



Entergy Nuclear Northeast

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August 26, 2002
BVY 02-68

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 Change

In accordance with 10 CFR 50.54(q), enclosed is the latest change to the Vermont Yankee Emergency Plan Implementing Procedure, AP 3125, Rev. 19, the change memo and the 10 CFR 50.54(q) Evaluation Checklist. 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,

ENERGY NUCLEAR NORTHEAST
VERMONT YANKEE

A handwritten signature in cursive script, appearing to read "Lori Tkaczyk", written over a horizontal line.

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

#54 MZR

**Eplan Implementing
Plant Procedures**

To: Eplan Implementing Procedure Controlled Set Holders

From: Diane McCue *D. McCue*

Date: 08/22/02

Re: VY EPlan Implementing Procedure Change #208, Instruction Sheet

A new Table of Contents is included.

REVISIONS: Please replace the following procedures: -

Proc/Rev #

Procedure Title

AP 3125/19

Emergency Plan Classification & Action Level Scheme

Vermont Yankee Emergency Plan Implementing Procedures

Table of Contents

August 22, 2002

Emergency Plan Classification and Action Level Scheme	AP 3125	Rev. 19	"R"
Emergency Communications	OP 3504	Rev. 34	"R"
Emergency Preparedness Exercises and Drills	OP 3505	Rev. 24	"I"
Emergency Equipment Readiness Check	OP 3506	Rev. 41	"R"
Emergency Radiation Exposure Control	OP 3507	Rev. 29	"R"
On-Site Medical Emergency Procedure	OP 3508	Rev. 23	"R"
Environmental Sample Collection During an Emergency	OP 3509	Rev. 17	"R"
Off-Site and Site Boundary Monitoring	OP 3510	Rev. 26	"R"
Off-Site Protective Action Recommendations	OP 3511	Rev. 11	"R"
Evaluation of Off-Site Radiological Conditions	OP 3513	Rev. 21	"R"
Emergency Actions to Ensure Accountability and Security Response	OP 3524	Rev. 19	"R"
Radiological Coordination	OP 3525	Rev. 9	"R"
Emergency Call-In Method	OP 3531	Rev. 15	"R"
Emergency Preparedness Organization	AP 3532	Rev. 10	"I"
Post Accident Sampling of Reactor Coolant	OP 3533	Rev. 5	"C"
Post Accident Sampling of Plant Stack Gaseous Releases	OP 3534	Rev. 3	"C"
Post Accident Sampling and Analysis of Primary Containment	OP 3535	Rev. 4	"C"
In Plant Air Sample Analysis with Abnormal Condition	OP 3536	Rev. 1	"C"
Control Room Actions During an Emergency	OP 3540	Rev. 1	"R"
Activation of the Technical Support Center	OP 3541	Rev. 1	"R"
Operation of the Technical Support Center	OP 3542	Rev. 1	"R"
Operation of the Operations Support Center	OP 3544	Rev. 2	"R"
Activation of the Emergency Operations Facility/Recovery Center	OP 3545	Rev. 1	"R"
Operation of the Emergency Operations Facility/Recovery Center	OP 3546	Rev. 1	"R"
Security Actions During an Emergency	OP 3547	Rev. 1	"R"
Emergency Plan Training	OP 3712	Rev. 16	"I"

VERMONT YANKEE NUCLEAR POWER STATION

ADMINISTRATIVE PROCEDURE

AP 3125

REVISION 19

EMERGENCY PLAN CLASSIFICATION AND ACTION LEVEL SCHEME

USE CLASSIFICATION: INFORMATION

LPC No.	Effective Date	Affected Pages

Implementation Statement: N/A

Issue Date: 08/22/2002

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1.0 PURPOSE, SCOPE, AND DISCUSSION

1.1. Purpose

The purpose of this procedure is to provide a mechanism for classifying off-normal events and plant conditions into one of the four emergency classifications as described in the Vermont Yankee Nuclear Power Station Emergency Plan.

1.2. Scope

Vermont Yankee personnel are trained so that when they sense that plant operations are off-normal or exceeding administrative controls, they have cause to refer to emergency operating procedures which will subsequently refer them to this procedure if necessary.

1.3. Discussion

This procedure, in chart form, is designed to assign the appropriate emergency class for events which are in progress or have occurred. The Emergency Plan is then implemented on the basis for the classification. The chart does not necessarily list all situations which would require implementation of the Emergency Plan; therefore, any off-normal condition should be evaluated in light of the "General Criteria." The minimum response to any event listed in the chart once it has occurred would be to classify the event at the Unusual Event level and to implement the Emergency Plan accordingly.

