



FEMA

August 19, 2014

Mr. Joseph Anderson
Operating Reactors Licensing Outreach Branch
Division of Preparedness and Response
Office of the Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Ref: Vermont Yankee Pre-Exemption Emergency Plan - Request from Entergy Nuclear Operations, Inc. For Approval to Eliminate Certain Emergency Response Organization Positions

Dear Mr. Anderson:

The FEMA Radiological Emergency Preparedness (REP) program received a request from the Nuclear Regulatory Commission (NRC) to review and concur with a license amendment request that proposed changes to the Vermont Yankee Emergency Response Organization.

Entergy Nuclear Operations, Inc. (ENO), licensee for the Vermont Yankee Nuclear Power Station, submitted a request to the NRC for a license amendment to reduce the number of personnel in its Emergency Response Organization (ERO). Per the Memorandum of Understanding between FEMA and the NRC, contained in 44 CFR § 353, Appendix A, the NRC requested FEMA's review and concurrence of the proposed changes.

A review of the license amendment noted that the changes were coordinated with, and approved by the States of Massachusetts, New Hampshire and Vermont. FEMA Region I reviewed these changes for impact to the State and local organizations and determined the amendment would not significantly affect the state plans based on information from the affected states. FEMA Headquarters agrees with Region I's determination that these changes were not significant pursuant to 44 CFR § 350.14(b), thus not requiring a review by FEMA of the affected state and local plans.

ENO will conduct drills in the 4th quarter of 2014 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.

If you have any questions, please contact myself at 202-646-2849 or Albert Coons at 202-212-2318.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vanessa E. Quinn".

Vanessa E. Quinn
Chief
Radiological Emergency Preparedness Branch

cc: S. Colman, FEMA Region I



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 6, 2014

Vanessa Quinn, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
Federal Emergency Management Agency
1800 South Bell Street
Arlington, VA 20598-3025

SUBJECT: VERMONT YANKEE PRE-EXEMPTION EMERGENCY PLAN – REQUEST FROM
ENTERGY NUCLEAR OPERATIONS, INC. FOR APPROVAL TO ELIMINATE
CERTAIN EMERGENCY RESPONSE ORGANIZATION POSITIONS

Dear Ms. Quinn:

By letter dated March 24, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14085A257), Entergy Nuclear Operations, Inc. (ENO) requested a license amendment to the Site Emergency Plan (SEP) for the Vermont Yankee Nuclear Power Station (VY), to be implemented upon the permanent cessation of reactor operation and transfer of spent fuel out of the reactor vessel. The proposed changes to the licensee's on-shift and emergency response organization (ERO) staffing are based on the permanent defueled condition of the site and are commensurate with the reduced spectrum of credible accidents. However, since these proposed changes would be implemented prior to the U.S. Nuclear Regulatory Commission (NRC) granting any exemption to the requirements of Part 50 to Title 10 of the *Code of Federal Regulations* (10 CFR), formal offsite radiological emergency preparedness (REP) plans, as required under 44 CFR 350, would still be required at the time the proposed license amendment is implemented by the licensee. As such, the Federal Emergency Management Agency (FEMA) is requested to review the specific changes outlined below to the licensee's ERO and provide the NRC an evaluation of whether these changes would preclude offsite agencies from implementing their approved emergency plans.

ENO's proposed changes, including those related to ERO staffing of the licensee's emergency operations facility (EOF) and joint information center (JIC) are addressed in Attachment 1 to ENO's March 24, 2014 letter, Section 5.2, "Analysis of Proposed Changes – ERO Staffing," which states:

There are two positions being eliminated that had tasks that involved interfacing with State and local officials the EOF Manager and the JIC Logistics Coordinator. The EOF Manager briefed these officials when they arrived at the EOF. This is a duplicate effort with the Lead Offsite Liaison (which is not being eliminated). Therefore, there will be no impact on the existing interface with the elimination of the EOF Manager. The JIC Logistics Coordinator was responsible for copying and distribution of press releases in the JIC to State and local officials. This task is going to be assumed by the JIC Manager. Therefore, the elimination of the JIC Logistics Coordinator will not impact the ability to maintain the interface with State and local officials.

