

TO: USNRC DCC

VERMONT YANKEE CONTROLLED DOCUMENT TRANSMITTAL FORM

*NRC File Room
License No DPR-28
Docket No. 50-271*

SECTION 1

DOCUMENT TITLE: IMPLEMENTING PROCEDURES TO THE E-PLAN

COPY NUMBER: 54

CHANGE NUMBER: #184

ISSUE DATE: May 22, 2000

INSTRUCTIONS:

- a. Attached is an authorized controlled copy to the above listed document for retention as your assigned copy.
- b. Review the revised material.
- c. Incorporate new change into the controlled document by document issue date, if applicable.
- d. Ensure that those who use the document are aware of the change.
- e. Destroy all superseded pages.
- f. Destroy obsolete forms and insert new forms into the files.
- g. Sign and date this form and return to the Executive Secretary (ES) or Document Control Center (DCC).
- h. Complete appropriate change information on VY Controlled Document Record of Changes.

TRANSMITTED BY: *[Signature]*
ES or DCC Signature

AFTER COMPLYING WITH THE ABOVE INSTRUCTIONS, PLEASE RETURN TO THE ES OR DCC WITHIN 10 DAYS OF THE ISSUE DATE.

SECTION 2

The undersigned acknowledges completion of the preceding instructions.

Signature of Recipient: _____ Date: _____

A045

NRR-037

EPlan Implementing Procedures

To: Eplan Implementing Procedure Controlled Set Holders
From: Diane McCue *D. McCue*
Date: 05/22/00
Re: VY EPlan Implementing Procedure Change # 184, Instruction Sheet

A Table of Contents if included.

REVISIONS: Please replace the following procedures:

<u>Proc/Rev #</u>	<u>Cancel DI/LPC #</u>	<u>Procedure Title</u>
OP 3505/23		Emergency Preparedness Exercises/Drills
OP 3510/24	2000-03	Off-Site/Site Boundary Monitoring
OP 3531/13	99-129, 99-593, 99-615 LPC-1, LPC-2	Emergency Call-In Method
AP 3532/9	99-594	Emergency Preparedness Organization

VERMONT YANKEE EMERGENCY PLAN IMPLEMENTING PROCEDURES

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May 25, 2000

Emergency Plan Classification and Action Level Scheme	AP 3125	Rev. 16	"R"
Unusual Event	OP 3500	Rev. 18	"R"
Alert	OP 3501	Rev. 19	"R"
Site Area Emergency	OP 3502	Rev. 31	"R"
General Emergency	OP 3503	Rev. 33	"R"
Emergency Communications	OP 3504	Rev. 31	"R"
Emergency Preparedness Exercises and Drills	OP 3505	Rev. 23	"I"
Emergency Equipment Readiness Check	OP 3506	Rev. 38	"R"
Emergency Radiation Exposure Control	OP 3507	Rev. 29	"R"
On-Site Medical Emergency Procedure	OP 3508	Rev. 22	"R"
Environmental Sample Collection During an Emergency	OP 3509	Rev. 16	"R"
Off-Site and Site Boundary Monitoring	OP 3510	Rev. 24	"F"
Off-Site Protective Actions Recommendations	OP 3511	Rev. 11	"R"
Evaluation of Off-Site Radiological Conditions	OP 3513	Rev. 20	"R"
Emergency Actions to Ensure Accountability and Security Response	OP 3524	Rev. 16	"R"
Radiological Coordination	OP 3525	Rev. 9	"R"
Emergency Call-In Method	OP 3531	Rev. 13	"R"
Emergency Preparedness Organization	AP 3532	Rev. 9	"I"
Post Accident Sampling of Reactor Coolant	OP 3533	Rev. 4	"C"
Post Accident Sampling of Plant Stack Gaseous Releases	OP 3534	Rev. 2	"C"
Post Accident Sampling and Analysis of Primary Containment	OP 3535	Rev. 3	"C"
In Plant Air Sample Analysis with Abnormal Condition	OP 3536	Rev. 1	"C"
Emergency Plan Training	OP 3712	Rev. 15	"I"

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3505

REVISION 23

EMERGENCY PREPAREDNESS EXERCISES AND DRILLS

USE CLASSIFICATION: **INFORMATION**, except for Appendix A,
which is classified as **CONTINUOUS**

LPC No.	Affected Pages

Implementation Statement: N/A

Issue Date: 05/25/00

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PURPOSE

This procedure provides the criteria for testing and evaluating the adequacy of emergency facilities, equipment, procedures, communication channels, actions of emergency response personnel and coordination between off-site authorities and the plant.

DISCUSSION

An exercise tests the execution of the overall plant emergency preparedness and the integration of the preparedness with off-site authorities.

A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular emergency response function. Certain drills are conducted as a component of an exercise.

Emergency Preparedness Exercises and Drills are conducted as specified in this procedure to test individual tasks and the overall plant readiness capability to execute the Emergency Plan and its implementing procedures. It outlines the process by which exercises and drills are developed and evaluated.

An Exercise Coordinator, who is appointed by the Director of Safety & Regulatory Affairs (or designated alternate), plans the Emergency Preparedness Exercise/Drill. The Exercise Coordinator may assist the plant personnel in preparing and conducting drills, when requested; otherwise, drill preparation and conduct are by plant personnel.

Plant management has the option to include a fire drill and/or a medical drill during the Emergency Preparedness Exercise or any combination thereof. Plant management has the option to conduct drills, with or without off-site agencies, designed to test the plant's readiness capability.

All weaknesses and deficiencies identified by controllers, are documented as specified in this procedure. Off-site agencies are contacted to inform them of the proposed exercise/date and to determine their degree of participation.

ATTACHMENTS

- | | | |
|----|---------------|--|
| 1. | Table 1 | Generic Reminder List of Scenario-Related Items for the Exercise/Drill Coordinator |
| 2. | Figure 1 | Simulator/Plant Gai-Tronics Link |
| 3. | VYOPF 3505.01 | Emergency Preparedness Exercise/Drill Planning Form |
| 4. | VYOPF 3505.02 | Emergency Exercise/Drill Controller's Evaluation Form |
| 5. | VYOPF 3505.03 | Medical Drill Planning Form |
| 6. | VYOPF 3505.04 | Deleted |
| 7. | VYOPF 3505.05 | Health Physics Drill Planning Form |
| 8. | VYOPF 3505.06 | Off-Site Participation Fire Drill Planning Form |
| 9. | Appendix A | Implementation of the Simulator/Plant Gai-Tronics Link |

REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
 - a. Vermont Yankee Emergency Plan
2. Codes, Standards and Regulations
 - a. 10CFR50.47, 10CFR50.54(q), and 10CFR50 Appendix E
3. Commitments
 - a. EPEX93SC3CPE1
 - b. EPEX93SC2CPE1
 - c. INF89046
4. Supplemental References
 - a. AP 0009, Event Reports
 - b. AP 0028, Commitment Tracking
 - c. OP 3506, Emergency Equipment Readiness Check
 - d. OP 3531, Emergency Call-In Method
 - e. AP 3700, Fire Training
 - f. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

PRECAUTIONS

1. The initiating announcement and subsequent communications associated with drills and the emergency exercises include the words "THIS IS A DRILL".
2. During a simulated accident, no action to materially alter the plant operating conditions are permitted unless previously authorized in writing by the Plant Manager.
3. An emergency exercise is terminated by the Shift Supervisor or higher management at any time plant operational conditions warrant such action.
4. Proper radiation protection controls are maintained and adhered to during drills and exercises.

PREREQUISITES

1. Prior to establishing the exercise/drill date for the Emergency Preparedness Exercise/Drill, the Emergency Plan Supervisor obtains the approval of Vermont Yankee Management.
2. Before initiating a full or partial participation Emergency Preparedness Exercise/Drill, all applicable off-site agencies are made cognizant by the Emergency Plan Supervisor of the intended exercise/drill and a determination made as to their degree of participation. (Refer to VYOPF 3505.01 Emergency Preparedness Exercise/Drill Planning Form.)

3. Before initiating a full or partial participation Emergency Preparedness Exercise/Drill, the Emergency Plan Supervisor verifies the contents of those letters of agreement (which are maintained in Appendix E of the Vermont Yankee Emergency Plan) are still valid (refer to VYOPF 3505.01 Emergency Preparedness Exercise/Drill Planning Form).

PROCEDURE

A. Emergency Preparedness Exercise/Drill

NOTE

A full participation exercise shall be conducted every two years. At least one drill involving a combination of some of the principal functional areas of emergency response shall be conducted in the interval between biennial exercises. State and off-site agencies may participate in drills.

1. Working Exercise/Drill Groups

- a. The following working groups exist solely to support the planning, conduct, and evaluation of the exercise/drill:

1) Exercise/Drill Planning Committee

- a) This group has policy level, broad oversight, and decision-making responsibilities associated with the annual exercise/drill, and is made up of the following members:
 1. Vice President, Vermont Yankee
 2. Director of Safety & Regulatory Affairs
 3. Plant Manager
 4. Exercise Coordinator
 5. Emergency Plan Supervisor
 6. Training Manager
- b) Members of this group have the authority to commit resources from their organizations. This group does not have access to scenario information other than objectives and other information available to participants, such as extent of play.
- c) This group may delegate responsibilities as defined in Section 2 of this procedure to other individuals as warranted.

- d) This group approves the following:
 - 1. Exercise date (if applicable)
 - 2. Training drill date
 - 3. Exercise objectives (if applicable)
 - 4. Training drill objectives
 - 5. Exercise scope (if applicable)
 - 6. Integration of VY and off-site objectives and activities
 - 7. Exercise Coordinator
- e) To ensure that the Exercise/Drill Coordinator is fully cognizant of and has the time to deal with, previous and upcoming exercise issues, the Director of Safety & Regulatory Affairs appoints, within 3 months following an exercise, an Exercise/Drill Coordinator (with previous exercise experience) for the next exercise, and an Exercise/Drill Coordinator designate for the following exercise. (EPEX93SC3CPE1)

2) Exercise/Drill Planning and Support Group

- a) This group, led by the Exercise/Drill Coordinator, consists of individuals made available by the Exercise Planning Committee. The responsibilities of the group include the following:
 - 1. Establish and maintain schedules and punchlists.
 - 2. Interface with off-site groups for preparation and conduct of the exercise/drill.
 - 3. Prepare training for players and controllers.
 - 4. Assemble exercise/drill package.
 - 5. Brief and train NRC officials, as necessary.
 - 6. Conduct critiques.

3) Scenario Development Group

a) This group led by the Exercise/Drill Coordinator, may consist of individuals selected from the following areas of expertise:

1. Operations
2. Reactor Engineering
3. Radiation Protection
4. Chemistry
5. Simulator
6. Security
7. Contracted support, as necessary

b) This group has the following responsibilities:

1. Prepares the scenario.
2. Prepares radiological, plume, and operational data.
3. Develops mini-scenarios and related mock-ups.
4. Performs tests on simulator.
5. Determines plant activities.

4) Exercise/Drill Controller Group

a) This group consists of individuals who are made available by the Exercise Planning Committee and who, under the direction of the Exercise/Drill Coordinator, initiate and direct the events of the scenario and evaluate VY's performance.

2. Individual Responsibilities

a. Director of Safety & Regulatory Affairs

- 1) The Director of Safety & Regulatory Affairs (or designated alternate) has overall responsibility for the Emergency Preparedness Program which includes the Emergency Preparedness Exercise/Drill.

b. Exercise/Drill Coordinator

- 1) The Exercise/Drill Coordinator's responsibilities include the following:
 - a) Ensure for a successful drill and exercise through coordination of the activities of the Exercise/Drill Planning and Support Group, the Scenario Development Group, and Exercise/Drill Controller Group.

NOTE

For full participation exercises, the selected simulated accident tests the various components of on-site and off-site plans and organizations and calls for the mobilization of off-site agencies.