The appendix is used by Vermont Yankee personnel to classify an event into one of four classes of Emergency Action Levels:

1. Unusual Event
2. Alert
3. Site Area Emergency
4. General Emergency

2.0 DEFINITIONS

The definitions of Emergency Classifications are:

- 2.1. Alert: Events are in progress or have occurred which involve an actual or potential substantial degradation of plant safety margins which could affect on-site personnel safety, could require off-site impact assessment, but is not likely to require off-site public protective action.
- 2.2. General Emergency: Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guidelines exposure levels off-site for more than the immediate site area.

- 2.3. Site Area Emergency: Events are in progress or have occurred which involve likely or actual major failures of plant functions needed for protection of the public. Any release is not expected to exceed EPA Protective Action Guidelines exposure levels except near the site boundary.
- 2.4. Unusual Event: Events are in progress or have occurred which involve potential degradation of plant safety margins, which are not likely to affect personnel on-site or the public off-site or result in radioactive releases requiring off-site monitoring.
- 2.4.1. Unusual Event (Terminated): Event has occurred and was immediately rectified such that the condition no longer existed by the time of declaration. Further, the event or condition did not affect personnel on-site or the public off-site or result in radioactive releases requiring off-site monitoring.

3.0 PRIMARY RESPONSIBILITIES

- 3.1. The *Operations Duty Shift Manager*, or in his absence from the Control Room, the *Operations Duty Supervisory Control Room Operator* is initially responsible and authority for classifying the level of the emergency.
- 3.2. The *Senior Manager of Vermont Yankee* who assumes the overall supervision of the emergency response organization is responsible for subsequent escalation or de-escalation of the emergency classification.
- 3.2.1. The *Technical Support Center Coordinator* is the designated individual for unusual events.
- 3.2.2. The *Site Recovery Manager* is the designated individual for Alert and higher emergency classifications, upon assumption of this responsibility from the Technical Support Center Coordinator.

4.0 PROCEDURE

- 4.1. Refer to Appendix A and based on the event to be classified, locate the appropriate "Event Categories."
- 4.2. Determine if any of the Emergency Action Levels (EALs) have been reached for any of the four classes of emergency (Unusual Event, Alert, Site Area Emergency, General Emergency).

NOTE

For any EAL reached the minimum classification is Unusual Event (UE). Also, per OP 3540, it is only at the UE level that the emergency may be immediately terminated by the SS/PED.

- 4.3. If multiple EALs have been reached:
 - 4.3.1. Classify the emergency at the highest emergency class for those EALs which exist.
 - 4.3.2. For EALs which have been reached but are no longer present, the emergency must still be classified at the highest emergency class even though the conditions no longer exist.
 - 4.3.3. If other EAL conditions exist which would not require re-classification:
 - 4.3.3.1. provide a timely update to the NRC and the states since these other conditions represent a significant change in the status of the classification,
 - 4.3.3.2. do not make a second EAL declaration for the classification already in existence.
- 4.4. If events are in progress or have occurred and no specific EALs in Appendix A have been reached, but in the opinion of the responsible individual conditions warrant the implementation of the Emergency Plan or re-classification, the individual should classify the event as appropriate (refer to Appendix A, "General Criteria" Event Category).

NOTE

In making the classification determination, the responsible individual should request assistance from any source immediately available (Security, Chemistry, Radiation Protection, I/C, Maintenance, Engineering Support, etc.). Input from these sources must be prompt, informal, and advisory in nature.

- 4.5. Once the classification has been assigned, implementation of the appropriate Emergency Operating Procedure should be initiated with the prompt notifications of off-site authorities performed, consistent with the need for other emergency actions.

- 4.6. Changing conditions may require re-classification. Assess conditions periodically and be prepared to initiate the appropriate change.
- 4.7. Subsequent to entry into an Emergency Action Level (EAL), a second initiating condition does not require a second declaration for the classification already reached. However, it does merit a timely update to the states and the NRC since it is a significant change in the status of the classification.

