



Entergy Nuclear Northeast
Vermont Yankee
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April 30, 2003
BVY 03-041

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 following Vermont Yankee Emergency Plan Implementing Procedures including the change memos and the 10 CFR 50.54(q) Evaluation Checklists:


OP 3506, Rev. 42, LPC#1
OP 3525, Rev. 10
OP 3712, Rev. 17

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 (no attachments)
David M. Silk, Senior Emergency Preparedness Specialist,
USNRC Region 1
Vermont Department of Public Service

A045

E-Plan Implementing Plant Procedures

To: E-Plan Implementing Procedure Controlled Set Holders
From: Technical Support - DCC - Angela M. Hogan
Date: 04/30/03
Re: Entergy Vermont Yankee Emergency Plan Implementing Procedure Change 216,
Instruction Sheet

A new Table of Contents is included.

LPCs: The following LPC should be incorporated into the appropriate procedures:

<u>Proc/Rev #</u>	<u>LPC #</u>	<u>Procedure Title</u>
OP 3506/42	1	Emergency Equipment Readiness Check

REVISIONS: The following Revs should replace the appropriate procedures:

<u>Proc/Rev #</u>	<u>Procedure Title</u>
OP 3525/10	Radiological Coordination
OP 3712/17	Emergency Plan Training

Vermont Yankee Emergency Plan Implementing Procedures				
Table of Contents				
April 30, 2003				
Title	Number	Revision	LPC #	Use Classification
Emergency Plan Classification and Action Level Scheme	AP 3125	Rev. 19		"Reference"
Emergency Communications	OP 3504	Rev. 36		"Reference"
Emergency Preparedness Exercises and Drills	OP 3505	Rev. 24	1	"Information"
Emergency Equipment Readiness Check	OP 3506	Rev. 42	1	"Reference"
Emergency Radiation Exposure Control	OP 3507	Rev. 30		"Reference"
On-Site Medical Emergency Procedure	OP 3508	Rev. 23		"Reference"
Environmental Sample Collection During an Emergency	OP 3509	Rev. 17		"Reference"
Off-Site and Site Boundary Monitoring	OP 3510	Rev. 27		"Reference"
Off-Site Protective Action Recommendations	OP 3511	Rev. 12		"Reference"
Evaluation of Off-Site Radiological Conditions	OP 3513	Rev. 21		"Reference"
Emergency Actions to Ensure Initial Accountability and Security Response	OP 3524	Rev. 20		"Reference"
Radiological Coordination	OP 3525	Rev. 10		"Reference"
Emergency Call-In Method	OP 3531	Rev. 16		"Reference"
Emergency Preparedness Organization	AP 3532	Rev. 11		"Information"
Post Accident Sampling of Reactor Coolant	OP 3533	Rev. 6	1	"Continuous"
Post Accident Sampling of Plant Stack Gaseous Releases	OP 3534	Rev. 4		"Continuous"
Post Accident Sampling and Analysis of Primary Containment	OP 3535	Rev. 4		"Continuous"
In Plant Air Sample Analysis with Abnormal Condition	OP 3536	Rev. 1		"Continuous"
Control Room Actions During an Emergency	OP 3540	Rev. 3		"Reference"
Activation of the Technical Support Center (TSC)	OP 3541	Rev. 2		"Reference"
Operation of the Technical Support Center (TSC)	OP 3542	Rev. 2		"Reference"
Activation of the Operations Support Center (OSC)	OP 3543	Rev. 0		"Reference"
Operation of the Operations Support Center (OSC)	OP 3544	Rev. 3		"Reference"
Activation of the Emergency Operations Facility/Recovery Center (EOF/RC)	OP 3545	Rev. 2		"Reference"
Operation of the Emergency Operations Facility/Recovery Center (EOF/RC)	OP 3546	Rev. 3		"Reference"
Security Actions During an Emergency	OP 3547	Rev. 1	1	"Reference"
Emergency Plan Training	OP 3712	Rev. 17		"Information"

TO: NRC DCC

VERMONT YANKEE CONTROLLED DOCUMENT TRANSMITTAL FORM

SECTION 1

DOCUMENT TITLE: Entergy Vermont Yankee Emergency Plan Implementing Procedures
COPY NUMBER: 54
CHANGE NUMBER: 216
ISSUE DATE: April 30, 2003

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 Procedures Administrative Assistant (PAA) or Document Control Center (DCC).
- h. Complete appropriate change information on VY Controlled Document Record of Changes.

TRANSMITTED BY: Angela M. Hogan - MC 1220
PAA or DCC Signature

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

SECTION 2

The undersigned acknowledges completion of the preceding instructions.

Signature of Recipient: _____

Date: _____

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3506

REVISION 42

EMERGENCY EQUIPMENT READINESS CHECK

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages
1	04/30/03	VYOPF 3506.02 Pgs 14,18 & 19 of 28; VYOPF 3506.07 Pg 1 of 1; VYOPF 3506.09 Pg 1 of 2; VYOPF 3506.10 Pg 1 of 1; VYOPF 3506.12 Pg 1 of 1

Implementation Statement: N/A

Issue Date: 04/02/03

EMERGENCY EQUIPMENT CHECKLIST (Continued)

ITEMS

INITIALS

- LPC1
4. RM-14 with HP-210 Probe (4)
- a. Battery check OK _____
- b. Calibration up-to-date _____
 Calibration Due Date _____
 Calibration Due Date _____
- LPC1
5. Gamma Dose Rate Meter (5)
- a. Battery check OK _____
- b. Calibration up-to-date _____
 Calibration Due Date _____
 Calibration Due Date _____
6. Inspect respirators (16) per DP 4579 _____
- a. Check expiration date on filter canisters (16) _____
- b. VYDPF 4579.04 completed and submitted for review _____
- D. Site Boundary Team Kit
1. Site Boundary clipboard _____
- a. Implementing procedure checklist (OP 3510) (2 copies) _____
 Current Rev. # _____
 LPC# _____
- b. Paper pad _____
2. High range dosimeters (4) _____
- a. Calibration up-to-date _____ (Cal. Due Date) _____
- b. Dosimeter charger operational check _____
3. Check Source _____
- a. Strength >1 mR/hr. and <4mR/hr _____

EMERGENCY EQUIPMENT CHECKLIST (Continued)

ITEMS

INITIALS

F. All equipment and materials returned to the kits and the kits sealed

G. RP Checkpoint

1. OSC Dosimetry Kit

a. Dosimeters

1) 20 Self Reading Dosimeters (SRDs)

2) 1 SRD Charger (AC)

3) 20 TLDs

4) 2 TLD Controls

5) 6 Extremity TLDs

6) 2 Extremity Controls

b. Procedures

1) AP 0506, Personnel Monitoring

Rev. LPC#

2) AP 0525, Dosimetry Processing

Rev. LPC#

3) AP 0546, Planned Special Exposure

Rev. LPC#

4) OP 3507, Emergency Radiation Exposure Control

Rev. LPC#

5) General Access RWP

c. Forms

1) NRC Form 4

2) Exposure History Release Forms

3) VYAPF 0525.06, Pregnant Woman Declaration Form

Rev. LPC#

4) VYAPF 0506.08, Multibadge TLD Location Form

Rev. LPC#

EMERGENCY EQUIPMENT CHECKLIST (Continued)

ITEMS

INITIALS

5) VYOPF 3507.01,
Personnel Exposure
Log

Rev. _____ LPC# _____

6) VYAPF 0506.07,
Administration
Radiation Exposure
Control Change
Request

Rev. _____ LPC# _____

7) VYAPF 0525.09,
Lost, Damaged or
Misused Dosimetry
Report

Rev. _____ LPC# _____

8) VYAPF 0525.08,
Visitor/Tour
Member Logsheet

Rev. _____ LPC# _____

9) AF.01, PADs
Consent Form

LPC1

10) VYAPF 0525.07,
Reg. Guide 8.13
Logsheet

Rev. _____ LPC# _____

11) VYAPF 0525.11, RWP
Sign-In Sheet

Rev. _____ LPC# _____

2. Medical Team Emergency
Electronic Dosimeters (5)

LPC1

a. Calibration
up-to-date

Cal Due Date _____

b. Replace batteries

3. Computer w/Rtime operational
(Checkpoint)

H. Maintenance Shop Entrance

1. Medical Team Emergency
Electronic Dosimeters (5)

LPC1

a. Calibration
up-to-date

Cal Due Date _____

b. Replace batteries

Performed by: _____
(Print/Sign)