- b) Ensure the Scenario Development Group selects a simulated accident that tests the various elements of the Vermont Yankee Emergency Plan and its implementing procedures.
- c) Prepare a list of all events, recognized by plant personnel, that would be accomplished in an actual emergency, but which are not carried out during the exercise/drill.
- d) Obtain controllers to evaluate the performance of participating personnel and the adequacy of emergency facilities, equipment and procedures during the exercise/drill.
- e) Ensure controllers have had initial controller training as detailed in OP 3712.
- f) Ensure that assumed emergency conditions are translated into simulated instrument responses and information for use during the exercise/drill.
- g) Prepare a set of ground rules for conducting the exercise/drill.

NOTE

The ground rules provide information on the general guidance for conducting the exercise/drill (i.e., what emergency response actions should be or should not be simulated, gamesmanship, designated communication channels for players, non-players and controllers, information regarding manpower/shift reliefs, and general instructions for players, controllers and other personnel).

- h) Prepare an exempt list which defines non-players. This list shall be approved by the Plant Manager.
- i) Prior to commencement of the exercise/drill, the Exercise/Drill Coordinator briefs the controllers on the following:
 - 1. their assignments, which includes providing all the information necessary to fulfill their roles,
 - 2. how to handle a Simulated Plant Process Computer System (SPPCS) loss at their Emergency Response Facility, and
 - 3. ensure that the Simulator Controller is prepared to brief the Simulator operating crew on how a simulator loss will be handled, and expectations of the crew members during this event.
- j) Issue Emergency Exercise/Drill Controller Evaluation VYOPF 3505.02.
- k) Review Table 1 for applicability of generic scenario related items.
- l) Immediately following the exercise/drill, discuss overall results with lead controllers prior to the scheduled critique.
- m) Conduct an exercise/drill critique with controllers.
- n) Ensure that the Plant Emergency Director who participates in a given Emergency Exercise be in attendance at the subsequent NRC debriefing.

- o) If the Simulator ERFIS is being used for the Drill/Exercise, do the following:
1. Ensure that Vernon Process Computer Engineering, at the appropriate time before the Drill/Exercise, enables the ERFIS mobile work stations in the TSC, EOF, Simulator, and ESC to receive and display Drill/Exercise simulated data.
 2. If during the course of the Drill/Exercise, the TSC directs (procedurally) Vernon Process Computer Engineering to enable the ERDS data link with the NRC, ensure that the NRC is aware that forthcoming ERDS data are simulated.
 3. Ensure that appropriate signs are placed on ERFIS work stations indicating that stations are connected to the Simulated Plant Process Computer System (SPPCS).
 4. When the Drill/Exercise is terminated, direct Vernon Process Computer Engineering to do the following:
 - a. Terminate link between the SPPCS and TSC, EOF, Simulator, and ESC mobile work stations, and reconnect these work stations to Plant ERFIS.
 - b. Terminate the SPPCS data link with NRC.
- p) Designate a leader of the Scenario Development Group to assume the primary responsibilities for mini-scenario development, and who possesses experience with the areas which will be demonstrated in these mini-scenarios. (EPEX93SC2CPE1)
- q) If the Simulator is being used for the Drill/Exercise, request the Instrument & Controls Manager to implement Appendix A to establish the Simulator/Plant Gai-Tronics link for the duration of the Drill/Exercise.

c. Emergency Plan Supervisor

- 1) The Emergency Plan Supervisor's responsibilities include the following:
 - a) Ensure that all weaknesses and deficiencies from the exercise/drill critique are documented and resolved as outlined in Section C.
 - b) Maintain a long range plan of exercise/drill objectives for both utility and off-site organizations.
 - c) Ensure the off-site objectives, as well as the manner in which they are met, are presented to the Exercise/Drill Planning Committee and the Scenario Development Group.
 - d) Notify NRC Region I and Resident Inspector of the Emergency Preparedness Exercise date.

NOTE

Submittal dates for exercise objectives and the scenario package are 90 and 60 days prior to the exercise date, respectively.

- e) Prepare and submit the Emergency Preparedness Exercise Objectives and Scenario Package to Vermont Yankee Licensing for submittal to the NRC and FEMA prior to the date of the exercise in accordance with Federal guidance.
- f) To promote confidentiality of the exercise scenario, ensure that the submittal letter has the following statement on each page (INF 89046):

"WITHHOLD ENCLOSURE FROM PUBLIC DISCLOSURE"
- g) Ensure that off-site controllers are provided as necessary.

d. Emergency Planner

- 1) The Emergency Planner provides assistance to the off-site response organizations in planning and preparations for the exercise/drill.
 - a) Assist in determining the off-site objectives for the exercise/drill for each state through active liaison with the States, and FEMA.
 - b) Contact appropriate off-site agencies to determine their degree of participation. Refer to the listing of off-site agencies on the Emergency Preparedness Exercise/Drill Planning Form.
 - c) Ensure that all Letters of Agreement stipulated in Appendix E of the Vermont Yankee Emergency Plan are current, by reviewing findings documented on the Emergency Preparedness Exercise/Drill Planning Form (VYOPF 3505.01). If not current, make necessary update action.

B. Drills

1. Medical Drills

- a. Conduct at least one drill annually to evaluate the training of the plant's medical response team and off-site medical response personnel. This drill may be performed as part of the required annual emergency preparedness exercise, fire drill, or as a stand alone Medical Drill.
- b. The Emergency Plan Supervisor, and Emergency Planner, develop a drill scenario. Utilize the Medical Drill Planning Form, VYOPF 3505.03, for Medical Drill planning and approval.
- c. The Emergency Planner contacts off-site medical response personnel (ambulance and hospital) to request their participation in the drill.
- d. The Emergency Planner contacts the Vernon Police to notify them of the date and time of the drill.
- e. Prior to the drill, the Emergency Planner notifies the following:
 - 1) Director of Public Affairs
 - 2) Radiation Protection Manager
 - 3) Operations Manager
 - 4) Security Manager
 - 5) NRC Resident Inspector
 - 6) Safety Coordinator

- f. The Emergency Planner briefs controllers on the drill and issues Emergency Exercise/Drill Controller's Evaluation Form, VYOPF 3505.02.
- g. The Emergency Planner conducts a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.
- h. All Emergency Exercise/Drill Controller's Evaluation Forms are collected by the Emergency Planner at the conclusion of the critique.

2. Health Physics Drills

- a. A drill is conducted semi-annually which involves response to and analysis of, simulated elevated airborne and liquid samples, and direct radiation measurements in the plant. The semi-annual Health Physics Drills are conducted as follows:
 - 1) One of the drills may be performed as part of the required Emergency Preparedness Exercise/Drill.
 - 2) One of the drills is performed separately, and following the guidelines outlined in this procedure.
 - 3) One of the drills should include use of the post-accident sampling system.

NOTE

Time frame to conduct the drill should allow enough time for obtaining and counting planned drill chemistry samples.

- b. In conjunction with the Chemistry Manager and the Radiation Protection Manager, the EPS directs the development of a drill scenario utilizing the Health Physics Drill Planning Form, VYOPF 3505.05.
- c. The EPS briefs controllers on the drill and distributes Emergency Exercise/Drill Controller's Evaluation Form, VYOPF 3505.02.
- d. The EPS conducts a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.

3. Radiological Monitoring Drills

- a. At least one drill is conducted each year to evaluate on-site and off-site collection and analysis of airborne sample media. This drill may be performed as part of the required Emergency Preparedness Exercise/Drill.

4. Fire Drills

a. Plant's Fire Brigade

A number of drills are conducted annually to test and evaluate the response and training of the plant's fire brigade. These fire drills are conducted per AP 3700, Fire Training.

b. Local Fire Department Participation

The Vernon Fire Department is annually offered the opportunity to participate in an onsite fire drill to demonstrate the coordination between the Vernon Fire Department and the plant's fire brigade. The drill is conducted as follows:

- 1) The Fire Protection Coordinator (FPC) develops a drill scenario utilizing the Off-Site Participation Fire Drill Planning Form, VYOPF 3505.06.
- 2) The FPC briefs controllers on the drill and distributes Emergency Exercise/Drill Controller's Evaluation Form, VYOPF 3505.02.
- 3) The FPC conducts a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.

5. Communication Tests

a. To ensure Emergency Communication Systems are operable between plant and off-site emergency response organizations, conduct Communication Tests as outlined below:

- 1) Communication channels with state governments within the plume exposure pathway are tested monthly as per OP 3506, Emergency Equipment Readiness Check.
- 2) Communications with State Emergency Operations Centers and field monitoring teams are conducted as part of the Emergency Preparedness Exercise/Drill.

6. Augmentation Tests/Drill

- a. Augmentation tests and drill are conducted to verify the adequacy of the Vermont Yankee emergency call-in method for emergency response personnel.
- b. Conduct the following tests or drill as outlined in OP 3531 to ensure that NUREG 0654, Table B1 requirements are met:
 - 1) Weekly functional test of the beepers.
 - 2) Annual off-hours unannounced drill that estimates response time of emergency response organization personnel to their designated emergency response facility.

C. Documentation of the Emergency Exercise/Drill

1. Comments and recommendations identified on VYOPF 3505.02 are dispositioned, within 30 working days of the exercise or drill, as follows:
 - a. EPS shall ensure that items which warrant follow-up actions, are identified and tracked.
2. All weaknesses and deficiencies are dispositioned per AP 0009.
3. Retain records in accordance with AP 6807.

FINAL CONDITIONS

1. All emergency equipment used in the exercise and drill has been inventoried and checked for operability as defined in OP 3506, Emergency Equipment Readiness Check. Any missing or non-operable equipment will be replaced.
2. All documented items requiring corrective action have been corrected or assigned per AP 0028.

TABLE 1

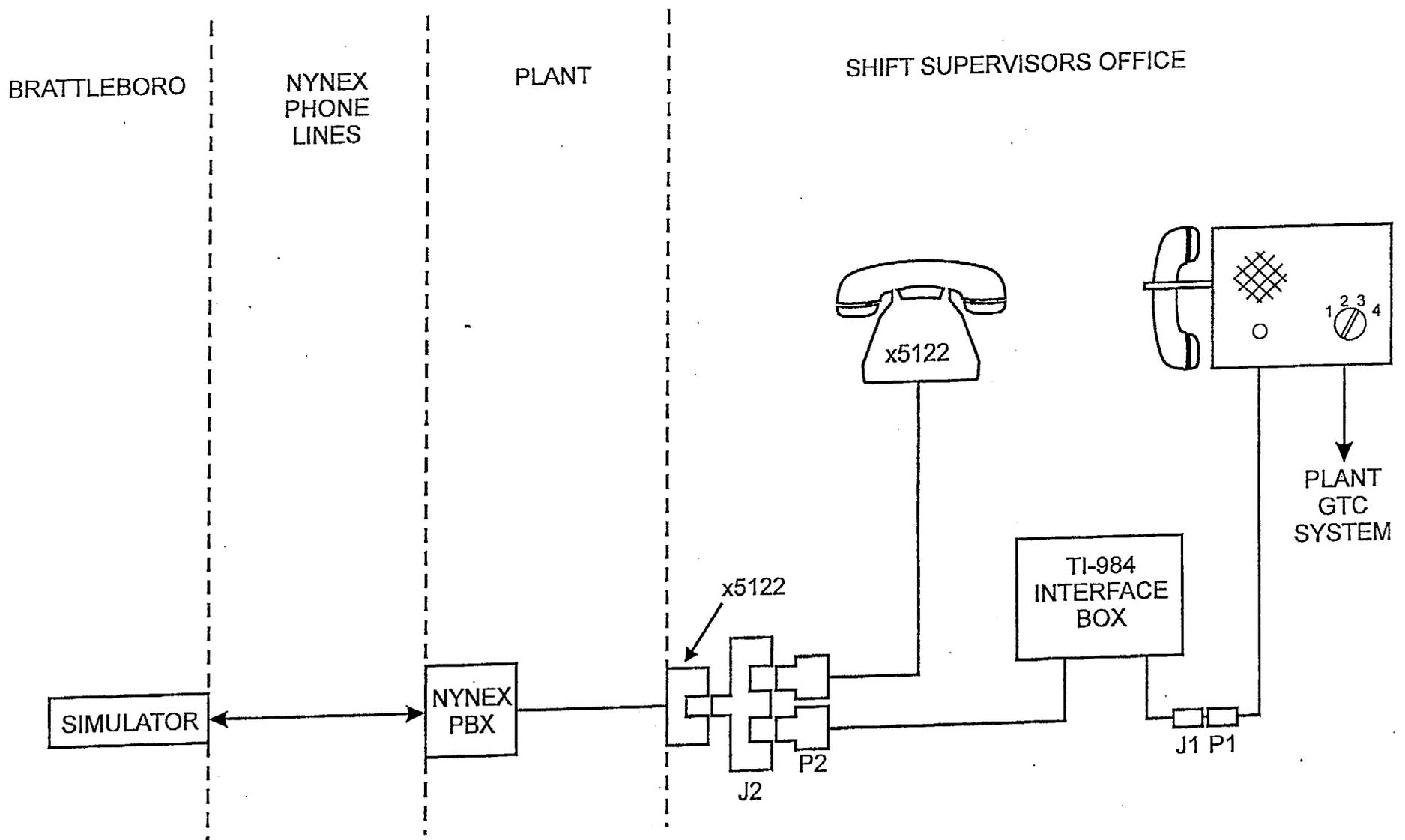
GENERIC REMINDER LIST OF SCENARIO-RELATED ITEMS
FOR THE EXERCISE/DRILL COORDINATOR