5.0 REFERENCES AND COMMITMENTS

5.1. Technical Specifications and Site Documents

- 5.1.1. Vermont Yankee Nuclear Power Station Emergency Plan
- 5.1.2. Off-Site Dose Calculation Manual (ODCM)
- 5.1.3. Vermont Yankee Physical Security Plan
- 5.1.4. All Technical Specifications
- 5.1.5. Updated Final Safety Analysis Report (UFSAR)

5.2. Codes, Standards, and Regulations

- 5.2.1. EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents", dated 5/92
- 5.2.2. NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels", Rev. 2, dated January 1992
- 5.2.3. NUMARC, "Questions and Answers - Methodology for Development of Emergency Action Levels, NUMARC/NESP-007 Rev. 2", dated 6/93
- 5.2.4. NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"
- 5.2.5. NUREG-1228, "Source Estimations During Incident Response to Severe Nuclear Power Plant Accidents"
- 5.2.6. USNRC EPPOS No. 1, "Emergency Preparedness Position (EPPOS) on Acceptable Deviations from Appendix 1 of NUREG-0654 Based Upon the Staff's Regulatory Analysis of NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels", dated 6/1/95

5.3. Commitments

- 5.3.1. BVY-2002-015_22, Respond to item B.5.e
- 5.3.2. INS9214OP1, "Revise AP 3125 to address concerns noted in NRC Inspection Report 50-271/92-14 per BVY 92-116"
- 5.3.3. INS9704_01, Address Concern With OP 3127 Requirement To Declare An Unusual Event Based On A Single Operations Indication As Being Overconservative (Seismic, Earthquake)

5.4. Supplemental References

- 5.4.1. Letter, USNRC to VYNPC, "NRC Inspection No. 50-271/95-07", dated 6/12/95
- 5.4.2. Memo, E.C. Porter to Dist., "1989 Emergency Preparedness Exercise - Redundant Classification Declaration", dated 8/10/89
- 5.4.3. Memo, C.D. Thomas to M.J. Marian, "AP 3125, Appendix B, Fission Product Barrier Matrix Technical Basis", dated 3/30/93
- 5.4.4. Memo, J.G. Parillo to S. Miller, "Monitor Indications for Failed Fuel", dated 6/27/95
- 5.4.5. OP 3540, Control Room Actions During an Emergency
- 5.4.6. OP 3541, Activation of the Technical Support Center (TSC)
- 5.4.7. OP 3542, Operation of the Technical Support Center (TSC)
- 5.4.8. OP 3544, Operation of the Operations Support Center (OSC)
- 5.4.9. OP 3545, Activation of the Emergency Operations Facility/Recovery Center (EOF/RC)
- 5.4.10. OP 3546, Operation of the Emergency Operations Facility/Recovery Center (EOF/RC)
- 5.4.11. OP 3547, Security Actions During an Emergency

6.0 FINAL CONDITIONS

- 6.1. None

7.0 ATTACHMENTS

- 7.1. Appendix A Chart of Categories and Events
- 7.2. Appendix B Deleted

**THIS PAGE IS AN
OVERSIZED DRAWING
OR FIGURE,**

**THAT CAN BE VIEWED AT
THE RECORD TITLED:**

**APPENDIX A
AP 3125
REV. 19 VY EALS**

WITHIN THIS PACKAGE

NOTE: Because of this page's large file size, it may be more convenient to copy the file to a local drive and use the Imaging (Wang) viewer, which can be accessed from the Programs/Accessories menu.

D-1

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.):

AP 3125, rev. 19, Emergency Plan Classification and Action Level Scheme and EAL Technical Bases, rev. 4

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 | <input checked="" type="radio"/> YES | 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 | <input checked="" type="radio"/> YES | 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 | <input checked="" type="radio"/> NO |
| (2) Section IV. B - Assessment Actions | <input checked="" type="radio"/> YES | 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 .47(b) 4 & 9 and Appendix E.IV.B 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 50.47(b)4 - changed EAL U-9-a consistent with NRC letter BVY-2002-015 (commitment BVY-2002-015 22) on site specific credible threat. Clarified the bases document for EAL U-9-a and A-9-a consistent with NRC letter BVY-2002-015 and NEI endorsed changes. Clarified bases document for EAL U-5-c for earthquake detection per EPRI guidelines. Clarified bases document for EAL A-7-c, S-7-c and G-7-b on failure to scram based on 10 CFR 50.72 and NUREG-1022, rev. 1 section 3 guidance. 10 CFR 50.47(b)9 - implemented NRC Generic Letter 89-01, relocating programmatic controls of the Radiological Effluent Technical Specifications (RETS) to the Offsite Dose Calculation Manual (ODCM) This included Radiological Effluents and Radiological Environmental Monitoring. Appendix E.IV.B - as above. These changes do not decrease the effectiveness of the Emergency Plan.

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: earthquake, emergency, security, RETS, ODCM

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: earthquake, emergency, security, RETS, ODCM

Additional Comments:

Prepared By:

Christina M. Carty Christina Carty

(Print/Sign)

Date: 6/10/02

Reviewed By:

Lori A. Tkaczyk Loui Tkaczyk
(Emergency Plan Coordinator) (Print/Sign)

Date: 6/10/02