Date: _____

PROCEDURE/FORM COPY UPDATE WORKSHEET

PROCEDURE/FORM			BRATTLEBORO LOCATIONS				VERNON LOCATIONS			
No.	Rev.	LPC#	#1	#2	#3	S. Rm	TSC	OSC Kits	Off-Site Kits	Gate II Kit
0506								•		
0506.07								•		
0506.08								•		
0525								•		
0525.06								•		
0525.07								•		
0525.08								•		
0525.09								•		
0525.11								•		
0537							•			
0546								•		
3507								•		
3507.01								•		
3510						•			•	•
3525					•					
3542.01							•			
4533.01					•		•			
7019			•							
VYP:317				•						

EOF EMERGENCY PLAN IMPLEMENTING PROCEDURES AND
STATUS FORMS BOOK UPDATE

Change # _____

Initials

A. Emergency Equipment Cabinet #1 for use by the Site Recovery Manager

1. Update Emergency Plan Implementing Procedures per the Procedure Change Memo _____
2. Update ERF Directory (OP 3504, Emergency Communications) _____
3. Update status forms book for any changes to the following:
 - a. AP 3125, Emergency Plan Classification and Action Level Scheme
(4 large copies of appendices for Sprinkler Room) _____
 - b. OP 3511, Off-Site Protective Action Recommendations _____
 - c. VYOPF 3511.01, Protective Action Recommendation Worksheet _____
 - d. VYOPF 3546.02, Emergency Classification and PAR Notification Upgrade Form _____
 - e. VYOPF 3546.01, Plant Status Briefing Form _____
 - f. OP 3546, Appendices: A,B,C,E,F,I,J,K,M,N,O,P,Q _____

I-LPC1

I-LPC1

B. Emergency Equipment Cabinet #2 for use by the EOF Coordinator

1. Update Emergency Plan Implementing Procedures per the Procedure Change Memo _____
2. Update ERF Directory (OP 3504, Emergency Communications) _____
3. Update status forms book for any changes to the following:
 - a. VYOPF 3542.01, Personnel Accountability Log _____
 - b. VYOPF 3504.02, Plant Parameters _____
 - c. OP 3511, Off-Site Protective Action Recommendations _____

OSC EMERGENCY PLAN IMPLEMENTING PROCEDURES AND
STATUS FORMS BOOK UPDATE

Change # _____

Initials

- A. Update Emergency Plan Implementing Procedures per the
Procedure Change Memo _____
- B. Update status forms drawer for any changes to the following:
1. OP 3507, Emergency Radiation Exposure Control _____
 2. OP 3544, Appendix A - Alert - Radiological
Habitability Assessment _____
 3. OP 3544, Operation of the Operations Support Center _____
 4. VYOPF 3544.01, Emergency Conditions Radiological
Assessment Form _____
 5. VYOPF 3544.02, OSC Team Work Status Form _____
 6. VYOPF 3507.01, Personnel Exposure Log _____
 7. VYOPF 3507.02, Emergency Radiation Exposure
Briefing/Debriefing _____
 8. VYOPF 3507.03, Potassium Iodide Administration Record _____
 9. VYOPF 3524.02, Initial Site Accountability Check-In
Form _____
 10. OP 3543, Table 1 - Personnel Assignment List _____
 11. VYOPF 3542.01, Personnel Accountability Log _____

Discrepancies or Comments:

Performed By _____ / _____
(Print/Sign) Date

Reviewed By _____ / _____
EPC (Print/Sign) Date

TSC EMERGENCY PLAN IMPLEMENTING PROCEDURES AND
IMPLEMENTING FORMS BOOK UPDATE

Change # _____

- A. Update Emergency Plan Implementing Procedures per the Procedure Change Memo _____
- B. Update status forms book for any changes to the following:
1. OP 3542, Operation of the Technical Support Center _____
 2. VYOPF 3542.01, Personnel Accountability Log _____
 3. VYOPF 3524.02, Initial Site Accountability Check In Form _____
 4. VYOPF 3504.02, Plant Parameters _____
 5. VYOPF 3540.06, Emergency Classification and PAR Notification Form _____
- C. Update five (5) clipboards for any changes to the following:
1. VYOPF 3542.01 Personnel Accountability Log. _____
- D. Update (1) clipboard for any changes to the following:
1. VYOPF 3524.02, Initial Site Accountability Check In Form _____

Discrepancies or Comments:

Performed By _____ / _____
(Print/Sign) Date

Reviewed By _____ / _____
EPC (Print/Sign) Date

PREAPPROVED LPC FORM

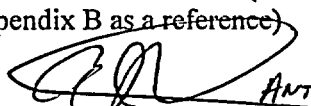
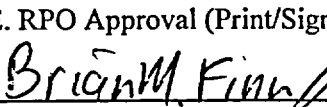
PART 1 - Initiation

☐ Converted to Admin. Revision #

LPC No: /

A. Procedure No.: OP 3506	Current Revision #: 42	Title: Emergency Equipment Readiness Check
B. Description of Change: <ul style="list-style-type: none"> Changed the number of RM-14's and Gamma Dose Rate Meters due to the elimination of GHH team. Increased the number of TLDs in the OSC Dosimetry Kit. <i>- Added Media Advisor logbook to cab#1.</i> Removed the line requiring a Rev./LPC# for the AF.01 forms. Added Medical Team Emergency Electronic Dosimeters to Check Point area and Maintenance Shop Entrance. (ER-2003-0619_01) Removed AF.01 form from VYOPF 3506.07. Added OP 3546 Appendices to VYOPF 3506.09 for the EOF status forms book. Added OP 3543, Table 1 and VYOPF 3542.01 to VYOPF 3506.10 for the OSC status forms drawer. VYOPF 3506.12 - changed the (5) clipboards to VYOPF 3542.01 forms and added (1) clipboard with VYOPF 3524.02 forms. 		
C. Reason for Change: <input type="checkbox"/> Result of Design Change, Minor Mod, EDCR <input type="checkbox"/> Related ER No. _____ <input checked="" type="checkbox"/> Other: <u>Identified during RP surveillance & ER-2003-0619_01</u> <input type="checkbox"/> Editorial		
D. Duration: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> One Time Only E. Surveillance Database Change? <input type="checkbox"/> Yes, change submitted <input checked="" type="checkbox"/> No F. Procedure Type: <input checked="" type="checkbox"/> Technical <input type="checkbox"/> Admin. (AP,PP) G. AP 0091, Risk Assessment <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H. Page(s) affected: <u>VYOPF 3506.02 pgs 14, 18, 19; VYOPF 3506.07 pg 1;</u> <u>VYOPF 3506.09 pg 1; VYOPF 3506.10 pg 1; VYOPF 3506.12 pg 1.</u>		I. Originator (Print/Sign/Date) (Use AP 0096, App. A as a reference) (Complete & attach AP 0096 App. C, unless editorial) Audra Williams 4/15/03 <i>Audra Williams</i>

PART 2 - Review/Approval (Refer to LPC Criteria of Appendix A)

A. Technical Verification Review (Print/Sign/Date) (Use AP 0096, Appendix B as a reference) <input type="checkbox"/> N/A <div style="text-align: right; margin-right: 50px;">4/16/03</div> <div style="text-align: center;">  ANTHONY J. FLAHERTY (May perform Qualified Review) (N/A if editorial change) </div>	B. Cross-Discipline Review(s) (Print/Sign/Date) <input type="checkbox"/> N/A <div style="text-align: right; margin-right: 50px;">4/15/03</div> <div style="text-align: center;"> Audra Williams <i>Audra Williams</i> </div>
C. Qualified Review (Print/Sign/Date) (Use AP 0096, Appendix D, as a reference) <input type="checkbox"/> N/A <div style="text-align: right; margin-right: 50px;">4-16-03</div> <div style="text-align: center;"> Audra Williams <i>Audra Williams</i> (N/A if editorial change) </div>	D. 50.59 review completed type: <input type="checkbox"/> AD/Screen <input type="checkbox"/> Evaluation <input checked="" type="checkbox"/> N/A (N/A if editorial change) <input checked="" type="checkbox"/> 50.54(q) (EPIP only)
E. RPO Approval (Print/Sign/Date) 4/16/03 <div style="text-align: center;">  Brian M. Finn </div>	F. IF 50.59 Evaluation: <input checked="" type="checkbox"/> N/A PORC Mtg. Date:
G. Plant Manager (Print/Sign/Date) (SPs only) N/A	
H. Training: (Required for Admin Procedures, unless editorial) <input type="checkbox"/> N/A E-Mail Notification to RP	
I. Effective Date: 4/30/03	

CDS Initials *JAG*

APPENDIX C **CROSS-DISCIPLINE REVIEW CHECKLIST**

Required to be completed for new procedures, procedure revisions, and LPCs unless they are designated as Editorial.