1. Review cue cards for proper time frame sequence with scenario events and any prompting information.
2. Define and clarify all simulation versus actual responses.
3. Ensure that EOF Security Access Control has been accounted for in the scenario.
4. Ensure that Exercise/Drill Controllers are adequately trained in the scenario development.
5. Ensure that Controllers for the off-site Field Monitoring Teams are adequately trained in interpreting the off-site plume maps.
6. Review and approve all pre-stages, and ensure that all pre-stages are specified in the exercise manual.
7. Ensure that the scenario allows demonstration of all exercise/drill objectives.
8. Ensure that scenario-related meteorological data are available from the primary and back-up meteorological towers.
9. Ensure that the Gai-Tronics link with the Simulator is operable, and ensure that controller can adequately monitor this communications link. This should include designating a dedicated Gai-Tronics line to be used for communications and messages between the Simulator Control Room and Plant, and designating another dedicated Gai-Tronics line for all other exercise/drill related messages.
10. Ensure that Controllers do not over-control exercise/drill activities in order to meet the time line.
11. If vent stack sampling activities are (or may be) part of the scenario, ensure that doses received by players, as part of these activities, are included in the scenario data in consistent units measured by plant counting techniques and instrumentation.
12. If Post Accident Sampling of the Reactor Vessel is (or may be) part of the scenario, ensure that dose rates for liquid sample are clearly identified in the scenario data as diluted or undiluted and presented in consistent units measured by plant counting techniques and instrumentation.
13. If Reactor Coolant sampling activities are (or may be) part of the scenario, ensure that boron, chloride, and conductivity data, and doses received by players performing these sampling activities, are included in the scenario data in consistent units measured by plant counting techniques and instrumentation.
14. Prepare cue cards for use in the event that ERFIS is lost at any Emergency Response Facility.

TABLE 1 (Continued)

15. Ensure that scenario-related radiological data for the Torus Room and RHR Corner Rooms (on & off), are available in consistent units measured by plant counting techniques and instrumentation.
16. Ensure that the following historical simulator fidelity issues are not an issue:
 - a. Secondary Containment model errors
 - b. Inaccurate area temperature data
 - c. Erroneous ARM data
 - d. Erroneous labels and pen colors in simulator
17. Ensure that Controllers involved with in-plant corrective action team efforts are adequately trained on their responsibilities and assignments for in-plant mini-scenario activities. This should include communication logistics and coordination to control and inform Controller Organization of ongoing in-plant corrective action team efforts being initiated and completed throughout the scenario.
18. If State representatives are participating at the EOF, ensure that Controllers are aware that EOF State activities should be allowed only after the EOF facility activation is initiated.
19. Ensure that notification and message forms to be used as part of the scenario located in the Simulator Control Room are stamped with "THIS IS A DRILL".
20. Ensure that Reactor Engineering information on the scenario-related reactor core and rod pattern sequence, be included with the exercise/drill initial conditions.
21. Expectations on when players should be allowed to "play" following the distribution of exercise/drill initial conditions, should be defined and controlled.

Figure 1 Simulator/Plant Gai-Tronics Link



Temporary Modification for GTC to PBX Connection

EMERGENCY PREPAREDNESS EXERCISE/DRILL PLANNING FORM

In a separate attachment, provide information which addresses the following items:

1. Date of Exercise/Drill
2. Summary Description of Simulated Accident
3. Exercise/Drill Objectives
4. Simulation List (Items that would be accomplished in an Emergency, but will not be carried out for the exercise/drill)
5. Selection of Exercise/Drill Controllers (which includes for each Controller, name, title, and area assigned)
6. Special Instructions to Controllers
7. Pre-Drill Notification of Off-Site Agencies (See Pages 2 - 4 of this form)
8. Emergency Plan Implementing Procedures to be tested

Prepared by: _____ / _____
Exercise/Drill Coordinator (print/sign) Date

Approved by: _____ / _____
Plant Manager (print/sign) Date

EMERGENCY PREPAREDNESS EXERCISE/DRILL PLANNING FORM (Continued)

PRE-DRILL NOTIFICATION OF OFF-SITE AGENCIES:

- A. Yankee Mutual Assistance (Appendix A, DE&S Emergency Support Plan)

Person Contacted: _____ Date: _____
Degree of Participation: _____
_____ Initials: _____

- B. VT Emergency Management Agency

Person Contacted: _____ Date: _____
Degree of Participation/Agreement letter valid: _____
_____ Initials: _____

- C. VT Department of Health

Person Contacted: _____ Date: _____
Degree of Participation: _____
_____ Initials: _____

- D. MA Emergency Management Agency

Person Contacted: _____ Date: _____
Degree of Participation/Agreement letter valid: _____
_____ Initials: _____

- E. MA Radiation Control

Person Contacted: _____ Date: _____
Degree of Participation: _____
_____ Initials: _____

- F. New Hampshire Office of Emergency Management

Person Contacted: _____ Date: _____
Degree of Participation/Agreement letter valid: _____
_____ Initials: _____

- G. New Hampshire Department of Public Health Services

Person Contacted: _____ Date: _____
Degree of Participation/Agreement letter valid: _____
_____ Initials: _____

- H. ANI

Person Contacted: _____ Date: _____
Degree of Participation: _____
_____ Initials: _____

- I. Brattleboro Memorial Hospital

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement letter valid: _____
_____ Initials: _____

EMERGENCY PREPAREDNESS EXERCISE/DRILL PLANNING FORM (Continued)

J. Rescue, Inc.

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement letter valid:

_____ Initials: _____

K. Vernon Fire Department

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement letter valid:

_____ Initials: _____

L. NRC

1. I/E Region I

Person Contacted: _____ Date: _____
Degree of Participation: _____

_____ Initials: _____

2. Senior Resident Inspector

Person Contacted: _____ Date: _____
Degree of Participation: _____

_____ Initials: _____

M. FEMA Region I

Person Contacted: _____ Date: _____
Degree of Participation: _____

_____ Initials: _____

N. Franklin Medical Center

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

O. National Weather Service - Region I

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

P. Quality Inn & Suites

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Contract Valid:

_____ Initials: _____

EMERGENCY PREPAREDNESS EXERCISE/DRILL PLANNING FORM (Continued)

Q. Brattleboro Fire Department

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

R. Town of Vernon

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

S. Institute of Nuclear Power Operations

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

T. Yankee Nuclear Power Station

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

U. Department of Energy

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

V. Duke Engineering & Services

Person Contacted: _____ Date: _____
Degree of Participation (if required)/Agreement Letter Valid:

_____ Initials: _____

EMERGENCY EXERCISE/DRILL
CONTROLLER'S EVALUATION FORM

Controller's Name: _____ Exercise/Drill Date: _____

Exercise/Drill Title: _____

Controller's Location: _____

Observed:	<u>Player</u>	<u>Function</u>
	_____	_____
	_____	_____
	_____	_____

Overall Performance and Observations: (Include the proper and effective use of procedures, equipment and personnel) _____

Comments and Recommendations (Specific): _____

Potential Weaknesses: _____

NOTE

Use additional pages as required.

| Print Name: _____

Signature: _____

| Emergency Plan Review: _____ / _____
(print/sign) Date

MEDICAL DRILL PLANNING FORM

Type of Drill:

Date of Drill:

Location of Drill:

In a separate attachment, provide information which addresses the following items:

1. Description of Drill which includes:
 - a. Initial Conditions
 - b. Narrative Summary
 - c. Time Line
 - d. Detailed Sequence of Events
 - e. Messages
2. Special Hazards and Safety Precautions
3. List of Drill Controllers which includes for each Controller name, title, and area assigned
4. Special Instructions to Controllers
5. Emergency Plan Implementing Procedures to be tested
6. Off-site FEMA objectives to be demonstrated
7. Pre-Drill Notification of Off-Site Agencies
 - a. Medical Facility participating:
 - 1) Brattleboro Memorial Hospital
 - 2) Franklin Medical Center
 - 3) Cheshire Medical Center
 - b. Rescue, Inc.
 - c. Vernon Police Department

Notification documentation should include the following:

- Person contacted
- Degree of Participation
- Date of contact
- Signature of individual making notification

8. Pre-Drill Notification of On-Site Personnel
 - a. Director of Public Affairs
 - b. Radiation Protection Manager
 - c. Operations Manager
 - d. Security Manager
 - e. NRC Resident Inspector

Notification documentation should include the following:

- Person contacted
- Date of contact
- Signature of individual making notification

Approved by: _____ / _____
Plant Manager (print/sign) Date

HEALTH PHYSICS DRILL PLANNING FORM

Type of Drill:

Date of Drill:

Location of Drill:

In a separate attachment, provide information which addresses the following items:

1. Description of Drill which includes:
 - a. Initial Conditions
 - b. Narrative Summary
 - c. Time Line
 - d. Detailed Sequence of Events
2. Special Hazards and/or Safety Precautions
3. List of Drill Controllers which includes for each observer name, title and area assigned
4. Special Instructions to Controllers
5. Emergency Plan Implementing Procedures to be tested

Approved by: _____ / _____
Chemistry Manager (print/sign) Date

Approved by: _____ / _____
Radiation Protection Manager (print/sign) Date

APPENDIX A

IMPLEMENTATION OF THE SIMULATOR/PLANT GAI-TRONICS LINK

Description

This appendix describes the process to temporarily (for drill/exercises purposes) establish a configuration which connects Line 3 of the Plant Gai-Tronics System to the NYNEX telephone line [REDACTED] via a GTC Interface Box (TI-984).

Impact on Operations

The TI-984 (installed in the Shift Supervisor's office) allows outside calls to tie into the Gai-Tronics System to make drill/exercise related pages and conduct party line calls with plant personnel on Line 3. This installation does not preclude the use of Line 3 by plant personnel.

Design Requirements

- Gai-Tronics TI-984 Interface Box
- Installed GTC desk set with existing connector
- RJ-11PBX connection (already installed at [REDACTED])

Restoration Requirements

- Link should be disconnected no later than one day after the drill/exercise
- Verify normal operation of Line 3 of Gai-Tronics

Implementation (See Figure 1)

J or L	Drawing No.s	Location	Description	Installed By/Date Verified By/Date (print/sign)	Removed By/Date Verified By/Date (print/sign)
J	G191302	Control Rm. SS Office	J2 to P2 to Conn. TI-984 to PBX		
J	G191302	Control Rm. SS Office	J1 to P1 to Conn. TI-984 to GTC Conn.		
L	Gai-Tronics C70307	Cable Vault	Line 3 Balance Resistor		

	Shift Supervisor (print/sign)	Date
Installation Authorized by:		
Restoration Authorized by:		
Restoration Completed		

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3510

REVISION 24

OFF-SITE AND SITE BOUNDARY MONITORING

USE CLASSIFICATION: **REFERENCE**

LPC No.	Affected Pages

Implementation Statement: N/A

Issue Date: 05/25/00

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PURPOSE

To establish a procedure for surveying and reporting off-site and site boundary radiological conditions to the Emergency Operations Facility (EOF) Coordinator.