Our initial review of the ENO submittal for requesting EOF staff reductions indicated that none of the following key positions supporting offsite response organizations (OROs) are to be eliminated: emergency director, technical advisor, radiological assessment coordinator (to include a dose assessor and offsite monitoring teams), lead offsite liaison, offsite liaisons, and offsite communicator. The briefing of ORO officials arriving at the EOF will be the responsibility of the lead offsite liaison (as noted above), which was previously a duplicate task assigned to the EOF manager.

In regard to the JIC, the following remaining positions: company spokesperson, JIC manager, and technical advisor (along with an inquiry responder), should provide adequate interface with ORO public information counterparts. Copying and distribution of press releases to ORO officials at the JIC will now be the responsibility of the JIC manager (previously the JIC logistics coordinator).

To facilitate our review, the NRC requested ENO to clarify that the affected State and local response organizations had independently performed a review of their applicable plan and concurred with ENO's determination that proposed licensee staffing changes had no adverse impact on ORO's ability to effectively implement their FEMA-approved REP plans, specifically in regard to interface and coordination with the licensee. In response, ENO provided e-mails with the States of Vermont, New Hampshire, and Massachusetts (Enclosures 1-3). Key REP officials from each of the States have confirmed they have not identified any interface or coordination impediments as a result of the elimination of designated positions in the EOF and JIC.

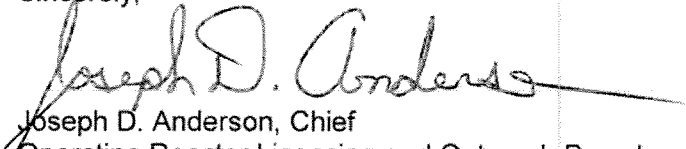
It is our understanding that on June 26, 2014, ENO provided a briefing to the FEMA Region I REP staff, which included a specific discussion regarding the above-referenced proposed ERO changes (ADAMS Accession No. ML14204A344). We have also been informed by ENO that drills will be conducted in the 4th quarter of 2014 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. Per the Memorandum of Understanding between FEMA and the NRC, contained in Section III.B (FEMA Review of Offsite Plans and Preparedness) to Appendix A to 44 CFR Part 353, I am requesting FEMA's review and concurrence of the proposed ENO ERO changes described above to the VY SEP. Based on the licensee's intent to conduct drills utilizing the proposed post-shutdown ERO in the 4th quarter 2014, I am requesting that FEMA provide their assessment by no later than August 29, 2014. Please contact me if FEMA is unable to meet this due date.

V. Quinn

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As always, thank you for your assistance. If you have any questions regarding the specifics of the changes requested to the VY SEP or the NRC's evaluation of these proposed changes, please contact Richard Kinard at (301) 287-3768.

Sincerely,


Joseph D. Anderson, Chief
Operating Reactor Licensing and Outreach Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

Enclosures:

1. New Hampshire–Post
Shutdown ERO Changes
2. Vermont–Post Shutdown
ERO Changes
3. Massachusetts–Post
Shutdown ERO Changes

cc: A. Coons, FEMA HQ

Enclosure 1:

New Hampshire – Post Shutdown ERO Changes

From: [McKenney, Michael P](mailto:McKenney.Michael.P)
To: [Chappell, Coley](mailto:Chappell.Coley); [Couture III, Philip](mailto:Couture.III.Philip)
Subject: FW: Post shut down ERO changes
Date: Friday, June 27, 2014 11:25:44 AM

I pushed for additional clarification.

Mike McKenney

Emergency Preparedness Manager
Entergy Vermont Yankee
office 802 258-4183
pager 802 742-9086
mobile 802 380-2310

From: Becker, Diane [<mailto:Diane.Becker@dos.nh.gov>]
Sent: Friday, June 27, 2014 11:24 AM
To: McKenney, Michael P
Subject: RE: Post shut down ERO changes

Yessir.....that's what we looked primarily for (in addition to direct affects on the plan).

Diane

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From: McKenney, Michael P [<mailto:mmckenn@entergy.com>]
Sent: Friday, June 27, 2014 11:23 AM
To: Becker, Diane
Subject: RE: Post shut down ERO changes

Thanks Diane. Did your review also conclude that that the changes still provide for adequate coordination and interface with your people?