Procedure Number/Revision OP 3506 Rev. 42 LPC1
Reviewer/Date (Print) Audra Williams 4/15/03

GENERAL REVIEW GUIDELINES/SPECIAL REVIEW REQUIREMENTS

- The Cross-Discipline Review Guidelines below constitute minimum review requirements; other reviews may apply.
- Determination of reviews should focus on *changes* made to a procedure and the potential impact of those changes on the affected group. Changes that are minimally or nonimpacting do not need review by the potentially affected group. If change impact is unclear, the procedure should be routed to the potentially affected group for review.
- New or revised Administrative or Program Procedures that significantly impact other departments, shall be reviewed by the appropriate Superintendent or Senior Manager. The PAA maintains a list of these Administrative and Program Procedures.
- ALL noneditorial changes to Special Process procedures (WP, NE, heat treating, etc.), including Vendor Procedures that address Special Processes, shall be reviewed by: a Welding Engineer (welding procedures) or a NDE Level III certified in the method addressed by the procedure (nondestructive examination procedures), AND the Quality Assurance Manager, AND submitted to the Authorized Nuclear Inservice Inspector (ANII) prior to use.
- A "YES" indicates that a Cross Discipline Review shall be done by the indicated Department. Document the review on VYAPF 0096.01, VYAPF 0097.01, or VYAPF 0097.02, as applicable.

	APPLICABLE	
	YES	NO
Chemistry: <ul style="list-style-type: none"> • Potentially affects condensate, feedwater, or reactor water chemistry, or chemistry instruments. • Procedures that implement the requirements of the VY Environmental Program. (see PP 7603, Appendix A) • Produces/affects effluents or effluent monitoring (VY/QA 01-015). • Affects NPDES limits or method of compliance. 		✓
Maintenance (Mech, Elec, I&C): <ul style="list-style-type: none"> • Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&TE, lifting and landing of leads and connectors. 		✓
Operations: <ul style="list-style-type: none"> • Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO. • Requires Operations alignment/restoration of systems or components. • Specifies surveillance or post maintenance testing by Operations. 		✓
EOP/SAG Coordinator: <ul style="list-style-type: none"> • Procedures that have the potential to affect the EOPs/SAGs. 		✓

APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
Quality Assurance: <ul style="list-style-type: none"> Changes to procedures that implement the requirements of the VOQAM. (see PP 7802, Appendix B) New procedures that have a potential for reduction of VOQAM commitments. Obtain and attach a 10CFR50.54(a)(3) evaluation. 		✓
Radiation Protection: <ul style="list-style-type: none"> Involves work in contaminated areas and high radiation areas. Involves work that breaches contaminated systems or components. Changes in radwaste or hazardous waste generation. 		✓
Emergency Plan Coordinator: <ul style="list-style-type: none"> Emergency Plan Implementing Procedures. Obtain and attach a 10CFR50.54(q) Evaluation. Affects Emergency Plan personnel, facilities or equipment. 	✓	
Software Quality Assurance Administrator <ul style="list-style-type: none"> Procedures that define how software is developed. 		✓
Reactor Engineering: <ul style="list-style-type: none"> Could affect core reactivity, thermal power, reactor heat balance, or fuel integrity. Involves refueling operations. 		✓
Systems/Project/Design Engineering: <ul style="list-style-type: none"> Maintenance Rule in-scope systems unavailability time. Involves infrequently performed test or evolution. Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO. Significant changes in system test or operation methodology. 		✓
Appendix J Coordinator: <ul style="list-style-type: none"> Changes that affect App. J leakrates or containment boundaries, or boundary valve manipulation. 		✓
Appendix R Coordinator: <ul style="list-style-type: none"> Appendix R implementing procedures. 		✓
Environmental Qualification (EQ) Coordinator: <ul style="list-style-type: none"> Change in EQ test methodology or component lifetime. Potentially affects area EQ component environment. 		✓
Fire Protection Coordinator (FPC): <ul style="list-style-type: none"> Fire Protection procedures. Affects fire loading Affects fire barrier integrity. Affects fire protection systems or component functionality. 		✓
IST Program Coordinator: <ul style="list-style-type: none"> Inservice Testing Program implementing procedures. All surveillance procedures. 		✓
ISI Program Coordinator: <ul style="list-style-type: none"> Inservice Inspection Program implementing procedures. 		✓

APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
Setpoint Coordinator: <ul style="list-style-type: none"> Changes that impact setpoints, as-found/as-left tolerances, M&TE or testing methodology. 		✓
Nuclear & PRA <ul style="list-style-type: none"> Potentially affects IPEEE or ORAM Sentinel Risk Models. Potentially affects plant SSCs reliability. Potentially affects Nuclear or Radiological Safety Analysis. 		✓
Security: <ul style="list-style-type: none"> Proceures that implement the requirements of the VY Physical Security and Training and Qualification Plans. Changes that have a potential for reduction of the VY Physical Security and Training and Qualification Plan commitments. Obtain and attach a 10CFR50.54(P) Evaluation. 		✓

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 3506, Emergency Equipment Readiness Check, Rev. 42, LPC #1

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.

		YES	NO
1.	Could the proposed change affect our ability to meet the following standards of 10CFR50.47(b):		
(1)	Assignment of Emergency Response Organization responsibilities		X
(2)	Assignment of on-shift Emergency Response Organization personnel		X
(3)	Arrangements for Emergency Response Support and Resources		X
(4)	Emergency Classification and Action levels, including facility system and effluent parameters		X
(5)	Notification Methods and Procedures		X
(6)	Emergency Communications among principal response organizations and the public		X
(7)	Public Education and Information		X
(8)	Adequacy of Emergency Facilities and Equipment	X	
(9)	Adequacy of Accident Assessment methods, systems and equipment		X
(10)	Plume exposure pathway EPZ protective actions		X
(11)	Emergency Worker Radiological Exposure Control	X	
(12)	Medical Services for contaminated injured individuals	X	
(13)	Recovery and Reentry Plans		X
(14)	Emergency response periodic drills and exercises		X
(15)	Radiological Emergency Response Training		X
(16)	Plan development, review and distribution		X

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.~~

YES	NO
-----	----

2. Could the change affect our ability to meet the following requirements of Appendix E to 10CFR50

- (1) Section IV. A - Organization
- (2) Section IV. B - Assessment Actions
- (3) Section IV. C - Activation of Emergency Organizations
- (4) Section IV. D - Notification Procedures
- (5) Section IV. E - Emergency Facilities and Equipment
- (6) Section IV. F - Training
- (7) Section IV. G - Maintaining Emergency Preparedness
- (8) Section IV. H - Recovery

	X
	X
	X
	X
X	
	X
	X
	X

B. Effectiveness Determination

For each applicable (i.e., a "yes" answer specified) standard to 10CFR50.47(b) and Appendix E to 10CFR50 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 10CFR50.47 (b) (8), (11), (12) & Appendix E, Section IV. E 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:

Changes to the procedure were to properly identify the number of RM-14's, gamma dose rate meters and TLDs that now reside in the RP area since the removal of the GHH team kit. The medical team emergency electronic dosimeters and their locations were added. Other procedure changes identify the proper procedure forms located in various status forms books.