This procedure also specifies the methods used for surveying plant evacuees reporting to the Governor Hunt House.

DISCUSSION

The prime objective of the Off-Site and Site Boundary Monitoring Teams is to rapidly survey areas downwind of the plant site in order to determine the extent and magnitude of any release of radioactive material following an incident. Decisions regarding the extent and types of protective actions required by the public will be based upon initial data reported by the survey teams.

The task of each monitoring team is to collect radiological data and air samples, and transmit the results to the EOF. Prior to the EOF becoming operational, the OSC will assign personnel to the monitoring teams. When radio communication is established with the TSC, the TSC will assume responsibility for and direct the monitoring teams as needed. When the EOF becomes operational, the Radiological Coordinator will assume responsibility and lead the overall direction of the teams. Unless directed otherwise by the Radiological Coordinator, the basic duties and responsibilities of the monitoring teams are as follows:

Site Boundary Team

Obtains a dose rate reading and an air sample, at the site boundary downwind location where maximum radiation levels are detected. The data obtained are radioed to the EOF.

Off-Site (Green)

Proceeds off-site to inner predetermined sample location in downwind sector (i.e., green dot in appropriate downwind sector on area map) obtaining radiation level readings enroute and an air sample when on station. The data obtained are radioed to the EOF.

Off-Site (Blue)

Proceeds off-site to the vicinity of the outer predetermined sample location in downwind section (i.e., blue dot in appropriate downwind sector of area map) and transverses the plume to determine maximum radiation levels, or the plume centerline. An air sample is taken at that location and data obtained are radioed to the EOF.

An additional off-site team may be deployed at the discretion of the Radiological Coordinator. The color designation will be the "Black" Team and will be directed by the Radiological Coordinator. The same procedure will be followed as with the Green or Blue Teams.

The overriding consideration in the initial survey is speed combined with reasonable accuracy. Information is required with as little delay as possible; therefore, the survey consists of simple methods to approximate the magnitude of the accident. Once the initial urgency of the situation is satisfied, subsequent surveys and/or analysis may be made to obtain more accurate detailed information and a more precise evaluation. Additionally, samples will be collected and returned to the EOF for further analysis as the emergency and recovery phases continue.

The Governor Hunt House (GHH) serves as an assembly and monitoring area for contractors and visitors under conditions which require plant evacuation. The GHH Monitoring Team at the Site Area Emergency or General Emergency (not preceded by an Alert Declaration), monitor all personnel for contamination as they arrive from the plant. Contaminated personnel are dressed in appropriate protective clothing and sent to the EOF/RC for decontamination.

Members of the GHH Monitoring Team are assigned by and report to the OSC Coordinator.

ATTACHMENTS

1. Table I 10 Cubic Feet Air Sample I-131 Cartridge Results
2. Figure 1 Filter/Cartridge Collection Envelope - Example Label

REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
 - a. None
2. Codes, Standards, and Regulations
 - a. None
3. Commitments
 - a. EPEX-9905C2_00
 - b. EPEX8803CPE1
4. Supplemental References
 - a. DP 0530, Report #51
 - b. OP 3525, Radiological Coordination
 - c. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

PRECAUTIONS

1. Use care not to contaminate monitoring equipment.
2. During foul weather, use care not to damage filters by exposing them to the elements (e.g., sample under hood or inside car).
3. The individual driving the vehicle shall not perform radio communications or take radiological readings while he is driving the vehicle.
4. Boundary and off-site teams should attempt to minimize their radiation exposure while performing their duties.
5. The monitoring teams should inventory their kits on the mezzanine of the Administration Building not in the OSC hallway.

NOTES

- The deployment of Site Boundary and Off-Site Teams will be initially directed by the Technical Support Center (TSC). Once the EOF becomes operational, the Radiological Coordinator will assume the responsibility and direction of these teams. The Site Boundary Team may be dispatched initially by the Plant Emergency Director (PED).
- The radio base units will be designated and referred to as:
 1. TSC
 2. EOF

PREREQUISITES

1. If any equipment malfunctions or is missing, notify the appropriate facility.

PROCEDURE

1. Site Boundary Team

Team Members:

_____ Date _____
_____ Time _____

Initial

- A. Obtain Site Boundary Monitoring Kit, battery-powered air sampler, Eberline RM-14, and dose rate meter (PIC-6).
- B. Perform the following checks:

NOTE
Steps 1, 2, 3, and 4 can be performed in parallel.

- 1) Air Sampler

NOTE
During a drill, silver zeolite will be simulated with charcoal cartridges.

- a. Ensure that a new filter paper and silver zeolite cartridge are properly installed in their respective holders.

b. Perform operability check. _____

NOTE

The purpose of the operability check of the battery-powered air sampler is to verify that it is functional prior to leaving the plant.

1. Remove a battery from the charger (located in the E-Kit storage area in the OSC) or use a vehicle battery prior to leaving the plant.
 - a) IF the air sampler has a plug-in type electrical connection, THEN plug it into the battery.
 - b) IF the air sampler has a jumper cable type electrical connection, THEN attach the positive jumper cable to the positive terminal on the battery and the negative jumper cable to the negative terminal on the battery.
2. Place the switch in the ON position.
3. Verify that the air sampler is drawing air across the filter paper.
(EPEX-99OSC2_00)

c. Record the serial #: _____

d. Check calibration date: _____

2) RM-14

- a. Turn range switch to BATTERY CHECK position and ensure meter reads in the BATT OK range. _____
- b. Ensure that the response switch is in SLOW position and that the test switch in back (if present) is in the DOWN position. _____
- c. Verify an upscale meter response on all 3 scales by use of the check source in the Emergency Kit. _____

- d. Record serial # _____.
- e. Check calibration date. _____
- 3) PIC-6
 - a. Turn range switch to BATTERY CHECK position and verify that the battery condition is within the BATT OK range. _____
 - b. Verify an upscale meter response on the mR/hr scale by use of the check source in the Emergency Kit. _____
 - c. Record serial # _____.
 - d. Check calibration date. _____
- 4) Rezero high range dosimeter if necessary and note initial reading of each. Check and note exposure periodically.

NOTE

Inform the appropriate facility by radio in the event a high range dosimeter exceeds 1 R while performing this procedure.

NAME	REM	TIME	REM	TIME	TOTAL
					REM
					REM
					REM

- C. Obtain potassium iodide (KI) from TSC and respirators from OSC. The Rad Assistant will provide guidance on usage of KI and respirators per OP 3525. _____

- D. Obtain one portable radio per team from Gate 2 or Gate 1.
 - 1) Check operability of radio as follows:
 - a) Place frequency selector switch to position 3.

NOTE

In the event of failure of Freq. 3 in the field, switch to Freq. 1.

- b) In a normal voice and with microphone approximately 8-10 inches in front of mouth, push microphone button and say: "(TSC or EOF) this is the Site Boundary Team requesting a radio check. Do you read me?" Release microphone button. (The facility base radio should respond to your call).
 - 2) Radio operable and contact made with TSC/EOF.
- E. Contact the appropriate facility and say: "(TSC or EOF) this is the Site Boundary Team. We are in the ready condition, what is the wind direction and type of release? Over."
 - 1) Record Wind Direction: _____
 - 2) Record Type of Release: _____

"Site Boundary Team will be proceeding to the downwind sector unless you have special instructions for us. Over."

- F. Determine downwind location at site boundary where maximum radiation levels are detected. Wear respiratory protection during this evolution.

G. Perform the following surveys (steps G.1 through 3 can be performed in parallel).

- 1) Using the PIC-6, perform the following survey: (Use RM-14 if dose rate is less than 1 mR/hr.)

NOTE

All teams report the following readings by radio to the appropriate facility.

- a) Monitor the radiation level at waist height.
Counts per minute _____, or _____
mR/hr _____, or _____
R/hr _____
Time _____

- b) Check the radiation level 2 inches above the ground. _____
Counts per minute _____, or _____
mR/hr _____, or _____
R/hr _____

- 2. If using the Radeco H-809C air sampler or HV-1BC air sampler:

NOTE

A "Standard" air sample is collected at 1 CFM for ten minutes (or a total of 10 cubic feet).

- a) Connect the leads to the car battery or the portable battery. Turn the power switch ON. Record Start Time _____, and start the stopwatch. _____

- b) Record the flow (in CFM) _____ for the beginning of the 10 minute (or as otherwise directed) sample on the air sample envelope. _____

c) After the sample time has elapsed, note the flow (in CFM) _____ and record on the air sample envelope. _____

d) Turn the power switch to the OFF position. Record Time Off _____, and stop the stopwatch and record total minutes _____. Disconnect the air sampler from the battery. _____

3. Move to a low background area and use the RM-14 to perform the following:

a) Check RM-14 background level. Find an area that is <2000 cpm.

Record background _____ cpm _____

b) Remove silver zeolite cartridge, wrap in parafilm, and place in probe holder on RM-14. Place filter paper in properly labeled envelope (see Fig. 1). _____

c) Place the probe directly over the silver zeolite and obtain count rate of sample after the needle stabilizes.

Record gross count rate ____ cpm _____

d) Correct for background in the following manner:

Gross Count Rate (from Step G.3.c) ____ cpm

minus -

Background (from Step G.3.a) ____ cpm

equals =

NET cpm ____ cpm _____

H. Reporting air sample results:

1) If the air sample was a "Standard" air sample:

a) Refer to Table I "NET cpm" column and locate net cpm value of Step G.3.d above and note the corresponding "Air Code" number.

Record "Air Code" number _____.

b) Report the "Air Code" number and the sample collection time to the appropriate facility.

2) If the air sample is not a standard air sample, inform the appropriate facility that this is a "NON-Standard" air sample and record and report as applicable:

a) Time ON _____

b) Flow ON _____ CFM

c) Time OFF _____ or total minutes _____

d) Flow OFF _____ CFM

e) Air sample NET cpm from Step G.3.d above.

3) Place cartridge and particulate filter in separate envelopes (see Fig. 1) and contact the appropriate facility to determine instructions on how fast they desire the sample, plus the method/time frame for delivery to Radiological Coordinator.

I. Check and log on Section 1, Step B.4 high range dosimeter reading. Notify the appropriate facility by radio in the event of high range dosimeter exceeds 1 R.

J. Contact the appropriate facility and request further instructions.

K. If a new location is assigned, repeat Steps G through K as required.

2. Off-Site (Green and Blue Teams)

Team Name _____

Team Members _____ Date _____

_____ Time _____

A. Obtain Off-Site Monitoring Kit, air sampler, Eberline RM-14, and dose rate meter (PIC-6). _____

B. Perform the following checks:

NOTE
Steps 1, 2, 3 and 4 can be performed in parallel.

1) Air Sampler

NOTE
During a drill, silver zeolite will be simulated with charcoal cartridges.

a) Ensure that a new filter paper and silver zeolite cartridge are properly installed in their respective holders. _____

b) Perform operability check.

NOTE

The purpose of the operability check of the battery-powered air sampler is to verify that it is functional prior to leaving the plant.

