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August 20, 2002  
BVY 02-66

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

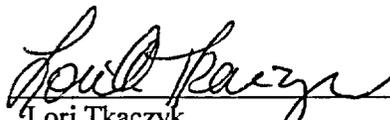
Subject: Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
Vermont Yankee Emergency Plan Implementing Procedure Changes

In accordance with 10 CFR 50.54(q), enclosed are the latest changes to the Vermont Yankee Emergency Plan Implementing Procedures, OP 3524, Rev. 19, LPC#1 and OP 3541, Rev. 1, LPC#1, the change memos and the 10 CFR 50.54(q) Evaluation Checklists. These changes were determined to not need prior NRC review and approval.

If you have any questions, please contact Audra Williams, Emergency Planning Coordinator, in our Brattleboro office at (802) 258-4177.

Sincerely,

ENTERGY NUCLEAR NORTHEAST  
VERMONT YANKEE

  
Lori Tkaczyk  
Emergency Planning Manager

Attachments

cc: USNRC Region 1 Administrator  
USNRC Resident Inspector – VYNPS  
USNRC Project Manager – VYNPS  
David M. Silk, Senior Emergency Preparedness Specialist,  
USNRC Region 1  
Vermont Department of Public Service

A045

# Eplan Implementing Plant Procedures

To: Eplan Implementing Procedure Controlled Set Holders

From: Diane McCue *D. McCue*

Date: 08/19/02

Re: VY EPlan Implementing Procedure Change #207, Instruction Sheet

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LPC's: The following LPC should be incorporated into the appropriate procedures:

<u>Proc/Rev #</u>	<u>LPC #</u>	<u>Procedure Title</u>
OP 3524/19	1	Emergency Actions to Ensure Accountability & Security Response
OP 3541/1	1	Activation of the TSC

VERMONT YANKEE NUCLEAR POWER STATION

**OPERATING PROCEDURE**

OP 3524

REVISION 19

**EMERGENCY ACTIONS TO ENSURE INITIAL ACCOUNTABILITY  
AND SECURITY RESPONSE**

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages
1	08/14/02	VYOPF 3524.02 Pg 1 of 3

**Implementation Statement: N/A**

Issue Date: 06/06/02

INITIAL SITE ACCOUNTABILITY CHECK-IN FORM

FOR TECHNICAL SUPPORT CENTER RESPONSE PERSONNEL

DATE: \_\_\_\_\_

<u>POSITION</u>	<u>GATEHOUSE SLOT NO.</u>	<u>PLEASE PRINT NAME CLEARLY</u>	<u>DEPT.</u>
TECHNICAL SUPPORT CENTER COORDINATOR	_____	_____	_____
SECURITY COORDINATOR	_____	_____	_____
MAINTENANCE COORDINATOR	_____	_____	_____
ENGINEERING COORDINATOR	_____	_____	_____
REACTOR ENGINEERING COORDINATOR	_____	_____	_____
OPERATIONS COORDINATOR	_____	_____	_____
RADIATION PROTECTION COORDINATOR	_____	_____	_____
CHEMISTRY COORDINATOR	_____	_____	_____
G.E. ENGINEER (WHEN AVAILABLE)	_____	_____	_____
DOC. & ADMIN. SERVICES COORDINATOR	_____	_____	_____
DECISION MAKER	_____	_____	_____

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.):

OP 3524, Rev. 19, LPC #1,  
Emergency Actions to Ensure Accountability and Security Response

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

10 CFR 50.54(g) Evaluation Checklist (Continued)

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

- |   |     |                                     |
|---|-----|-------------------------------------|
| (1) Section IV. A - Organization                          | YES | <input checked="" type="radio"/> NO |
| (2) Section IV. B - Assessment Actions                    | YES | <input checked="" type="radio"/> NO |
| (3) Section IV. C - Activation of Emergency Organizations | YES | <input checked="" type="radio"/> NO |
| (4) Section IV. D - Notification Procedures               | YES | <input checked="" type="radio"/> NO |
| (5) Section IV. E - Emergency Facilities and Equipment    | YES | <input checked="" type="radio"/> NO |
| (6) Section IV. F - Training                              | YES | <input checked="" type="radio"/> NO |
| (7) Section IV. G - Maintaining Emergency Preparedness    | YES | <input checked="" type="radio"/> NO |
| (8) Section IV. H - Recovery                              | YES | <input checked="" type="radio"/> 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 N/A 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:

This change removes the Technical Support Services Coord. position from the Initial Site Accountability Check-In Form. This change only removes the specific signature line for this position during accountability, not the position itself. The removal of this position was done during the E-Plan Team Implementation and was previously subject to 10CFR50.54(g). This change does not decrease the effectiveness and continues to meet the requirements.