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 10CFR50.47(b) and the requirements of Appendix E to 10CFR50.
- ☐ The changes made do decrease the effectiveness of the Emergency Plan and decrease our ability to meet the standards of 10CFR50.47(b) and the requirements of Appendix E to 10CFR50. 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 10CFR50.54(q).

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

Keywords used in search: dosimeters, electronic dosimeters

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

Document(s) affected: OP 3508

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: dosimeters, electronic dosimeters

Additional Comments:

Prepared By: Christina M. Canty Christina M. Canty Date: 4/16/03
(Print/Sign)

Reviewed By: Audra Williams Audra Williams Date: 4/16/03
(Emergency Plan Coordinator) (Print/Sign)

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3525

REVISION 10

RADIOLOGICAL COORDINATION

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages

Implementation Statement: N/A

Issue Date: 04/30/2003

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PURPOSE

To direct VY Off-Site and Site Boundary Monitoring Teams and Environmental Radiation Sampling Teams, evaluate results obtained by these teams, and coordinate and verify teams' results with off-site agencies' monitoring data.

DISCUSSION

OFF-SITE AND SITE BOUNDARY MONITORING TEAMS

The task of each monitoring team is to collect radiological data and air samples downwind of the plant in order to determine the extent and magnitude of any release of radioactive material. Prior to the EOF becoming operational, the OSC assigns personnel to the monitoring teams. When radio communication is established with the TSC, the TSC will assume responsibility for and direct the teams as needed until the EOF becomes operational. When the EOF becomes operational and radio contact has been established with the teams, the Radiological Coordinator assumes responsibility for the overall direction of the monitoring teams.

Teams transmit initial data to the Radiological Coordinator to facilitate rapid dose assessment of accident conditions. Samples taken are provided to the Radiological Coordinator for further radionuclide verification. Results obtained from the VY teams are immediately analyzed and the results reported to the Radiological Coordinator.

The Radiation Protection Superintendent or the Supervisor, Radiation Control determines and arranges for additional counting equipment if needed.

VY ENVIRONMENTAL RADIATION SAMPLING TEAMS

As personnel availability and emergency conditions permit, the Radiological Coordinator, located at the EOF/RC, directs the collection of air filters and TLDs from the Off-Site Environmental Monitoring Program in downwind locations. At the discretion of the Radiological Coordinator, other environmental samples such as milk, ground water, and vegetation are collected according to methods prescribed in OP 4605, Environmental Radiation Sampling and Analysis.

OFF-SITE AGENCIES' TEAMS

VY off-site teams' results are compared to off-site agencies' results for consistency and accuracy. If discrepancies are noted, the Radiological Assistant is notified by the Radiological Coordinator. To ensure consistency of information released to the public, the Radiological Coordinator attempts to resolve the inconsistent data with the off-site agencies.

In accordance with AP 6002, Preparing 50.59 Evaluations, the results of an Applicability Determination (AD) has determined that an AD is not required for future changes provided the scope of the procedure or program is not revised to include a different type of activity. The basis for this conclusion is that this document is an Emergency Implementing Procedure and is subject to 10CFR50.54(q) to determine if the changes decrease the effectiveness of the Emergency Plan and if they have the potential to affect our ability to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50 Appendix E.

ATTACHMENTS

1. VYOPF 3525.01 Radiological Coordinator's Log

REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
 - a. None
2. Codes, Standards, and Regulations
 - a. None
3. Commitments
 - a. None
4. Supplemental References
 - a. OP 3509, Environmental Sample Collection During an Emergency
 - b. OP 3510, Off-Site and Site Boundary Monitoring
 - c. OP 3513, Evaluation of Off-Site Radiological Conditions
 - d. OP 4605, Environmental Radiation Sampling and Analysis

PROCEDURE

A. GENERAL

1. Obtain equipment from the Radiological Coordinator's Emergency Equipment Cabinets located in the EOF/RC.

B. OFF-SITE AND SITE BOUNDARY MONITORING TEAMS

1. When the EOF becomes operational and radio communications have been established with the teams, inform the Radiological Assistant, teams, and TSC Radio Operator, that you are assuming responsibility for the direction and coordination of the teams, consistent with OP 3510.
2. If conditions warrant, activate a third (black) off-site monitoring team.

3. Ensure that the appropriate field monitoring data reported to the EOF, are recorded on VYOPF 3513.03 and VYOPF 3513.04.
4. Ensure that monitoring teams are informed of pertinent information (e.g., escalations, when to don respirators, or take KI, if necessary).
5. Coordinate the dispatching and location of off-site monitoring teams with appropriate State representatives located at the EOF.

C. ENVIRONMENTAL RADIATION SAMPLING TEAMS

1. Coordinate the implementation of OP 3509, and prioritize the assignment of desired environmental samples to be collected and analyzed.
2. Direct and coordinate the activities of the VY sampling teams in the collection of the desired environmental samples.
3. Record the appropriate information of all incoming environmental samples on VYOPF 3525.01 (e.g., TLDs, water, silage, grass, etc.).
4. Report sample results to the Radiological Assistant.
5. Compare the results of environmental samples with the results obtained by off-site agencies (if available and on similar samples).
6. Ensure that calculations are reviewed and that the results obtained are representative and accurate.
7. Keep the Radiological Assistant informed of other significant results obtained by off-site agencies.

FINAL CONDITIONS

1. Return equipment to the appropriate emergency equipment cabinets.
2. Submit completed copy of log sheets and calculations to the Radiological Assistant.
3. Close out with off-site agencies.

RADIOLOGICAL COORDINATOR'S LOG

DATE _____

DATE _____

[illegible]

* - Preliminary, or O - Official

REVISED PROCEDURE CONTROL FORM

PART 1 - Initiation

A. Procedure No. OP 3525	New Revision No. 10	Title Radiological Coordination	
B. Review Criteria: <input type="checkbox"/> Partial <input type="checkbox"/> Editorial <input checked="" type="checkbox"/> Complete		C. Periodic Review Cycle: <input checked="" type="checkbox"/> 2 Year (Event Driven) <input type="checkbox"/> N/A	
D. List DIs & LPCs: N/A			
E. Description and Reasons for Procedure/Changes: • Added text to control the need for future Applicability Determinations. • Title changes			
F. Originator Name: (App. A was used as references to create this revision, App. C is completed and attached unless Part 1.B above is "Editorial".) (Print/sign/date) Audra Williams <i>Audra Williams</i> 1/6/03			Telephone Extension: x4177

PART 2 - Reviews

A. Walk-Through Validation: <input type="checkbox"/> Required <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Field Walk-Through <input type="checkbox"/> Table-Top <input type="checkbox"/> Simulator Validation		B. Technical Verification Reviewer <input type="checkbox"/> N/A (App. B used as a reference) 2/7/03 (Print/Sign/Date) <i>Lori A. Tkaczuk Lori A. Tkaczuk</i>	
C. Cross-Discipline Reviews: <input type="checkbox"/> N/A			
Department	Name	Signature	Date
Rad Protection	<i>Mike Mungen</i>	<i>Mungen</i>	2/5/03
D. 50.59 Review Per AP 6002, Preparing 50.59 Evaluations <input type="checkbox"/> N/A <input type="checkbox"/> 50.59 AD previously performed and documented in the text of this procedure and is still applicable. <input checked="" type="checkbox"/> 50.59 Applicability Determination completed and attached; 50.59 Screening NOT required. <input type="checkbox"/> 50.59 Review Screening completed and attached, 50.59 Evaluation NOT required. <input type="checkbox"/> 50.59 Evaluation completed and attached.			
E. QUALIFIED REVIEWER: Use App. D as a reference (May perform 50.59 Applicability Determination) (Part 2.D) (Print/Sign/Date) <i>Audra Williams Audra Williams</i> 2.6.03			
F. ORIGINATOR: <input checked="" type="checkbox"/> Comments Resolved <input checked="" type="checkbox"/> Re-verify All DIs & LPCs Considered <input checked="" type="checkbox"/> Sent for Final Type (CDS or STC (SPs only)) Initial/Date <i>OWR 4/2/03</i> <input checked="" type="checkbox"/> Proofread after Final Type (Print/Sign/Date) <i>Audra Williams Audra Williams</i> 4.3.03			

PART 3 - Training/Notification Requirements

A. Indicate training or notifications required to implement procedure: (Required for Administrative Procedures)

☐ Include in formal training (TCR submitted):

☐ E-Mail notification:

☐ Crew Briefings:

☐ Other:

☒ N/A

PART 4 - PORC

Plant Operation Review Committee: ☐ Required ☒ N/A

Meeting No:

PORC Secretary:

Date:

Plant Manager:

PART 5 - Approval

A. Responsible Procedure Owner: (Print/Signature/Date)

Brian M. Finn *Brian M. Finn* 4/3/03

B. Plant Manager (Print/Sign/Date) (For SPs Only)

N/A

C. Special Instructions: ☐ N/A

☐ Approved for Training

☒ Issue on DATE: 4.30.03

☐ Submit Surveillance Database Change per AP 4000

☐ Other:

PART 6 - Issuance

Procedure Change No.: 216

Date procedure issued: 4/30/03

Notes:

APPENDIX C CROSS-DISCIPLINE REVIEW CHECKLIST

Required to be completed for new procedures, procedure revisions, and
LPCs unless they are designated as Editorial.