1. Remove a battery from the charger (located in the E-Kit storage area in the OSC) or use a vehicle battery prior to leaving the plant.
 - a) IF the air sampler has a plug-in type electrical connection, THEN plug it into the battery.
 - b) IF the air sampler has a jumper cable type electrical connection, THEN attach the positive jumper cable to the positive terminal on the battery and the negative jumper cable to the negative terminal on the battery.
2. Place the switch in the ON position.
3. Verify that the air sampler is drawing air across the filter paper.
(EPEX-99OSC2_00)

c. Record the serial #: _____

d. Check calibration date: _____

2) RM-14

- a) Turn range switch to BATTERY CHECK position and ensure meter reads in the BATT OK range. _____
- b) Ensure that the response switch is in SLOW position and that the test switch in back (if present) is in the DOWN position. _____
- c) Verify an upscale meter response on all 3 scales by use of the check source in the Emergency Kit. _____

Initial

- d) Record serial # _____.
- e) Check calibration date. _____
- 3) PIC-6
 - a) Turn range switch to BATTERY CHECK position and verify that the battery condition is within the BATT OK range. _____
 - b) Verify an upscale meter response on the mR/hr scale by use of the check source in the Emergency Kit. _____
 - c) Record serial # _____.
 - d) Check calibration date. _____
- 4) Rezero high range dosimeters, if necessary, and note initial reading of each. Check and note exposure periodically.

NOTE

Inform the appropriate facility by radio in the event a high range dosimeter exceeds 1 R while performing this procedure.

NAME	REM	TIME	REM	TIME	TOTAL
					REM
					REM
					REM

- C. Obtain potassium iodide (KI) from TSC and respirators from OSC. The Rad Assistant will provide guidance on usage of KI and respirators per OP 3525. _____

D. Obtain a company vehicle from Gate 2. Complete radio operability check before leaving site.

- 1) Check operability of radio as follows:
 - a) Place frequency selector switch to position 3.

NOTE

In the event of failure of Freq. 3 in the field, switch to Freq. 1.

- b) In a normal voice and with microphone approximately 8-10 inches in front of mouth, push microphone button and say: "TSC or EOF (whichever is in control), this is (specify team) Team requesting a radio check. Do you read me?" Release microphone button. (The facility base radio should respond to your call.)

2) Radio operable and contact made with the EOF.

E. Contact the appropriate facility and say: (EOF or TSC) this is (specify team) Team. We are in the ready condition, what is the wind direction and type of release? Over."

- 1) Record Wind Direction: _____
- 2) Record Type of Release: _____
- 3) Record RM-14 Background Level: _____cpm

"(Specify team) Team will be proceeding to the downwind sector unless you have special instructions for us. Over."

F. Unless otherwise specified by the EOF or TSC, as applicable:

Green Team proceeds directly to inner (green) down wind sample location.

Blue Team proceeds to vicinity of outer (blue) sample location and attempts to locate the approximate centerline of plume prior to taking air sample.

NOTE

The following step is intended to locate the approximate plume boundary. Do not stop to determine a precise location.

- G. While enroute, team passenger holds probe of RM-14 inside car window (shielded from wind) and notes the approximate location at which the background level recorded in E.3) above doubles.

Record Location _____

- H. While enroute, record additional readings at easily identified landmarks:

<u>Location</u>	<u>Time</u>	<u>Reading (Circle one)</u>	
_____	_____	_____ (RM-14)(PIC-6)	
_____	_____	_____ (RM-14)(PIC-6)	
_____	_____	_____ (RM-14)(PIC-6)	
_____	_____	_____ (RM-14)(PIC-6)	
_____	_____	_____ (RM-14)(PIC-6)	_____

NOTES

- Announce actual measurements over radio: simply refer to them as "counts per minute", "mR/hr", or "R/hr".
- Step I below for "blue" team only. (Green team proceed to step J.)

I. Blue Team, in the vicinity of the outer (blue) sample location on map, seek out nearest roads crossing the direction of the plume and determine the location of the maximum reading as precisely as possible.

NOTE

While crossing the plume, a rapid dose rate change is not anticipated. Look for a wide maximum plateau and do not spend more than 5 minutes in selecting a sampling location.

1) Record the following:

Location _____

Dose Rate Reading _____ (RM-14) (PIC-6) Circle One

Time _____

2) Contact the appropriate facility and advise the radio operator your team is on location and summarize the results of Steps G, H, and I.

J. Green Team, contact the appropriate facility and advise radio operator your team is on location and summarize the results of Steps G and H.

NOTE

While on station, keep the appropriate facility advised of any significant changes in radiation levels, wind direction, rain, etc.

- K. Upon arrival at sampling location, ensure that the release cloud has arrived by observing stable elevated RM-14 or PIC-6 background, or by calculating arrival time based on wind speed. _____

- L. Perform the following surveys: (steps L.1 through 3 can be performed in parallel).
 - 1. Using the PIC-6, perform the following survey: (Use RM-14 if dose rate is less than 1 mR/hr.)

NOTE

All teams report the following readings by radio to the appropriate facility.

- a) Monitor the radiation level at waist height.

Counts per minute _____, or _____
mR/hr _____, or _____
R/hr _____
Time _____

- b) Check the radiation level 2 inches above the ground.

Counts per minute _____, or _____
mR/hr _____, or _____
R/hr _____

2. If using the Radeco H-809C air sampler or HV-1BC air sampler:

NOTE

A "Standard" air sample is collected at 1 CFM for ten minutes (or a total of ten cubic feet).

- a) Connect the leads to the car battery or portable battery. Turn the power switch ON, and record Start Time _____, and start the stopwatch. _____
 - b) Record the flow (in CFM) _____ for the beginning of the 10 minute (or as otherwise directed) sample on the air sample envelope. _____
 - c) After the sample time has elapsed, note the flow (in CFM) _____, and record on the air sample envelope. _____
 - d) Turn the power switch to the OFF position. Record time OFF _____, and stop the stopwatch and record total minutes _____. Disconnect the air sampler from the battery. _____
3. Move to a low background area and use the RM-14 to perform the following:
- a) Check RM-14 background level. Find an area that is < 2000 cpm.
Record Background _____cpm _____
 - b) Remove silver zeolite cartridge, wrap in parafilm, and place in probe holder on RM-14. Place filter paper in properly labeled envelope (see Fig. 1). _____
 - c) Place the probe directly over the silver zeolite and obtain count rate of sample after the needle stabilizes. _____
Record gross count rate _____cpm _____

d) Correct for background in the following manner:

Gross Count Rate (from Step L.3.c) ____cpm

minus -

Background (from Step L.3.a) ____cpm

equals =

NET cpm ____cpm

NOTE

Telephone - In the event of a radio breakdown, proceed to nearest available phone and call 802-257-7711 or 802-257-5271.

M. Reporting air sample results:

1) If the air sample is a "Standard" air sample:

a) Refer to Table 1:Net CPM" column and locate Net cpm value of Step L.3.d above and note the corresponding "Air Code" number.

"Air Code" number _____

b) Report the "Air Code" number, the sample collection time, and location to the appropriate facility.

1. To make initial call, say: "(EOF or TSC), this is _____ (specify team color) Team. Over."

2. When the facility responds:

"We are located at _____ and our sample is from _____. The sample result is Air Code #_____. The sample collection time is _____. Over".

3. In the event radio communications cannot be established at sampling locations, seek higher elevations, then attempt to contact appropriate facility or relay message through other teams.
- 2) If the air sample is not a standard air sample, record as applicable:
- a) Time ON _____
 - b) Flow ON _____ CFM
 - c) Time OFF _____ or total minutes _____.
 - d) Flow OFF _____ CFM
 - e) Air sample Net cpm from Step L.3.d above.
 - f) Report the air sample information and location to the appropriate facility.
 1. To make initial call, say: "(EOF or TSC), this is _____ (specify team color) Team. Over." _____
 2. When the facility responds:

"We are located at _____ and our sample is from _____. The air sample results are (report results from 2)a), 2)b), 2)c), 2)d), 2)e), above). This is a "NON-Standard" air sample. Over". _____
 3. In the event radio communications cannot be established at sampling locations, seek higher elevations, then attempt to contact appropriate facility or relay message through other teams.
- 3) Place cartridge and particulate filter in separate envelopes (see Figure 1) and contact the appropriate facility to determine instructions on how fast they desire the sample, plus the method/time frame for delivery to Radiological Coordinator. _____
- N. Check and log on Section 2 Step B.4 high range dosimeter. Notify the appropriate facility by radio in the event a high range dosimeter exceeds 1 R. _____

- O. Survey your equipment and yourselves for contamination using the RM-14.
- P. If contamination is found, notify the appropriate facility.
- Q. Contact the appropriate facility and request further instructions.
- R. If a new location is assigned, perform Section 2 as required.

3. Governor Hunt House Monitoring Team

Team Members:

_____ (Leader) Date _____

_____ Time _____

The Team Leader or designee performs the following steps (EPEX8803CPE1):

- A. Obtain RM-14s, one PIC-6A, and a portable radio (from Gate 2 or Gate 1), and perform the following checks:

1) RM-14

- a. Turn range switch to BATTERY CHECK position and ensure meter reads in the BATT OK range. _____
- b. Ensure that the response switch is in SLOW position and that the test switch in back (if present) is in the DOWN position. _____
- c. Verify an upscale meter response on all 3 scales by use of the check source in the Emergency Kit. _____
- d. Check calibration date. _____

- 2) Site Area Emergency or General Emergency not preceded by a Declaration of an Alert
 - a. Frisk all contractors and visitors as they arrive (low background area).
 - b. Release personnel if readings are less than 2X background or < 2000 net cpm. If contamination found is greater than 2X background or 2000 net cpm, whichever is less, perform the following:
 - 1) Assess contaminated areas and dress personnel in appropriate protective clothing (paper coveralls, cloth gloves, booties, etc.).
 - 2) Send personnel to EOF/RC for decontamination.
 - 3) Notify the Personnel Equipment Monitoring Team at the EOF/RC the names of the personnel to be reporting to the facility.
 - c. Give "CONTRACTOR EXIT PASSES" to all contractors and visitors that have been monitored.
 - d. Direct contractors and visitors to retrieve their vehicles from the parking lot, hand their "CONTRACTOR EXIT PASS" to the security officer at Gatehouse 1 and leave site.
- G. Upon completion of duties, notify OSC Coordinator for additional instruction or assistance that may be required.
- H. Return to the OSC, and report any pertinent information to the OSC Coordinator or designated Assistant for the RP Log.

FINAL CONDITIONS

1. Return radio to proper location.
2. Return Emergency Kit and equipment to the Operations Support Center.
3. Submit completed copy of this procedure to the Radiological Assistant at the EOF.
4. Turn in all dosimeters to the Radiological Assistant at the EOF.
5. The Emergency Plan Coordinator will ensure records are filed in accordance with AP 6807.

TABLE I

10 CUBIC FEET AIR SAMPLE I-131 CARTRIDGE RESULTS

<u>"AIR CODE"</u>	<u>NET CPM</u>
0	<40
1	40
3	80
4	100
5	125
6	150
7	175
8	200
9	225
10	250
11	275
12	300
13	325
14	350
15	375
16	400
17	425
18	450
19	500
20	750
21	1000
22	1250
23	1500
24	1750
25	2000
26	2250
27	2500
28	2750
29	3000
30	3250
31	3500
32	3750
33	4000
34	4250
35	4500
36	5000
37	7500
38	10000
39	12500
40	15000
41	17500
42	20000
43	25000
44	30000
45	35000
46	40000
47	50000

FIGURE 1

FILTER/CARTRIDGE COLLECTION ENVELOPE - EXAMPLE LABEL

FILTER/CARTRIDGE COLLECTION ENVELOPE

DATE:	<u>AIR SAMPLER TIMES</u>	<u>AIR SAMPLER FLOW RATES</u>
TEAM:	START: _____	START: _____CFM
LOCATION:	STOP: _____	STOP: _____CFM
<u>ENCLOSED (CHECK ONE)</u>	ELAPSED: _____ (MIN)	
FILTER: _____	<u>SAMPLE COUNT (CPM)</u>	
CARTRIDGE: _____	GROSS: _____ (CPM)	
<u>SIGNATURE:</u>	BACKGROUND: _____ (CPM)	
	NET: _____ (CPM)	

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3531

REVISION 13

EMERGENCY CALL-IN METHOD

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PURPOSE

To provide the Security Shift Supervisor (SSS) instructions for emergency response personnel notifications made when the VY Emergency Plan has been activated. This procedure also provides instruction for performing weekly tests and an annual drill to verify the adequacy of the Emergency Call-In Method.

