keeper 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)(1) & (2) and planning standard elements 1 & 3 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 <i>J Anderson</i>	Date: 3/18/15
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
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

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Part I. Description of Proposed Change:

Attachment 9.2, On-Shift ERO Responsibilities

- Added note regarding the 50.54(x) exemption issued by the NRC

Attachment 9.3, TSC ERO Responsibilities

- Emergency Plant Manager Section
 - Deleted reference to the Severe Accident Management Guidelines
 - Added note regarding the 50.54(x) exemption issued by the NRC
- Operations Coordinator
 - Deleted reference to the Severe Accident Management Guidelines
 - Replaced "severe core damage" with "damage to the fuel in the spent fuel pool"
 - Added note regarding the 50.54(x) exemption issued by the NRC
- Engineering Coordinator
 - Replaced "severe core damage" with "damage to the fuel in the spent fuel pool"

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

A process applicability determination (PAD) exclusion has been performed for V-EN-EP-801 in accordance with EN-LI-100, Process Applicability Determination. The Emergency Plan and the UFSAR were searched for the keywords: 50.54(x), Emergency Plant Manager, Operations Coordinator, & Engineering Coordinator.

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: 50.54(x), Emergency Plant Manager, Operations Coordinator, & Engineering Coordinator with no relevant results.

- 10CFR50.47(b)(1) – Assignment of Responsibility/Organizational control: Responsibility for emergency response is assigned.
Site Compliance: The responsibilities for emergency response are described in Attachments 9.1-9.6 of this procedure and in the implementing procedures for the Control Room, Technical Support Center, Operations Support Center, Joint Information Center, Emergency Operations Facility and Incident Command Post.
- 10CFR50.47(b)(2) – Onsite Emergency Organization: The process ensures that onshift emergency response responsibilities are staffed and assigned.
Site Compliance: The responsibilities for the onshift emergency response personnel are described in Attachment 9.2 of this procedure and in the Emergency Plan.

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

10CFR50.47(b)(1) – Assignment of Responsibility/Organizational control

- Responsibility for emergency response is assigned.

Sections IV.A.1-9 of Appendix E to 10 CFR 50 provide supporting requirements. Informing criteria appear in Section II.A of NUREG-0654 and the licensee's emergency plan.

10CFR50.47(b)(2) – Onsite Emergency Organization:

- The process ensures that onshift emergency response responsibilities are staffed and assigned.

Sections IV.A.2.a-c, IV.A.3, and IV.C of Appendix E to 10 CFR 50 provide supporting requirements. Informing criteria appear in Section II.B of NUREG-0654 and the licensee's emergency plan.

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

Attachment 9.2, On-Shift ERO Responsibilities

- A note has been added to Attachment 9.2 regarding NVY 15-015. The US Nuclear Regulatory Commission (NRC) issued an exemption in NVY 15-015 to remove the requirement that a licensed senior operator approve the emergency suspension of security measures and for Vermont Yankee Nuclear Power Station (VY) during certain emergency conditions or during severe weather under 10CFR50.54(x). As a result of this exemption, all suspensions must be approved by a Certified Fuel Handler. The responsibility descriptions for the Emergency Plant Manager and the Operations Coordinator discuss invoking the provisions of 10CFR50.54(x) and the note has been added to each of those attachments for reference to ensure the appropriate approver is used. The addition of this note for clarification on the requirements for Vermont Yankee in SAFSTOR continues to comply with the requirements of 10CFR50.47(b)(1) & (2) because the assignment of responsibilities remains unchanged and no changes have been made to the onshift emergency response responsibilities or staffing.

Attachment 9.3, TSC ERO Responsibilities

- Emergency Plant Manager Section
 - The responsibility for the Emergency Plant Manager and the Operations Coordinator to implement the Severe Accident Management (SAM) Guidelines has been removed from this procedure because the SAM guidelines describe the actions taken when the core integrity is threatened. Since there is no longer a core at Vermont Yankee, Operations has cancelled the SAM guidelines. The removal of this responsibility to implement the SAM guidelines continues to comply with the requirements of 10CFR50.47(b)(1) because responsibility for emergency response continues to be assigned for SAFSTOR operation.
 - Added note regarding the 50.54(x) exemption issued by the NRC. See Attachment 9.2 justification above.
- Operations Coordinator
 - Deleted reference to the Severe Accident Management Guidelines. See Attachment 9.3 justification above.
 - Responsibility number 16 for the Operations Coordinator and number 2 for the Engineering Coordinator have been revised to change "severe core damage" to "damage to the fuel in the spent fuel pool". This change is being processed to reflect the permanently shutdown and defueled condition of Vermont Yankee. Since it is no longer possible to achieve severe core damage, the focus of the Operations and Engineering Coordinators will be to recommend strategies and actions to prevent damage to the fuel in the spent fuel pool and reduce radiological releases. The removal of this responsibility to recommend strategies to prevent core damage continues to comply with the requirements of 10CFR50.47(b)(1) because responsibility for emergency response continues to be assigned for SAFSTOR operation and the protection of the fuel pool.
 - Added note regarding the 50.54(x) exemption issued by the NRC. See Attachment 9.2 justification above.
- Engineering Coordinator
 - Replaced "severe core damage" with "damage to the fuel in the spent fuel pool"

The proposed changes to V-EN-EP-801 continue to comply with the requirements of 10 CFR 50.47(b)(1) & (2). The changes in this procedure do not require a change to the Emergency Plan or represent a reduction in effectiveness and can be implemented without prior NRC approval.

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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: 3/18/15
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
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