Procedure Number/Revision OP 3525, Rev. 10

Reviewer/Date (Print) Audra Williams 1/6/03

GENERAL REVIEW GUIDELINES/SPECIAL REVIEW REQUIREMENTS

- The Cross-Discipline Review Guidelines below constitute minimum review requirements; other reviews may apply.
- Determination of reviews should focus on *changes* made to a procedure and the potential impact of those changes on the affected group. Changes that are minimally or nonimpacting do not need review by the potentially affected group. If change impact is unclear, the procedure should be routed to the potentially affected group for review.
- New or revised Administrative or Program Procedures that significantly impact other departments, shall be reviewed by the appropriate Superintendent or Senior Manager. The PAA maintains a list of these Administrative and Program Procedures.
- ALL noneditorial changes to Special Process procedures (WP, NE, heat treating, etc.), including Vendor Procedures that address Special Processes, shall be reviewed by: a Welding Engineer (welding procedures) or a NDE Level III certified in the method addressed by the procedure (nondestructive examination procedures), AND the Quality Assurance Manager, AND submitted to the Authorized Nuclear Inservice Inspector (ANII) prior to use.
- A "YES" indicates that a Cross Discipline Review shall be done by the indicated Department. Document the review on VYAPF 0096.01, VYAPF 0097.01, or VYAPF 0097.02, as applicable.

	APPLICABLE	
	YES	NO
Chemistry: <ul style="list-style-type: none"> Potentially affects condensate, feedwater, or reactor water chemistry, or chemistry instruments. Procedures that implement the requirements of the VY Environmental Program. (see PP 7603, Appendix A) Produces/affects effluents or effluent monitoring (VY/QA 01-015). Affects NPDES limits or method of compliance. 		X
Maintenance (Mech, Elec, I&C): <ul style="list-style-type: none"> Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&TE, lifting and landing of leads and connectors. 		X
Operations: <ul style="list-style-type: none"> Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO. Requires Operations alignment/restoration of systems or components. Specifies surveillance or post maintenance testing by Operations. 		X
EOP/SAG Coordinator: <ul style="list-style-type: none"> Procedures that have the potential to affect the EOPs/SAGs. 		X

APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
Quality Assurance: <ul style="list-style-type: none"> Changes to procedures that implement the requirements of the VOQAM. (see PP 7802, Appendix B) New procedures that have a potential for reduction of VOQAM commitments. Obtain and attach a 10CFR50.54(a)(3) evaluation. 		X
Radiation Protection: <ul style="list-style-type: none"> Involves work in contaminated areas and high radiation areas. Involves work that breaches contaminated systems or components. Changes in radwaste or hazardous waste generation. 	X	
Emergency Plan Coordinator: <ul style="list-style-type: none"> Emergency Plan Implementing Procedures. Obtain and attach a 10CFR50.54(q) Evaluation. Affects Emergency Plan personnel, facilities or equipment. 	X	
Software Quality Assurance Administrator <ul style="list-style-type: none"> Procedures that define how software is developed. 		X
Reactor Engineering: <ul style="list-style-type: none"> Could affect core reactivity, thermal power, reactor heat balance, or fuel integrity. Involves refueling operations. 		X
Systems/Project/Design Engineering: <ul style="list-style-type: none"> Maintenance Rule in-scope systems unavailability time. Involves infrequently performed test or evolution. Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO. Significant changes in system test or operation methodology. 		X
Appendix J Coordinator: <ul style="list-style-type: none"> Changes that affect App. J leakrates or containment boundaries, or boundary valve manipulation. 		X
Appendix R Coordinator: <ul style="list-style-type: none"> Appendix R implementing procedures. 		X
Environmental Qualification (EQ) Coordinator: <ul style="list-style-type: none"> Change in EQ test methodology or component lifetime. Potentially affects area EQ component environment. 		X
Fire Protection Coordinator (FPC): <ul style="list-style-type: none"> Fire Protection procedures. Affects fire loading Affects fire barrier integrity. Affects fire protection systems or component functionality. 		X
IST Program Coordinator: <ul style="list-style-type: none"> Inservice Testing Program implementing procedures. All surveillance procedures. 		X
ISI Program Coordinator: <ul style="list-style-type: none"> Inservice Inspection Program implementing procedures. 		X

APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
Setpoint Coordinator: <ul style="list-style-type: none"> Changes that impact setpoints, as-found/as-left tolerances, M&TE or testing methodology. 		X
Nuclear & PRA <ul style="list-style-type: none"> Potentially affects IPEEE or ORAM Sentinel Risk Models. Potentially affects plant SSCs reliability. Potentially affects Nuclear or Radiological Safety Analysis. 		X
Security: <ul style="list-style-type: none"> Proceures that implement the requirements of the VY Physical Security and Training and Qualification Plans. Changes that have a potential for reduction of the VY Physical Security and Training and Qualification Plan commitments. Obtain and attach a 10CFR50.54(P) Evaluation. 		X

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 3525, Rev 10, Radiological Coordination

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

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

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 NOT decrease the effectiveness of the Emergency Plan and DOES continue to meet the stated applicable standard or requirement.

BASIS FOR ANSWER:

Added a statement to control the need of an Applicability Determination. No other changes made.

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:

Administrative change only.

Prepared By: Audra Williams *Audra Williams*
(Print/Sign)

Date: 1/6/03

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

Date: 2/7/03

APPLICABILITY DETERMINATION

Activity/Document Number: OP 3525 Revision Number: 10

Title: Radiological Coordination

Provide or attach a brief description of activities (section 6.3 of RM):

Added text to control the need for future Applicability Determinations.

Address the questions below for all aspects of the activity. If the answer is "YES" for any portion of the activity, apply the identified process to that portion of the activity. It is not unusual to have more than one process apply to a given activity. For example, a change to a door that is a fire door, a security door and a secondary containment door would require an evaluation to the Fire Protection license condition, 10CFR50.54 (p) and a 50.59 screen. See Section 4 of the "50.59 Resource Manual" (RM) for additional guidance.