DISCUSSION

In the event the Vermont Yankee Emergency Plan is activated by the Shift Supervisor/Plant Emergency Director (SS/PED), the Security Shift Supervisor (SSS) is responsible to initiate activation of the Emergency Call-In Method through the use of the CAN system, activate the VY pagers, call the VY Office in Brattleboro and the Plant Support Building, and activate the DE&S pagers. Section I of this procedure contains the steps the SSS should follow for notifications required during activation of the Emergency Call-In Method.

Section II describes the steps the SSS should follow if the SS/PED requests an Alternate Communicator be contacted to report to the Control Room.

Section III describes the following two means to verify the adequacy of the Vermont Yankee Emergency Call-In Method:

1. A weekly functional test of the pager system to selectively test pager performance will be conducted.
2. An annual off-hours, unannounced communications drill, using the Vermont Yankee Emergency Call-In Method, to estimate emergency personnel response times will be conducted.

Section IV describes the steps that the SSS should follow to notify the paging company that the group paging capability is out of service.

Section V describes the steps that the SSS should follow to initiate the Alternate Emergency Call-In Method for emergency response personnel call-ins and notifications if required.

ATTACHMENTS

1. VYOPF 3531.01 Weekly Pager Functional Test

REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
 - a. VYNP Emergency Plan
 - b. VYNP Implementing Procedures to the Emergency Plan
2. Codes, Standards, and Regulations
 - a. NUREG 0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
3. Commitments
 - a. None
4. Supplemental References
 - a. Emergency Call-In List
 - b. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

I. EMERGENCY CALL-IN METHOD

NOTES

- If the initial Emergency Classification is an Unusual Event, the emergency call-in method is activated for the Unusual Event. If there are subsequent escalations in the Emergency Classification, the emergency call-in method is only activated for that first subsequent escalation in the Emergency Classification.
- If the initial Emergency Classification is an Alert or higher, the emergency call-in method is activated for that initial Emergency Classification. For any subsequent escalation in the Emergency Classification, the emergency call-in method is not activated.

A. Upon receiving notification of an Unusual Event, Unusual Event (Terminated), Alert, Site Area Emergency, or General Emergency, the SSS or designated alternate shall:

1. Activate the Emergency Call-In Notification System as follows:

- a. Contact the Community Alert Network (CAN) Operator at [REDACTED].
- b. If you are connected to the CAN Hotline recording, do the following, otherwise go to Step 1.c:

1) Provide the following message when requested:

"This is _____, the Security Shift Supervisor at Vermont Yankee.

My password is _____.

My callback number is _____."

2) Proceed to Step 1.c when CAN callback is received.

3) If the call-back is not received in a reasonable amount of time given the current emergency circumstances, proceed to Section VI to implement the Alternate Emergency Call-In Method.

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c. When contact is made with the CAN Operator, implement the following steps:

1) Report the following to the CAN Operator:

"This is _____, the Security Shift Supervisor at Vermont Yankee.

(Pause approx. 5 seconds)

My password is _____.

(Pause approx. 5 seconds)

My callback number is _____.

2) The CAN Operator will verify that you have activation authorization (approx. 30 seconds), and will then ask you for the **Event Type** [Select one from below]:

___ Unusual Event

___ Unusual Event Terminated

___ Alert

___ Site Area Emergency

___ General Emergency

3) The CAN Operator will ask you the **Event Time** (which is the declaration time _____Hours.)

4) The CAN Operator will then tell you which of the following 800 telephone numbers should be used for pager holder call-backs:

___ [REDACTED]

___ [REDACTED]

___ Other: _____ - _____

5) Record the following:

Date _____ Time _____ Person Contacted _____

and hang up.

Initials (Security) _____

d. Activate the VY Pager System as follows:

1) Dial [REDACTED]

2) After hearing the verbal prompt, dial in password 5787.

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NOTE

A display of "111" is used for Unusual Event (Terminated).

- 3) After hearing the verbal prompt, press the buttons listed below for the appropriate Emergency Classification and pager holder call-back number (determined in Step c), and then hang up:

NOTE

XXX XXXX is the 7-digit pager holder call-back telephone no. determined in the previous step.

<u>EMERGENCY CLASSIFICATION</u>		<u>BUTTONS PRESSED</u>
Unusual Event	-	111 XXX XXXX
Alert	-	222 XXX XXXX
Site Area	-	333 XXX XXXX
General	-	444 XXX XXXX

- 4) If indications are received that the group paging capability is out of service, implement the emergency paging company notification specified in Section IV.
- e. Contact the VY Switchboard at ext. [REDACTED] or 9-257-5271, if staffed, and request the operator announce the emergency classification and declaration time over the office paging system.

Date_____ Time_____ Person Contacted_____

Initials: _____
(Security)

- f. Contact the Plant Support Building by dialing 3002 and announcing the emergency classification and declaration time over the office paging system.

Date_____ Time_____ Initials (Security):_____

- g. Activate the DE&S Personnel Pager system as follows:

- 1) Dial [REDACTED].
- 2) Wait for one (1) long tone on phone and dial in code number 10597.

NOTES

- The five-digit code number activates the DE&S group call system.
- Use "14 1 #" for Unusual Event (Terminated).

3) After hearing another tone, press the buttons listed below for the appropriate Emergency classification:

UNUSUAL EVENT	-	14 1 #
ALERT	-	14 2 #
SITE AREA	-	14 3 #
GENERAL	-	14 4 #

NOTE

If the verbal closeout is not heard, repeat Steps g.1) through g.4).

4) Listen for the verbal closeout and a busy signal, and hang up. Your message has been transmitted.

- h. If a CAN callback to confirm successful activation is not received within 5 minutes, call the CAN Operator at 9-1-800-██████████ to determine status.
- i. If indications are received from the CAN Operator that the method failed to activate, implement the Alternate Emergency Call-In Method specified in Section V.

2. After receiving CAN callback to confirm successful activation, notify the Shift Supervisor/Plant Emergency Director (SS/PED) that the Emergency Call-In Notification System has been activated.

Date _____ Time _____ Initials (Security) _____

3. Retrieve the ERO response report from the FAX machine in the copier room on the second floor of the Administration Building and provide to DCO/TSC Coordinator.

II. ALTERNATE COMMUNICATOR NOTIFICATION

A. If directed by the SS/PED to contact an Alternate Communicator to report to the Control Room, do the following:

1. Refer to Appendix O of the Emergency Call-In List, and call individuals in the order of priority listed.
2. Provide the following message to the first individual contacted:

"VY is in a/an [Select one from below]:

- Unusual Event
- Unusual Event Terminated
- Alert
- Site Area Emergency
- General Emergency

Please report to the Control Room as an Alternate Communicator".

Date _____ Time _____ Initials _____
(Security)

III. AUGMENTATION TESTS/DRILL

A. Weekly Pager Functional Test

1. At the time specified in the Security memo, "Emergency Call-In List", the Security Shift Supervisor (SSS) shall activate the VY Pager System as follows:
 - a. Dial 9- [REDACTED]
 - b. After hearing the verbal prompt, dial in password 5787.

NOTE

A display of "888" on a pager notifies the pager holder of a test of the Vermont Yankee Emergency Call-In Method.

- c. After hearing the verbal prompt, press "888" and hang up.
 - d. If indications are received that the group paging capability is out of service, implement emergency paging company notification specified in Section IV.
2. SSS shall verify with the Control Room the DCO of record.

3. SSS shall initiate an individual pager activation for the DCO.

NOTE

XXX-XXXX is the seven digit pager number for the DCO of record.

- a. Dial 9-XXX-XXXX.
 - b. After hearing the verbal prompt, press 999* [REDACTED] and hang up.
4. SSS shall implement the following for DCO activities:
 - a. IF the DCO fails to respond within approximately 30 minutes, THEN attempt to contact the DCO via commercial telephone system.
 - b. IF the DCO is successfully contacted, THEN proceed to step III.A.5.
 - c. IF unable to make contact within one hour, THEN immediately notify the Operations Shift Supervisor and generate an Event Report.
 5. Upon completion of the system activation, the SSS completes the applicable section of VYOPF 3531.01, "Weekly Pager Functional Test".
 6. Upon receiving the page, the Duty On Call Officer (DCO) contacts the SSS and provides the information required by VYOPF 3531.01. VYOPF 3531.01 is then signed and routed to the Emergency Plan Coordinator for completion.

NOTE

The Emergency Plan Coordinator obtains the information required by the "Additional Pager Holder" section of VYOPF 3531.01.

7. In the event the Security Shift Supervisor (SSS) or the DCO pager does not respond to the weekly functional test, they should perform a self test of their individual pager by calling in a test message to their own pager telephone number. If no response to this self test is received, the pager holder should make this known to the Emergency Plan Coordinator.

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NOTES

- The SSS should make note of failure of his and/or the DCO's pager in the Comment Section of VYOPF 3531.01.
- Acceptance criteria for the Weekly Pager Functional Test is the display of "888" on the DCO's, additional pager holder's, and the Security Shift Supervisor's pagers.

B. Annual Communications Drill

1. At the direction of the Emergency Plan Coordinator (EPC), the Security Shift Supervisor (SSS) shall activate the VY Emergency Call-In notification system as follows:
 - a. Contact the Community Alert Network (CAN) Operator at 9-1-800-██████████.
 - b. If you are connected to the CAN Hotline recording, do the following, otherwise go to Step 1.c:
 - 1) Provide the following message when requested:

"This is _____, the Security Shift Supervisor at Vermont Yankee.

My password is _____.

My callback number is _____."
 - 2) Proceed to Step 1.c when CAN callback is received.
 - c. When contact is made with the CAN Operator, implement the following steps:
 - 1) Report the following to the CAN Operator:

"This is _____, the Security Shift Supervisor at Vermont Yankee.

(Pause approx. 5 seconds)

My password is _____.

(Pause approx. 5 seconds)

My callback number is _____.

- 2) The CAN Operator will verify that you have activation authorization (approx. 30 seconds), and will then ask you for the **Event Type**. State the following:

"The Event Type is a Test"

- 3) The CAN Operator will then tell you which of the following 800 telephone numbers should be used for pager holder call-backs:

____ [REDACTED]

____ [REDACTED]

____ **Other:** _____ - _____

- 4) Record the following:

Date _____ Time _____ Person Contacted _____

and hang up.

Initials (Security) _____

- d. Activate the VY Pager System as follows:

- 1) Dial 9- [REDACTED].
- 2) After hearing the verbal prompt, dial in password 5787.

NOTE

XXX XXXX is the 7-digit pager holder call-back telephone no. determined in the previous step.

- 3) After hearing the verbal prompt, press the following buttons:

000 XXX XXXX

- 4) Hang up.

- e. If a CAN callback to confirm successful activation is not received within 5 minutes, call the CAN Operator at 9-1-800- [REDACTED] to determine status.

2. Retrieve the test report from the FAX machine on the second floor of the Administration Building and forward to the Emergency Plan Coordinator.

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NOTE

Acceptance criteria for the Annual Communications Drill shall be satisfying the requirements of NUREG 0654, Table B-1.

IV. PAGING COMPANY NOTIFICATIONS OF GROUP PAGING CAPABILITY OUT OF SERVICE

A. If indications have been received that the group paging capability is out of service, the Security Shift Supervisor (SSS) shall call the paging company emergency number for emergency service, as follows:

1. Dial 1-800-██████████.
2. State the following message: This is _____ of Vermont Yankee Nuclear Power Station in Vernon, Vermont. Our group paging capability is out of service. Please page the on-call person immediately and have them call 802-██████████ as soon as possible", and hang up.

Date _____ Time _____ Initials _____
(SSS)

3. Return to the next step in the procedure from where you exited to Section IV.

B. If indications have been received that the group paging capability is out of service, and the Security Shift Supervisor (SSS) is unsuccessful in contacting the paging company in Step IV.A, the SSS shall do the following:

1. Dial 1-802-██████████.
2. State the following message:
"This message is for the on-call person." This is _____ with the Vermont Yankee Nuclear Power Station in Vernon, Vermont. Our group paging capability is out of service. Please call me at 802-██████████ as soon as possible", and hang up.