Mike

Mike McKenney

Emergency Preparedness Manager
Entergy Vermont Yankee
office 802 258-4183
pager 802 742-9086
mobile 802 380-2310

From: Becker, Diane [<mailto:Diane.Becker@dos.nh.gov>]
Sent: Friday, June 27, 2014 11:12 AM
To: McKenney, Michael P
Subject: RE: Post shut down ERO changes

Sorry Mike. Thought I had. We are all set and are confident that there will not be any changes needed to our plans. Sorry

Diane

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From: McKenney, Michael P [<mailto:mmckenn@entergy.com>]
Sent: Friday, June 27, 2014 11:09 AM
To: Becker, Diane
Subject: FW: Post shut down ERO changes

Hi Diane,

Do you know when you would be able to get back to me on this?

Thanks,
Mike

Mike McKenney

Emergency Preparedness Manager
Entergy Vermont Yankee
office 802 258-4183
pager 802 742-9086
mobile 802 380-2310

From: McKenney, Michael P
Sent: Tuesday, June 17, 2014 7:22 AM
To: Bornemann, Erica; Giarrusso, John (CDA) (John.Giarrusso@MassMail.State.MA.US); Diane Becker (Diane.Becker@dos.nh.gov); Cederberg, Katharine (CDA)
Subject: Post shut down ERO changes

Hi Folks,

Would you be able to confirm that we didn't miss any needed changes to your plans or procedures associated with the positions we are eliminating from the VY ERO after we shut down and that the changes still provide for adequate coordination and interface with your people? If you could do this by 6/25 and let me know it would be very much appreciated.

You may find our attached our response (previously distributed) to the NRC RAIs regarding the changes helpful.

Pls give me a call if you have any questions.

Thanks,
Mike

Mike McKenney

Emergency Preparedness Manager
Entergy Vermont Yankee
office 802 258-4183
pager 802 742-9086
mobile 802 380-2310

From: McKenney, Michael P [<mailto:mmckenn@entergy.com>]
Sent: Tuesday, May 13, 2014 6:21 AM
To: Flynn, Joe (Joe.Flynn@state.vt.us); Becker, Diane; Giarrusso, John (CDA) (John.Giarrusso@MassMail.State.MA.US)
Cc: Mike McKenney
Subject: RE: VY EPlan submittals and Tri State meeting

Joe/Diane/John,

As a follow up to my previous email below, we've reviewed each of your plans and procedures for potential changes that may result from the reduction of ERO positions which are planned to take effect in the February 2015 timeframe. This review included the EOF Manager and JIC Logistics Coordinator ERO positions. The only changes that we identified were references to the EOF Manager in one of MEMA's procedures and I've communicated the suggested changes with John.

Thanks,
Mike

Mike McKenney

Emergency Preparedness Manager
Entergy Vermont Yankee
office 802 258-4183
pager 802 742-9086
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From: McKenney, Michael P
Sent: Friday, April 25, 2014 9:42 AM
To: Flynn, Joe (Joe.Flynn@state.vt.us); Diane Becker (Diane.Becker@dos.nh.gov); Giarrusso, John (CDA) (John.Giarrusso@MassMail.State.MA.US)
Subject: VY EPlan submittals and Tri State meeting

Hi Folks,

It was good seeing you at the Tri State meeting on Wednesday and having an opportunity to discuss topics that interest all of us including of course, VY Decommissioning Plans. I've attached the two EP related submittals we've made to the NRC in case you haven't received a copy and are interested in reviewing them in more detail. I've also attached a copy of the presentation I gave on Decommissioning Planning.

As I mentioned during the presentation, some of the ERO positions will be eliminated after the plant shuts down and is defueled. The tasks for every ERO position that are being eliminated have been evaluated and tasks that are required have been reassigned to other ERO positions. Also, I discussed that the following two positions that interface with state officials are being eliminated, there would be no impact to you.

- EOF Manager-briefed officials in EOF. Duplicate effort with the Lead Offsite Liaison (not eliminated). Therefore no impact
- JIC Logistics Coordinator-copying and distribution of press releases to state and local officials. Task assumed by the JIC Manager. Therefore no impact

Although I think it is unlikely, I would like to review the State REP plans and procedures to determine if they require revision as a result of these upcoming changes. I am not going to review the local plans since they don't interface with VY ERFs. I have access to Vermont's online, and John is sending me Massachusetts' on disk. I'll give Diane a call to discuss the easiest method on obtaining New Hampshire's.

As always, if you have any questions, please give me a call anytime.
Thanks,
Mike

Mike McKenney

Emergency Preparedness Manager
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pager 802 742-9086
mobile 802 380-2310

Enclosure 2:

Vermont – Post Shutdown ERO Changes