I. Does the proposed activity involve a change to the:	Section 4.2.1 of the RM
1. Technical Specifications or Operating License (10CFR50.90)? Note that stand-alone changes to the TS Bases are evaluated in accordance with 10CFR50.59 per AP 0063.	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES process per AP 0063) </div>
2. Quality Assurance Plan, related implementing procedures identified in PP 7802 or facility changes (10CFR50.54(a))?	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES contact QA for 10CFR50.54(a)(3) assessment) </div>
3. Security Plan, related implementing procedures or facility changes (10CFR50.54(p))?	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES contact Security for 10CFR50.54(p) assessment) </div>
4. Emergency Plan, related implementing procedures or facility changes (10CFR50.54(q))?	<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (If YES contact E-Plan for 10CFR50.54(q) assessment per AP 3532) </div>
5. IST Program Plan, related implementing procedures or facility changes (10CFR50.55a(f))?	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES, and a deviation from the code requirement is required, contact Licensing to ensure applicable NRC approval is obtained per AP 0058) </div>
6. ISI Program Plan, related implementing procedures or facility changes (10CFR50.55a(g))?	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES, and a deviation from the code requirement is required, contact Licensing to ensure applicable NRC approval is obtained per AP 0058) </div>
7. Fire protection program, related implementing procedures or facility changes (License Condition 3.F)?	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES provide an evaluation that satisfies License Condition 3.F) </div>

II. Does the proposed activity involve:		Section 4.2.2 of the RM
1. Maintenance which restores SSCs to their original condition.	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES perform maintenance in accordance with plant procedures (e.g. AP 0021, AP 0049, AP 0050)
2. A temporary alteration supporting maintenance that will be in effect during at-power operations for 90 days or less that has been (or will be) evaluated under 10CFR50.65(a)(4) prior to implementation?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process in accordance with AP 0091.)
III. Does the proposed activity involve a change to the UFSAR (including documents <i>incorporated by reference</i>) excluded from the requirement to perform a 50.59 Review (NEI 96-07 or NEI 98-03)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	Section 4.2.3 of the RM (If YES, process FSAR change per AP 6036 "FSAR Revision Process". Include basis for excluding 10CFR50.59 evaluation below.)
IV. Does the proposed activity involve a change to the:		Section 4.2.4 of the RM
1. Managerial or administrative procedures governing the conduct of Facility operations, maintenance and training (subject to the control of 10CFR50, Appendix B) (RM section 4.2.4). Some procedures may be VOQAM implementing procedures requiring evaluation per 10CFR50.54(a)(3) (prompted above). Also, Maintenance procedure changes that include changes to Design Information, not evaluated under a design change process, shall be evaluated in accordance with 10CFR50.59	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process per procedure change process (e.g. AP 0095, AP 0096, AP 0097))
2. Regulatory commitment where changing commitment is not covered by another regulation based change process (NEI 99-04)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process per AP 0055 "Regulatory Commitment Management".)
V. Does the activity impact other plant specific programs (e.g., The ODCM and PCLRTP controlled per TS 6.7 and the PCP controlled per TRM Section 6) which are controlled by regulations, the Operating License, the Technical Specifications or TRM ?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process per the procedure(s) for the appropriate activity.)
VI. Is the activity covered by any other specific regulatory change process not discussed above that would preclude the need to evaluate under 10CFR50.59 ? (e.g., 10CFR50.46 for changes to ECCS models and PCT changes, 10CFR50.12 for Exemption Requests, etc)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES document below and process per applicable regulatory requirements.)
VII Does the activity require a 50.59 Screen based on the following Generic NRC correspondence? GL 95-02 for performing Analog-to-Digital upgrades, IEB 80-10 for Contamination of non-radioactive systems, IEC 80-18 for changes to radioactive waste systems and GL 91-18 for compensatory actions including using manual actions in-lieu of automatic actions or use-as-is dispositions affecting the FSAR. GL 95-02 assessments need to look at both system and component level failures (ER20000558 01)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES complete 50.59 Screen for the subject activity.)

☒ All aspects of the activity are controlled by one or more of the processes above, therefore a 50.59 Screen is not required. If checked, provide any additional comments below and sign and date below.

☐ Any portion of the activity is not controlled by one or more of the processes above, therefore a 50.59 Screen or 50.59 Evaluation is required. If checked, provide any additional comments below, sign and date below and complete 50.59 Screen for identified activities.

Additional Applicability Considerations:

Applicability Signoffs: Preparer: Audra Williams Audra Williams Date: 1 / 06 / 03
(Print name) (Sign)

Reviewer: Lori A. Tkaczyk Lori A. Tkaczyk Date: 2 / 7 / 03

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3712

REVISION 17

EMERGENCY PLAN TRAINING

USE CLASSIFICATION: INFORMATION

LPC No.	Effective Date	Affected Pages

Implementation Statement: N/A

Issue Date: 04/30/2003

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PURPOSE

To specify the Emergency Plan training requirements for the Vermont Yankee staff and supporting contractors and to outline the training provided for local medical support personnel, local fire department, the news media, and state and local government emergency assistance personnel in support of the emergency response.

DISCUSSION

Vermont Yankee staff and supporting contractors annually receive a general overview training module covering the Emergency Plan and the Implementing Procedures to the Emergency Plan as part of GET. Additionally, some personnel receive Emergency Response Organization (ERO) position specific training to qualify them for their respective assignments during an Emergency. These position specific training modules and assignments to them are specified by the Emergency Planning Training Program Description (EPTPD). The Emergency Assistance Personnel List (EAPL), which is formulated by the Emergency Plan On-Site Coordinator, identifies individuals assigned to ERO positions.

The Emergency Plan Manager, in conjunction with the Supt. Nuclear Training will evaluate changes to the Emergency Plan and the Implementing Procedures to the Emergency Plan to determine if the change or changes require additional training (MOO ID 8714). Similarly, the Emergency Plan Manager and the Supt. Nuclear Training review and approve applicable Emergency Plan training materials for use (INS8707CPE2).

Critiques will be held following all drills and exercises. A formal management debrief will be held following all graded exercises. Identified weaknesses and/or deficiencies requiring further corrective action will be forwarded to the Emergency Plan Manager for resolution in accordance with OP 3505, Section C. (MOO ID 8914)

In accordance with AP 6002, Preparing 50.59 Evaluations, the results of an Applicability Determination (AD) has determined that an AD is not required for future changes provided the scope of the procedure or program is not revised to include a different type of activity. The basis for this conclusion is that this document is an Emergency Implementing Procedure and is subject to 10CFR50.54(q) to determine if the changes decrease the effectiveness of the Emergency Plan and if they have the potential to affect our ability to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50 Appendix E.

ATTACHMENTS

1. None

REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
 - a. Vermont Yankee Emergency Plan
2. Codes, Standards, and Regulations
 - a. Appendix E, 10CFR50
3. Commitments
 - a. None
4. Supplemental References
 - a. Vermont Yankee Implementing Procedures to the Emergency Plan
 - b. Training Department Directives
 - c. Emergency Plan Training Program Description
 - d. AP 0700, Vermont Yankee Staff Training
 - e. AP 0840, Medical Response Team Training
 - f. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

RESPONSIBILITIES

1. The Emergency Plan Manager has the overall responsibility to ensure all training is completed in accordance with Emergency Plan Training Program Description. (SSCA0983, IFI932401)
2. The Emergency Plan Drill/Exercise Coordinator is responsible for coordinating the training of the local medical support personnel, state and local government personnel, and personnel from the Vernon fire department and other Southwestern Fire Mutual Aid District fire departments within the VY 10 mile EPZ. The Training Department will, upon request, assist in this effort (Section II.A, B, C of this procedure) (SSCA 0539 and SSCA 0618).
3. The Director, Public Affairs is responsible for providing subject matter experts to assist in the annual training of the news media and Joint News Center Staff.
4. The Training Department is responsible for completion of training in accordance with the ETPD under the direction of the Supt. Nuclear Training.

5. Vermont Yankee Emergency Plan Training as provided in the EPTPD is based upon Appendix E to 10CFR50, Vermont Yankee's Emergency Plan, and the Implementing Procedures to the Emergency Plan. Personnel are assigned to a specific ERO position through the Emergency Assistance Personnel List. The Emergency Plan On-Site Coordinator maintains the Emergency Assistance Personnel List
6. On a quarterly basis, the Emergency Plan On-Site Coordinator will publish an updated Emergency Assistant Personnel List. The list will show who has completed emergency response training. (MOO ID 8714)
7. The Emergency Assistance Personnel List assignments will be audited annually by the Emergency Plan Manager in conjunction with the Vice President, Operations, and General Manager to ensure continued concurrence with emergency response assignments. (MOO ID 8714)

PROCEDURE

Emergency Plan training will be provided for the following groups.

I. EMERGENCY RESPONSE TRAINING

Emergency Response Organization training is required for initial qualification and annual (calendar year) refresher/continuing training.

The initial position specific emergency response training and the continuing training is defined in the EPTPD for all but the following personnel.

A. Medical Response Team

Medical Response Team training requirements are specified in AP 0840.

B. Fire Brigade

Fire Brigade Training requirements are specified in AP 3700.