Date _____ Time _____ Initials _____
(SSS)

3. Return to the next step in the procedure from where you exited to Section IV.

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V. ALTERNATE EMERGENCY CALL-IN METHOD

- A. Upon receiving indications that the Emergency Call-In Method failed to activate, the respective alternate method shall be performed as follows:

NOTE

Step V.A.1 and V.A.2 shall be initiated concurrently.

1. Activate the VY Pager System as follows:
 - a. Dial 9[REDACTED].
 - b. After hearing the verbal prompt, dial in password 5787.

NOTES

- A display of "111", "222", "333", or "444" on a pager, notifies the pager holder of the designated Emergency Classification. Pager holder should call the plant immediately.
- A display of "111" is used for Unusual Event (Terminated).

- c. After hearing the verbal prompt, press the buttons listed below for the appropriate Emergency Classification and then hang up:

<u>EMERGENCY CLASSIFICATION</u>		<u>BUTTONS PRESSED</u>
Unusual Event	-	111
Alert	-	222
Site Area	-	333
General	-	444

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d. When personnel call in, state the following message for the appropriate emergency classification:

1) For Unusual Event or Unusual Event Terminated:

"Vermont Yankee has declared an [Select one from below]:

Unusual Event

Unusual Event Terminated

DCO report to the plant; all others please stand by."

(Repeat)

"Vermont Yankee has declared an [Select one from below]:

Unusual Event

Unusual Event Terminated

DCO report to the plant; all others please stand by."

Record the time the pager holder, or alternate, calls back in the "Respond Time" column of the pager Holder Call-In List.

Date _____ Time _____ Initials _____
(Security)

2) For Alert (or higher classification):

"Vermont Yankee has declared a/an [Select one from below]:

Alert

Site Area Emergency

General Emergency

(Repeat)

"Vermont Yankee has declared a/an [Select one from below]:

- Alert
- Site Area Emergency
- General Emergency

Please initiate your department call-in per your department appendix in the Emergency Call-In List. Instruct personnel to report to their Emergency Response Facilities. Please report to your Emergency Response Facility as soon as possible."

Date _____ Time _____ Initials _____
(Security)

- e. If indications are received that the group paging capability is out of service, implement emergency paging company notification specified in Section IV.

NOTE

Begin manual telephone call-in when a telephone line becomes available from personnel calling the plant in response to pager activation. The DCO should be the first person contacted.

- 2. Activate the manual telephone call-in as follows:

NOTE

If a pager holder or designated alternate has already called or reported to the plant, they do not have to be called.

- a. Call each pager holder (or designated alternate(s)) listed in Appendix A of the Emergency Call-In List.

b. State the following message for the appropriate emergency classification:

1) For Unusual Event or Unusual Event Terminated:

"Vermont Yankee has declared an [Select one from below]:

Unusual Event

Unusual Event Terminated

DCO report to the plant; all others please stand by."

(Repeat)

"Vermont Yankee has declared an [Select one from below]:

Unusual Event

Unusual Event Terminated

DCO report to the plant; all others please stand by."

Date_____ Time_____ Initials_____ (Security)

2) For Alert (or higher classification):

"Vermont Yankee has declared a/an [Select one from below]:

Alert

Site Area Emergency

General Emergency

(Repeat)

"Vermont Yankee has declared a/an [Select one from below]:

Alert

Site Area Emergency

General Emergency

Please initiate your department call-in per your department appendix in the Emergency Call-In List. Instruct personnel to report to their Emergency Response Facilities. Please report to your Emergency Response Facility as soon as possible."

Date_____ Time_____ Initials_____ (Security)

3. Notify the Shift Supervisor/Plant Emergency Director (SS/PED) after the VY Pager System has been activated.

Date _____ Time _____ Initials _____
(Security)

FINAL CONDITIONS

1. This completed working procedure, along with accompanying documentation, should be returned to the Emergency Plan Coordinator.

Completed By _____ Date _____
Security (Print/Sign)

Approved By _____ Date _____
Emergency Plan Coordinator (Print/Sign)

2. The Emergency Plan Coordinator should ensure that documentation is retained in accordance with AP 6807.

WEEKLY PAGER FUNCTIONAL TEST

Pager System Activation by _____
Security Time Date

Security Shift Supervisor's Name _____

1. Was your pager turned on? _____ Time of test _____

2. Exact location at the time of test? _____

3. Did you receive the tone? _____ Message _____

4. If you received the tone only, did you call the Plant to determine Plant status and reason for pager system activation?

5. Comments: _____

DCO Name _____

1. Was your pager turned on? _____ Time of test _____

2. Exact location at the time of test? _____

3. Did you receive the tone? _____ Message _____

4. If you received the tone only, did you call the Plant to determine Plant status and reason for pager system activation?

5. Comments: _____

Additional Pager Holder Name _____

1. Was your pager turned on? _____ Time of test _____

2. Exact location at the time of test? _____

3. Did you receive the tone? _____ Message _____

4. If you received the tone only, did you call the Plant to determine Plant status and reason for pager system activation?

5. Comments: _____

Approved By: _____ /
Emergency Plan Coordinator (Print/Sign) Date

VERMONT YANKEE NUCLEAR POWER STATION

ADMINISTRATIVE PROCEDURE

AP 3532

REVISION 9

EMERGENCY PREPAREDNESS ORGANIZATION

USE CLASSIFICATION: **INFORMATION**

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VYAPF 3532.01 10 CFR 50.54(q) Evaluation Checklist

1.0 PURPOSE, SCOPE, AND DISCUSSION

1.1 Purpose

The purpose of this procedure is to identify the organization and responsibilities for maintenance of the emergency preparedness program.

1.2 Scope

This procedure is applicable to Vermont Yankee Emergency Preparedness.

1.3 Discussion

Due to the total Vermont Yankee involvement required to maintain emergency preparedness and to implement the Emergency Plan (EP) in response to a plant emergency, the roles of the various elements of the organization are defined in this procedure.

2.0 DEFINITIONS

2.1 None

3.0 PRIMARY RESPONSIBILITIES

3.1 As detailed in the procedure.

4.0 PROCEDURE

4.1 General

The Vermont Yankee Emergency Planning group consists of four positions:

- 4.1.1 Emergency Plan Supervisor - responsible for the development and revision of emergency plans and the coordination of these plans with other response organizations; additionally responsible for the continued assessment and reporting of the state of emergency preparedness for Vermont Yankee; assessment includes those items for which the licensee has responsibility in NUREG 0654 and the Code of Federal Regulations.
- 4.1.2 Emergency Plan Coordinator - responsible and accountable for providing assistance in the development, administration, maintenance and adequacy of the Emergency Preparedness Program at Vermont Yankee.
- 4.1.3 Emergency Planner - Drills & Exercises - overall responsibility for developing and maintaining the Emergency Drill and Exercise Program for Vermont Yankee; this includes the development, training coordination of task specific and annual drills and exercises with Company, State, Local and Federal response organizations.
- 4.1.4 Emergency Planner - Offsite Coordinator - overall responsibility for developing and maintaining the Offsite Emergency Planning Program for Vermont Yankee; this includes coordinating Vermont Yankee Programs with State, Local and Federal response agencies in accordance with applicable regulations.

All departments of the Vermont Yankee organization are responsible for maintaining a level of readiness to implement their responsibilities in the Emergency Plan.

4.2 Director of Safety & Regulatory Affairs

The Director of Safety & Regulatory Affairs acts as the Responsible Procedure Owner, in accordance with AP 0095, for the Emergency Plan Implementing Procedures.

4.3 Emergency Plan Supervisor (EPS)

The broad responsibilities of the EPS include:

4.3.1 Review: The VY Emergency Plan is reviewed annually and revised as required to maintain the Plan in compliance with regulations and to ensure the Plan assigns responsibilities and provides for actions necessary to ensure effective response in event of a radiological emergency at Vermont Yankee.

4.3.2 Assessment: The EPS is aware of the state of emergency preparedness and ensures that the various elements of the VY organization including the plant staff, communications, training department, and other members of the staff as assigned are aware of any areas of reduced preparedness for which they are responsible. The EPS monitors the resolution of any identified deficiencies in the emergency preparedness program. The scope of this assessment function includes:

- a) participation in audits of the emergency preparedness program,
- b) participation in inspections, drills, and exercises evaluating the emergency preparedness program,
- c) review of and formal concurrence with procedures and revisions to procedures required by the Vermont Yankee Emergency Plan,
- d) review of the results of surveillance tests applicable to the emergency preparedness program,
- e) concurrence with commitments (or the withdrawal of commitments) to outside organizations related to the emergency preparedness program,
- f) review and approve (in conjunction with the Technical Training Supervisor) training programs and materials required by the emergency preparedness program,
- g) formally maintain, report status, and ensure resolution of emergency preparedness open action items,
- h) assessment of the assignment and training of personnel to implement the emergency response program.

4.3.3 Liaison: The EPS has the primary responsibility for maintaining the necessary liaison with organizations outside Vermont Yankee as required to meet license requirements under regulations. This includes the NRC and FEMA.

4.3.4 Direct Responsibility: The EPS is directly responsible for the implementation of the following elements of the Emergency Plan:

- a) Licensee responsibilities related to the maintenance of the Public Notification System (sirens, weather alert receivers, emergency broadcasting stations) for the EPZ.
- b) Licensee responsibilities related to the maintenance of the Nuclear Alert System (orange phone) which is used to initially notify the State Emergency Preparedness organizations of an emergency.
- c) Scheduling and coordination of audits, inspections, drills and exercises of the emergency preparedness program as outlined in OP 3505.
- d) Ensure that the emergency preparedness program meets the licensee responsibility requirements of the Code of Federal Regulations 10 CFR 50, applicable implementing documents (e.g., NUREG's, NRC IE Information Notices), and commitments to the NRC. Outstanding actions to meet these requirements will be included in the commitment listing maintained in accordance with AP 0028 with the responsible department identified.
- e) Ensure that all the Emergency Plan Implementing Procedures (EPIPs) are mutually consistent, are consistent with interfacing Local, State, and Federal procedures, and properly implement the VY Emergency Plan. Revisions to EPIPs required for these reasons are identified by the EPS and entered into the Commitment Status List maintained in accordance with AP 0028.
- f) Maintain the EPIPs to ensure the EPIPs effectively perform the stated purpose of the procedure. EPS is responsible for ensuring that these procedures are technically correct, are compatible with the capabilities of the equipment and personnel assigned to implement these procedures, and that any action items applicable to these procedures identified on the Commitment Status List maintained in accordance with AP 0028 are satisfactorily resolved.
- g) Ensure that 10 CFR 50.54(q) evaluations are done on proposed changes to the Emergency Plan, all Emergency Plan Implementing Procedures (EPIPs), and any other document which may warrant this evaluation, and findings are documented on VYAPF 3532.01, "10 CFR 50.54(q) Evaluation Checklist." [INS9324EXT1]
- h) Ensure that 10 CFR 50.54(q) evaluations are done on proposed Department Instructions on any of the EPIPS, and findings are documented on VYAPF 3532.01.
- i) Ensure that Letters of Agreement with off-site agencies are evaluated annually to determine their validity and, if necessary, updated.
- j) Ensure that the Emergency Assistance Personnel List (EAPL) is updated quarterly.

- k) Assist the Plant Manager (or designee) in performance of on-site emergency preparedness work. This effort consists of a commitment to on-site EP work as deemed appropriate by the Plant Manager, Director of Safety & Reg. Affairs, and EPS. The EPS additionally provides for any outside assistance requested to perform emergency preparedness work at the plant.
- l) Ensure that all comments or recommendations are documented and resolved in accordance with OP 3505. Action items are incorporated into the Commitment Status List which is maintained in accordance with AP 0028.
- m) Ensure that a review of paperwork associated with a classified emergency event is initiated the next working day following the termination of the event, to ensure that procedural requirements have been satisfied, and if not, conduct an appropriate investigation of the issue. [UND93054EXT3]

4.4 Plant Manager

The Plant Manager is responsible for the readiness of the plant staff and contractors to implement the emergency response procedures including the following:

4.4.1 Facilities: Maintenance of the on-site emergency response facilities (TSC and OSC) and all emergency response equipment necessary to implement the emergency procedures at the plant. Additionally, the Plant Manager is responsible for all radiological monitoring and protection equipment.