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).

D. Impact on Other Documents (TRM, Tech Specs)

Keywords used in search: \_\_\_\_\_

- This change does not affect any other documents.
- This change does affect other documents.

Document(s) affected: \_\_\_\_\_

Section(s) affected: \_\_\_\_\_

E. Impact on the Updated FSAR

Use AP 6036 to determine if the proposed E-Plan change modifies existing UFSAR information or requires the addition of new UFSAR information and initiate UFSAR change(s) as required.

Keywords used in UFSAR search: \_\_\_\_\_

Additional Comments:

Prepared By: Audra Williams *Audra Williams* Date: 8/8/02  
(Print/Sign)

Reviewed By: Lori A. Tkaczyk *Lori A. Tkaczyk* Date: 8/13/02  
(Emergency Plan Coordinator) (Print/Sign)

VERMONT YANKEE NUCLEAR POWER STATION

**OPERATING PROCEDURE**

OP 3541

REVISION 1

**ACTIVATION OF THE TECHNICAL SUPPORT CENTER (TSC)**

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages
1	08/14/02	5 of 7; Table 2 Pg 1 of 1

**Implementation Statement: N/A**

Issue Date: 06/06/02

**TABLE 2**  
**EQUIPMENT LOCATIONS**  
**(PER OP 3504)**

ITEM

LOCATION

LPC #1

Area map/dispersion wheel, UHF radio,  
Nomogram

In the Support Area outside of the TSC

EP Cabinets

In kitchen across from TSC, contains equipment  
& FTS phones for use by the TSC

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.):

OP 3541, Rev. 1, LPC#1, Activation of the TSC

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

10 CFR 50.54(q) Evaluation Checklist (Continued)

2. Could 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 ~~47(b)~~ 47(b)(8) and App E Sect. IV.E (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:

The change is to identify the new location of the Emergency Planning Supply Cabinets. No items were removed and all items on the inventory are still contained within the cabinets. This change does not decrease the effectiveness and does continue to meet the requirements.

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).

D. Impact on Other Documents (TRM, Tech Specs)

Keywords used in search: \_\_\_\_\_

- This change does not affect any other documents.
- This change does affect other documents.

Document(s) affected: \_\_\_\_\_

Section(s) affected: \_\_\_\_\_

E. Impact on the Updated FSAR

Use AP 6036 to determine if the proposed E-Plan change modifies existing UFSAR information or requires the addition of new UFSAR information and initiate UFSAR change(s) as required.

Keywords used in UFSAR search: \_\_\_\_\_

Additional Comments:

Prepared By: Audra Williams *Audra Williams* Date: 8/8/02  
(Print/Sign)

Reviewed By: Lori A. Kaczyk *Lori A. Kaczyk* Date: 8/13/02  
(Emergency Plan Coordinator) (Print/Sign)

PROCEDURE

NOTES

- Phones, Supplies & Equipment are stored in the EP cabinets in the kitchen across from TSC.
- Steps may be performed concurrently or out of sequence.

Designate person to complete 3541

Name (print): \_\_\_\_\_

Date: \_\_\_\_\_

Time/Date      Initials

- |     |   |               |
|-----|---|---------------|
| 1.0 | Turn on ARMs in the TSC Area. Notify RP Coordinator if ARMs do not appear to be operating properly. | _____ / _____ |
| 2.0 | Check wall mounted phones in TSC for dial tone. (See Figure 4 of OP 3504.)                          | _____ / _____ |
| 3.0 | Setup & check phones in NRC Office area for dial tone. (See Figure 4 of OP 3504)                    | _____ / _____ |
| 4.0 | Arrange chairs and tables per Figure 1.   | _____ / _____ |
| 5.0 | Layout EOP charts and markers against the East wall.  | _____ / _____ |

NOTE

Individuals filling positions on the sign-in board must also sign in on VYOPF 3524.02.

- |      |   |               |
|------|---|---------------|
| 6.0  | Setup sign-in board                                     | _____ / _____ |
| 7.0  | Set out VYOPF 3524.02 sign-in forms.                    | _____ / _____ |
| 8.0  | Setup Plant Parameter Sheets on the West wall           | _____ / _____ |
| 9.0  | Setup headings to the right of Parameter Sheets for:    |               |
|      | 1) Next department head meeting (time)                  |               |
|      | 2) Current TSC Coordinator (name)                       | _____ / _____ |
| 10.0 | Place emergency classification label on the South wall. | _____ / _____ |