II. SPECIAL EMERGENCY RESPONSE TRAINING GROUPS

A. Local Medical Support Personnel

Selected local Medical Support Personnel are offered annual training in the following areas as specified in the EPTPD:

1. basic radiation protection,
2. personnel and equipment decontamination,
3. use of radiation instruments,

4. establishing radiation and contamination control areas,
5. biological sampling, and
6. plant access and reporting requirements.

B. State and Local Governments

Annually (defined as per calendar year), selected state and local emergency response personnel will be offered training in the following areas as specified in the EPTPD:

1. emergency classification system and EALs,
2. off-site dose projection methodology,
3. plant protective action recommendation criteria and its relationship to plant conditions, and
4. plant access and reporting requirements.

These officials will also be provided instructions concerning the operation of the EOF/RC. These state and local officials will be requested to participate in the biennial emergency exercise (SSCA 0539 and SSCA 0618).

C. Local Fire Department

1. The Vernon fire department shall annually be trained in the following areas:
 - a. plant layout and fire hazards,
 - b. basic radiation protection needed for fire fighting,
 - c. fire protection system orientation, and
 - d. plant access and reporting requirements.
2. Other Southwestern Fire Mutual Aid District fire departments within the VY 10 mile EPZ are annually offered training in the above mentioned areas.

FINAL CONDITIONS

1. All training attendance will be documented in accordance with AP 0700.
2. All documentation will be retained in accordance with AP 6807.

REVISED PROCEDURE CONTROL FORM

PART 1 - Initiation

A. Procedure No. OP 3712	New Revision No. 17	Title Emergency Plan Training	
B. Review Criteria: <input type="checkbox"/> Partial <input type="checkbox"/> Editorial <input checked="" type="checkbox"/> Complete		C. Periodic Review Cycle: <input checked="" type="checkbox"/> 2 Year (Event Driven) <input type="checkbox"/> N/A	
D. List DIs & LPCs:			
E. Description and Reasons for Procedure/Changes: <ul style="list-style-type: none"> • Referenced the EPTPD as containing specific training requirements for the ERO. • Identified the EP Training Coordinator's responsibilities. • Redefined the Director of PA responsibilities for training news media. • Removed those groups of personnel that were previously not covered by the EPTPD and are now covered from the procedure. 			
F. Originator Name: (App. A was used as references to create this revision, App. C is completed and attached unless Part 1.B above is "Editorial".) (Print/sign/date) Audra Williams <i>Audra Williams</i> 2/20/03			Telephone Extension: x4177

PART 2 - Reviews

A. Walk-Through Validation: <input type="checkbox"/> Required <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Field Walk-Through <input type="checkbox"/> Table-Top <input type="checkbox"/> Simulator Validation		B. Technical Verification Reviewer <input type="checkbox"/> N/A (App. B used as a reference) (Print/Sign/Date) <i>A.J. Flaherty</i> / 4/22/03	
C. Cross-Discipline Reviews: <input type="checkbox"/> N/A			
Department	Name	Signature	Date
Training	<i>George A. Silber</i>	<i>George A. Silber</i>	<i>3/3/03</i>
D. 50.59 Review Per AP 6002, Preparing 50.59 Evaluations <input type="checkbox"/> N/A <input type="checkbox"/> 50.59 AD previously performed and documented in the text of this procedure and is still applicable. <input checked="" type="checkbox"/> 50.59 Applicability Determination completed and attached; 50.59 Screening NOT required. <input type="checkbox"/> 50.59 Review Screening completed and attached, 50.59 Evaluation NOT required. <input type="checkbox"/> 50.59 Evaluation completed and attached.			
E. QUALIFIED REVIEWER: Use App. D as a reference (May perform 50.59 Applicability Determination) (Part 2.D) (Print/Sign/Date) <i>Audra Williams</i> <i>Audra Williams</i>			
F. ORIGINATOR: <input checked="" type="checkbox"/> Comments Resolved <input checked="" type="checkbox"/> Re-verify All DIs & LPCs Considered <input checked="" type="checkbox"/> Sent for Final Type (CDS or STC (SPs only)) Initial/Date <i>DWR</i> 4/2/03 <input checked="" type="checkbox"/> Proofread after Final Type (Print/Sign/Date) <i>Audra Williams</i> <i>Audra Williams</i>			

PART 3 - Training/Notification Requirements

A. Indicate training or notifications required to implement procedure: (Required for Administrative Procedures)

☐ Include in formal training (TCR submitted):

☒ E-Mail notification:

☐ Crew Briefings:

☐ Other:

☒ N/A

PART 4 - PORC

Plant Operation Review Committee: ☐ Required ☒ N/A

Meeting No:

PORC Secretary:

Date:

Plant Manager:

PART 5 - Approval

A. Responsible Procedure Owner: (Print/Signature/Date)

Brian M. Finn *Brian M. Finn* 4/22/03

B. Plant Manager (Print/Sign/Date) (For SPs Only)

C. Special Instructions: ☐ N/A

☐ Approved for Training

☒ Issue on DATE: 4.30.03

☐ Submit Surveillance Database Change per AP 4000

☐ Other:

PART 6 - Issuance

Procedure Change No.: 216

Date procedure issued: 4/30/03

Notes:

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 3712, Rev. 17, Emergency Plan Training

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

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

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 Appendix E, Section IV. F of Section A above, this change DOES NOT decrease the effectiveness of the Emergency Plan and DOES continue to meet the stated applicable standard or requirement.

BASIS FOR ANSWER:

The Emergency Planning Training Program Description has been completely revised to more clearly define training requirements for the ERO. Certain groups that were not previously covered in the EPTPD have been added to it and removed from procedure as an exception to the training program. Fire Brigade training was added to procedure and identified as being covered in AP 3700. This change is a major improvement to the procedure and to the Emergency Training Program and does not decrease the effectiveness of the EPlan 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: EPTPD

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: 2/20/03
(Print/Sign)

Reviewed By: Lori A. Tkaczuk *Lori A. Tkaczuk* Date: 2/28/03
(Emergency Plan Coordinator) (Print/Sign)

APPENDIX C CROSS-DISCIPLINE REVIEW CHECKLIST

Required to be completed for new procedures, procedure revisions, and
LPCs unless they are designated as Editorial.

Procedure Number/Revision OP 3712, Rev 17

Reviewer/Date (Print) Audra Williams 2/20/03

GENERAL REVIEW GUIDELINES/SPECIAL REVIEW REQUIREMENTS

- The Cross-Discipline Review Guidelines below constitute minimum review requirements; other reviews may apply.
- Determination of reviews should focus on *changes* made to a procedure and the potential impact of those changes on the affected group. Changes that are minimally or nonimpacting do not need review by the potentially affected group. If change impact is unclear, the procedure should be routed to the potentially affected group for review.
- New or revised Administrative or Program Procedures that significantly impact other departments, shall be reviewed by the appropriate Superintendent or Senior Manager. The PAA maintains a list of these Administrative and Program Procedures.
- ALL noneditorial changes to Special Process procedures (WP, NE, heat treating, etc.), including Vendor Procedures that address Special Processes, shall be reviewed by: a Welding Engineer (welding procedures) or a NDE Level III certified in the method addressed by the procedure (nondestructive examination procedures), AND the Quality Assurance Manager, AND submitted to the Authorized Nuclear Inservice Inspector (ANII) prior to use.
- A "YES" indicates that a Cross Discipline Review shall be done by the indicated Department. Document the review on VYAPF 0096.01, VYAPF 0097.01, or VYAPF 0097.02, as applicable.