4.4.2 Surveillance Tests: The Plant Manager is responsible for the conduct of all Surveillance Tests except for the following (which are the responsibility of the EPS):

- 1009 - Weekly Beeper Functional Test
- 2008 - NMR Communications Siren/Generator Maintenance Report
- 3036 - Emergency Assistance Personnel List Update
- 3102 - ERF Communications Directory Update
- 3116 - NMC Equipment Surveillance
- 3130 - EOF Fire Brigade and Medical Team Lists Updates
- 3145 - Emergency Call-In Status Update
- 3188 - DEA Telephone Update/Issuance
- 3254 - CAN Notification Process Refresher
- 3262 - Pager Tel. No./Cap Code Assignments Review
- 4000 - Power Fail Phone System Surveillance
- 4019 - EOF UHF Radio Operability Check
- 4080 - Health Physics Drill
- 5020 - NMR Communications Siren Testing Program Summary Report
- 5022 - Emergency Assistance Personnel List Assignments Audit
- 5025 - News Media Training
- 5032 - DEA Telephone Directory Tel. No. Verification
- 5034 - News Media Center Personnel Training
- 5037 - State/Local Emergency (EAL) Personnel Training
- 5046 - VY Emergency Public Info Program E-Plan Poster
- 5055 - VY Emergency Public Info Program 3-States Calendar
- 5056 - Emergency Preparedness Exercise
- 5060 - VY Emergency Public Info Program Motel Brochure
- 5066 - Emergency Plan Review

- 5074 - Medical Drill
- 5078 - Communications Test
- 5079 - Radiological Monitoring Drill
- 5080 - State EOC and Field Assessment Teams Communications Test
- 5092 - States and Local Transmittal/50.54(t) Audit Results
- 5094 - EPI Material Accuracy Verification
- 5134 - Annual Calendar Distribution Surveillance
- 5146 - Local Fire Department Training
- 5147 - Off-Site Participation Fire Drill
- 5414 - NMR Communications VY Program Surveillance

- 4.4.3 Open Items: Resolution of open items from inspections, exercises, drills, or reviews assigned to the plant.
- 4.4.4 Assignment and Training of Personnel: Ensure that sufficient personnel are assigned to plant emergency response positions on shift, 30 minute shift augmentation, 60 minute shift augmentation, and the full response organization for positions to be manned by plant staff personnel. The Plant Manager is also responsible to ensure that plant personnel required to augment the EOF staff are assigned as determined by the VP, Operations. The Plant Manager is responsible to ensure that the personnel receive the necessary training prior to their assignment and maintain this training.
- 4.4.5 Inspections, Drills and Exercises: Provides the required support for the planning, preparation, conduct, and evaluation activities as specified in the Emergency Plan Implementing Procedures.
- 4.4.6 Recall of Plant Staff: Recall of plant emergency response personnel to work as required by the emergency plan and other regulations and commitments as outlined in OP 3531.

4.5 Training Manager

The Training Manager (TM) is responsible for the development of the training program required by the Emergency Plan. The following emergency preparedness functions are the responsibility of the Training Manager.

- 4.5.1 Training Program: Development of the training materials necessary to define and conduct EP training for VY emergency response personnel.
- 4.5.2 Schedule and Conduct Training: Schedule required training of persons identified by the VP, Operations, the Plant Manager, the EPS, and the Employee Services & Facilities Supervisor, and to ensure that training is conducted for designated personnel. Additionally, the Training Manager is responsible for the training for these individuals on any major revisions in their duties in a timely manner.
- 4.5.3 Documentation of Training: Maintenance of records of completed training.
- 4.5.4 Training of Non-VY EP Persons: Ensure that training is provided to non-VY EP persons consistent with OP 3712, "Emergency Plan Training", and records of this type of training are retained.

4.5.5 Procedures: Responsible for procedure OP 3712.

4.5.6 Assignment of Personnel: Assignment of Training department personnel, as directed by the VP, Operations, to support the emergency response organization.

4.6 Director of Public Affairs

The Director of Public Affairs is responsible for the implementation of the public information portions of the Emergency Plan. The following emergency preparedness functions are the responsibility of the Director of Public Affairs:

4.6.1 Facilities: ensures the readiness of the News Media Center at all times. This includes quarterly equipment surveillance and verification and update of telephone numbers.

4.6.2 Documents: responsible for development, maintenance and implementation of the News Media Center Implementing Guidelines.

4.6.3 Training of Personnel: responsible for ensuring all VY staff assigned to the News Media Center during an emergency or exercise are trained annually.

4.6.4 Training of Non-VY Personnel: coordinates annual media training on emergency planning.

4.7 Employee Services & Facilities Supervisor

The Employee Services & Facilities Supervisor is responsible for service equipment (e.g., phones, copiers, FAX machines) required to support the operations of the EOF/RC and News Media Center.

4.8 Emergency Planner - Offsite Coordinator

The Emergency Planner is responsible for the development and coordination of off-site emergency planning activities. The Emergency Planner coordinates VY efforts in support of state and local emergency response organizations. Additionally, the Emergency Planner is responsible for the development and maintenance of the Vermont Yankee Emergency public information program, and the dissemination of public information on emergency preparedness.

Specifically, the Emergency Planner is responsible for the following:

4.8.1 Training of Non-VY Personnel: Coordinate training of State and/or Local government agencies per request of State, and the Vernon fire department and other Southwestern Fire Mutual Aid District fire departments within the VY 10 mile EPZ.

5.0 REFERENCES AND COMMITMENTS

5.1 Technical Specifications and Site Documents

5.1.1 VY Emergency Plan

5.2 Codes, Standards, and Regulations

5.2.1 NUREG 0654, Criteria for Preparation and Evaluation of Radiological Emergency Response and Preparedness in Support of Nuclear Power Plants

5.2.2 Code of Federal Regulations (10 CFR 50.47 and 10 CFR 50 Appendix E)

5.3 Commitments

5.3.1 INS9324EXT1

5.3.2 UND93054EXT3

5.4 Supplemental References

5.4.1 Public Affairs Department Guideline No. 4, "News Media Center Implementation"

5.4.2 AP 0028, Commitment Tracking

5.4.3 AP 0095, Plant Procedures

5.4.4 AP 3125, Emergency Plan Classification and Action Level Scheme

5.4.5 OP 3500, Unusual Event

5.4.6 OP 3501, Alert

5.4.7 OP 3502, Site Area Emergency

5.4.8 OP 3503, General Emergency

5.4.9 OP 3504, Emergency Communications

5.4.10 OP 3505, Emergency Preparedness Exercises and Drills

5.4.11 OP 3506, Emergency Equipment Readiness Check

5.4.12 OP 3507, Emergency Radiation Exposure Control

5.4.13 OP 3508, On-Site Medical Emergency Procedure

5.4.14 OP 3509, Environmental Sample Collection During an Emergency

5.4.15 OP 3510, Off-Site and Site Boundary Monitoring

5.4.16 OP 3511, Off-Site Protective Action Recommendations

5.4.17 OP 3513, Evaluation of Off-Site Radiological Conditions

5.4.18 OP 3524, Emergency Actions to Ensure Initial Accountability and Security Response

5.4.19 OP 3525, Radiological Coordination

5.4.20 OP 3531, Emergency Call-In Method

5.4.21 OP 3533, Post Accident Sampling of Reactor Coolant

5.4.22 OP 3534, Post Accident Sampling of Plant Stack Gaseous Releases

5.4.23 OP 3535, Post Accident Sampling and Analysis of Primary Containment

5.4.24 OP 3536, In-Plant Air Sample Analysis with Abnormal Conditions

5.4.25 OP 3712, Emergency Plan Training

5.4.26 AP 6807, Collection, Temporary Storage and Retrieval of QA Records

6.0 RECORDS RETENTION

6.1 Retain VYAPF 3532.01 in accordance with AP 6807.

10 CFR 50.54(q) Evaluation Checklist

List of Emergency Plan Section(s)/Emergency Plan Implementing Procedure(s) or any other document to be evaluated. (Include Title and Revision No.):

A. Screening Evaluation

Based on a review of the following questions, determine if the change has the potential to affect our ability to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50.

A "YES" answer to any part of the questions requires that a written evaluation be done to determine whether the effectiveness of the Emergency Plan was decreased as specified in Section B of this checklist.

A "NO" answer to all questions requires no written evaluation as specified in Section B of this checklist.

1. Would the proposed change affect our ability to meet the following standards of 10 CFR 50.47(b):

- | | | |
|---|-----|----|
| (1) Assignment of Emergency Response Organization responsibilities | YES | NO |
| (2) Assignment of on-shift Emergency Response Organization personnel | YES | NO |
| (3) Arrangements for Emergency Response Support and Resources | YES | NO |
| (4) Emergency Classification and Action levels, including facility system and effluent parameters | YES | NO |
| (5) Notification Methods and Procedures | YES | NO |
| (6) Emergency Communications among principal response organizations and the public | YES | NO |
| (7) Public Education and Information | YES | NO |
| (8) Adequacy of Emergency Facilities and Equipment | YES | NO |
| (9) Adequacy of Accident Assessment methods, systems and equipment | YES | NO |
| (10) Plume exposure pathway EPZ protective actions | YES | NO |
| (11) Emergency Worker Radiological Exposure Control | YES | NO |
| (12) Medical Services for contaminated injured individuals | YES | NO |
| (13) Recovery and Reentry Plans | YES | NO |
| (14) Emergency response periodic drills and exercises | YES | NO |
| (15) Radiological Emergency Response Training | YES | NO |
| (16) Plan development, review and distribution | YES | NO |

10 CFR 50.54(q) Evaluation Checklist (Continued)

2. Would the change affect our ability to meet the following requirements of Appendix E to 10 CFR 50.

- | | | |
|---|-----|----|
| (1) Section IV. A - Organization | YES | NO |
| (2) Section IV. B - Assessment Actions | YES | NO |
| (3) Section IV. C - Activation of Emergency Organizations | YES | NO |
| (4) Section IV. D - Notification Procedures | YES | NO |
| (5) Section IV. E - Emergency Facilities and Equipment | YES | NO |
| (6) Section IV. F - Training | YES | NO |
| (7) Section IV. G - Maintaining Emergency Preparedness | YES | NO |
| (8) Section IV. H - Recovery | YES | NO |

B. Effectiveness Determination

For each applicable (i.e., a "yes" answer specified) standard to 10 CFR 50.47(b) and Appendix E to 10 CFR 50 identified from Section A above, complete the evaluation form below to determine whether the change decreases the effectiveness of the Emergency Plan and whether it continues to meet the stated applicable standard or requirement.

A facsimile of the evaluation form may be used as needed and attached to this checklist.

For applicable item 10 CFR 50 _____ of Section A above, this change (DOES/DOES NOT) decrease the effectiveness of the Emergency Plan and (DOES/DOES NOT) continue to meet the stated applicable standard or requirement.

BASIS FOR ANSWER: _____

10 CFR 50.54(q) Evaluation Checklist (Continued)

C. Conclusion (Fill out appropriate information)

- The changes made do not decrease the effectiveness of the Emergency Plan and continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50.
- The changes made do decrease the effectiveness of the Emergency Plan and decrease our ability to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50. The following course of action is recommended:
 - Revise proposed changes to meet applicable standards and requirements.
 - Cancel the proposed changes.
 - Process proposed changes for NRC approval prior to implementation in accordance with 10 CFR 50.54(q).

Additional Comments:

Prepared By: _____ Date: _____
(Print/Sign)

Reviewed By: _____ Date: _____
(Emergency Plan Coordinator) (Print/Sign)