	APPLICABLE	
	YES	NO
Chemistry: <ul style="list-style-type: none"> Potentially affects condensate, feedwater, or reactor water chemistry, or chemistry instruments. Procedures that implement the requirements of the VY Environmental Program. (see PP 7603, Appendix A) Produces/affects effluents or effluent monitoring (VY/QA 01-015). Affects NPDES limits or method of compliance. 		X
Maintenance (Mech, Elec, I&C): <ul style="list-style-type: none"> Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&TE, lifting and landing of leads and connectors. 		X
Operations: <ul style="list-style-type: none"> Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO. Requires Operations alignment/restoration of systems or components. Specifies surveillance or post maintenance testing by Operations. 		X
EOP/SAG Coordinator: <ul style="list-style-type: none"> Procedures that have the potential to affect the EOPs/SAGs. 		X

APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
Quality Assurance: <ul style="list-style-type: none"> Changes to procedures that implement the requirements of the VOQAM. (see PP 7802, Appendix B) New procedures that have a potential for reduction of VOQAM commitments. Obtain and attach a 10CFR50.54(a)(3) evaluation. 		X
Radiation Protection: <ul style="list-style-type: none"> Involves work in contaminated areas and high radiation areas. Involves work that breaches contaminated systems or components. Changes in radwaste or hazardous waste generation. 		X
Emergency Plan Coordinator: <ul style="list-style-type: none"> Emergency Plan Implementing Procedures. Obtain and attach a 10CFR50.54(q) Evaluation. Affects Emergency Plan personnel, facilities or equipment. 	X	
Software Quality Assurance Administrator <ul style="list-style-type: none"> Procedures that define how software is developed. 		X
Reactor Engineering: <ul style="list-style-type: none"> Could affect core reactivity, thermal power, reactor heat balance, or fuel integrity. Involves refueling operations. 		X
Systems/Project/Design Engineering: <ul style="list-style-type: none"> Maintenance Rule in-scope systems unavailability time. Involves infrequently performed test or evolution. Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO. Significant changes in system test or operation methodology. 		X
Appendix J Coordinator: <ul style="list-style-type: none"> Changes that affect App. J leakrates or containment boundaries, or boundary valve manipulation. 		X
Appendix R Coordinator: <ul style="list-style-type: none"> Appendix R implementing procedures. 		X
Environmental Qualification (EQ) Coordinator: <ul style="list-style-type: none"> Change in EQ test methodology or component lifetime. Potentially affects area EQ component environment. 		X
Fire Protection Coordinator (FPC): <ul style="list-style-type: none"> Fire Protection procedures. Affects fire loading Affects fire barrier integrity. Affects fire protection systems or component functionality. 		X
IST Program Coordinator: <ul style="list-style-type: none"> Inservice Testing Program implementing procedures. All surveillance procedures. 		X
ISI Program Coordinator: <ul style="list-style-type: none"> Inservice Inspection Program implementing procedures. 		X

APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
Setpoint Coordinator: <ul style="list-style-type: none"> Changes that impact setpoints, as-found/as-left tolerances, M&TE or testing methodology. 		X
Nuclear & PRA <ul style="list-style-type: none"> Potentially affects IPEEE or ORAM Sentinel Risk Models. Potentially affects plant SSCs reliability. Potentially affects Nuclear or Radiological Safety Analysis. 		X
Security: <ul style="list-style-type: none"> Procedures that implement the requirements of the VY Physical Security and Training and Qualification Plans. Changes that have a potential for reduction of the VY Physical Security and Training and Qualification Plan commitments. Obtain and attach a 10CFR50.54(P) Evaluation. 		X

APPLICABILITY DETERMINATION

Activity/Document Number: OP 3712

Revision Number: 17

Title: Emergency Plan Training

Provide or attach a brief description of activities (section 6.3 of RM):

- Referenced the EPTPD as containing specific training requirements for the ERO.
- Identified the EP Training Coordinator's responsibilities.
- Redefined the Director of PA responsibilities for training news media.
- Removed those groups of personnel that were previously not covered by the EPTPD and are now covered from the procedure.

Address the questions below for all aspects of the activity. If the answer is "YES" for any portion of the activity, apply the identified process to that portion of the activity. It is not unusual to have more than one process apply to a given activity. For example, a change to a door that is a fire door, a security door and a secondary containment door would require an evaluation to the Fire Protection license condition, 10CFR50.54 (p) and a 50.59 screen. See Section 4 of the "50.59 Resource Manual" (RM) for additional guidance.

I. Does the proposed activity involve a change to the:	Section 4.2.1 of the RM
1. Technical Specifications or Operating License (10CFR50.90)? Note that stand-alone changes to the TS Bases are evaluated in accordance with 10CFR50.59 per AP 0063.	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES process per AP 0063)
2. Quality Assurance Plan, related implementing procedures identified in PP 7802 or facility changes (10CFR50.54(a))?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES contact QA for 10CFR50.54(a)(3) assessment)
3. Security Plan, related implementing procedures or facility changes (10CFR50.54(p))?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES contact Security for 10CFR50.54(p) assessment)
4. Emergency Plan, related implementing procedures or facility changes (10CFR50.54(q))?	<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (If YES contact E-Plan for 10CFR50.54(q) assessment per AP 3532)
5. IST Program Plan, related implementing procedures or facility changes (10CFR50.55a(f))?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES, and a deviation from the code requirement is required, contact Licensing to ensure applicable NRC approval is obtained per AP 0058)
6. ISI Program Plan, related implementing procedures or facility changes (10CFR50.55a(g))?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES, and a deviation from the code requirement is required, contact Licensing to ensure applicable NRC approval is obtained per AP 0058)
7. Fire protection program, related implementing procedures or facility changes (License Condition 3.F)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (If YES provide an evaluation that satisfies License Condition 3.F)

II. Does the proposed activity involve:		Section 4.2.2 of the RM
1. Maintenance which restores SSCs to their original condition.	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES perform maintenance in accordance with plant procedures (e.g. AP 0021, AP 0049, AP 0050))
2. A temporary alteration supporting maintenance that will be in effect during at-power operations for 90 days or less that has been (or will be) evaluated under 10CFR50.65(a)(4) prior to implementation?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process in accordance with AP 0091.)
III. Does the proposed activity involve a change to the UFSAR (including documents <i>incorporated by reference</i>) excluded from the requirement to perform a 50.59 Review (NEI 96-07 or NEI 98-03)?		Section 4.2.3 of the RM (If YES, process FSAR change per AP 6036 "FSAR Revision Process". Include basis for excluding 10CFR50.59 evaluation below.)
IV. Does the proposed activity involve a change to the:		Section 4.2.4 of the RM
1. Managerial or administrative procedures governing the conduct of Facility operations, maintenance and training (subject to the control of 10CFR50, Appendix B) (RM section 4.2.4). Some procedures may be VOQAM implementing procedures requiring evaluation per 10CFR50.54(a)(3) (prompted above). Also, Maintenance procedure changes that include changes to Design Information, not evaluated under a design change process, shall be evaluated in accordance with 10CFR50.59	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process per procedure change process (e.g. AP 0095, AP 0096, AP 0097))
2. Regulatory commitment where changing commitment is not covered by another regulation based change process (NEI 99-04)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process per AP 0055 "Regulatory Commitment Management".)
V. Does the activity impact other plant specific programs (e.g., The ODCM and PCL RTP controlled per TS 6.7 and the PCP controlled per TRM Section 6) which are controlled by regulations, the Operating License, the Technical Specifications or TRM ?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES process per the procedure(s) for the appropriate activity.)
VI. Is the activity covered by any other specific regulatory change process not discussed above that would preclude the need to evaluate under 10CFR50.59 ? (e.g., 10CFR50.46 for changes to ECCS models and PCT changes, 10CFR50.12 for Exemption Requests, etc)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES document below and process per applicable regulatory requirements.)
VII Does the activity require a 50.59 Screen based on the following Generic NRC correspondence? GL 95-02 for performing Analog-to-Digital upgrades, IEB 80-10 for Contamination of non-radioactive systems, IEC 80-18 for changes to radioactive waste systems and GL 91-18 for compensatory actions including using manual actions in-lieu of automatic actions or use-as-is dispositions affecting the FSAR. GL 95-02 assessments need to look at both system and component level failures (ER20000558_01)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	(If YES complete 50.59 Screen for the subject activity.)

☒ All aspects of the activity are controlled by one or more of the processes above, therefore a 50.59 Screen is not required. If checked, provide any additional comments below and sign and date below.

☐ Any portion of the activity is not controlled by one or more of the processes above, therefore a 50.59 Screen or 50.59 Evaluation is required. If, checked, provide any additional comments below, sign and date below and complete 50.59 Screen for identified activities.

Additional Applicability Considerations:

Applicability Signoffs: Preparer: Audra Williams Audra Williams Date: 2/20/03
(Print name) (Sign)

Reviewer: Lori A. Tkaczuk Lori A. Tkaczuk Date: 2/28/03