



Entergy Nuclear Northeast  
Vermont Yankee  
P.O. Box 0500  
185 Old Ferry Road  
Brattleboro, VT 05302-0500  
Tel 802 257 5271

November 19, 2003  
BVY 03-103

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

OP 3505, Rev. 25  
OP 3531, Rev. 17  
OP 3540, Rev. 3, LPC#1  
OP 3545, Rev. 2, LPC#1

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

AD45

## **E-Plan Implementing Plant Procedures**

To: E-Plan Implementing Procedure Controlled Set Holders  
From: Technical Support - DCC - Denise WR Rumrill  
Date: 11/19/03  
Re: Entergy Vermont Yankee Emergency Plan Implementing Procedure Change 222,  
Instruction Sheet

A new Table of Contents is included.

### **REVISIONS:**

The following Revs should replace the appropriate procedures:

#### **Proc/Rev #**

#### **Procedure Title**

OP 3505/25

Emergency Preparedness Exercises and Drills

OP 3531/17

Emergency Call-In Method

### **LPCs:**

The following LPC should be incorporated into the appropriate procedures:

#### **Proc/Rev #**

#### **LPC #**

#### **Procedure Title**

OP 3540/3

1

Control Room Actions During an Emergency

OP 3545/2

1

Activation of the EOF/RC

Vermont Yankee Emergency Plan Implementing Procedures				
Table of Contents				
November 19, 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	2	"Reference"
Emergency Preparedness Exercises and Drills	OP 3505	Rev. 25		"Information"
Emergency Equipment Readiness Check	OP 3506	Rev. 43	1	"Reference"
Emergency Radiation Exposure Control	OP 3507	Rev. 30		"Reference"
On-Site Medical Emergency Procedure	OP 3508	Rev. 24		"Reference"
Environmental Sample Collection During an Emergency	OP 3509	Rev. 18		"Reference"
Off-Site and Site Boundary Monitoring	OP 3510	Rev. 27	1	"Reference"
Off-Site Protective Action Recommendations	OP 3511	Rev. 13		"Reference"
Evaluation of Off-Site Radiological Conditions	OP 3513	Rev. 22		"Reference"
Emergency Actions to Ensure Initial Accountability and Security Response	OP 3524	Rev. 20		"Reference"
Radiological Coordination	OP 3525	Rev. 11		"Reference"
Emergency Call-In Method	OP 3531	Rev. 17		"Reference"
Emergency Preparedness Organization	AP 3532	Rev. 11		"Information"
Post Accident Sampling of Reactor Coolant	OP 3533	Rev. 6	2	"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. 2		"Continuous"
Control Room Actions During an Emergency	OP 3540	Rev. 3	1	"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	1	"Reference"
Activation of the Emergency Operations Facility/Recovery Center (EOF/RC)	OP 3545	Rev. 2	1	"Reference"
Operation of the Emergency Operations Facility/Recovery Center (EOF/RC)	OP 3546	Rev. 4		"Reference"
Security Actions During an Emergency	OP 3547	Rev. 2		"Reference"
Emergency Plan Training	OP 3712	Rev. 17		"Information"

# REVISED PROCEDURE CONTROL FORM

## PART 1 - Initiation

A. Procedure No. OP 3505	New Revision No. 25	Title Emergency Preparedness Exercises and Drills	
B. Review Criteria:	<input type="checkbox"/> Partial <input checked="" type="checkbox"/> Complete	<input type="checkbox"/> Editorial	C. Deleted
D. List DIs & LPCs: #1 & #2			
<b>E. Description and Reasons for Procedure/Changes:</b> <ul style="list-style-type: none"> <li>UND-2003-370_02: Discussion section – added security drill to plant management options for drills. Added VYOPF 3505.07-Security Drill Planning Form. Added Security Drills to Section B. Drills.</li> <li>Recommendation #2002-023-10: Added step to include a formal written evaluation of drills/exercises, added Appendix E as a sample format.</li> <li>Added OP 3508 to the references. Title changes throughout. Added VYOPF 3505.08 – VY PI Evaluation Form</li> <li>ER-2001-1942_02: <ul style="list-style-type: none"> <li>Precautions/Limitations – defined when to use "This is a Drill" when communicating.</li> <li>Added to Procedure A. NOTE: Quarterly drills will be conducted between biennial exercises.</li> <li>Specified that the Emergency Planning Oversight Committee approves the dates for upcoming drills/exercises prior to the start of each calendar year. Outlined when the committee meets.</li> <li>Combined the Support Group and Scenario Development group into one group.</li> <li>Added formality to the Controller group responsibilities.</li> <li>Eliminated the Director of Public Affairs from responsibilities as this position no longer oversees EP.</li> <li>Combined the EP Liaison position with the EP Drill/Exercise Coordinator position.</li> </ul> </li> <li>ER-2003-1820_01 - Added AppG - drill/exercise closeout checklist</li> </ul>			
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".)	Telephone Extension:
(Print/sign/date) Audra Williams		<i>Audra Williams</i>	9/26/03 4177

## PART 2 - Reviews

A. Walk-Through Validation: <input type="checkbox"/> Required <input checked="" type="checkbox"/> N/A		B. Technical Verification Reviewer <input type="checkbox"/> N/A	
<input type="checkbox"/> Field Walk-Through <input type="checkbox"/> Table-Top <input type="checkbox"/> Simulator Validation		(App. B used as a reference) (Print/Sign/Date) <i>Lori A. Tkaczuk Lori A. Tkaczuk</i> 10/01/03	
C. Cross-Discipline Reviews:		<input checked="" type="checkbox"/> N/A	
Department	Name	Signature	Date
D. 50.59 Review Per AP 6002, Preparing 50.59 Evaluations		<input type="checkbox"/> N/A	
<input checked="" type="checkbox"/> 50.59 AD previously performed and documented in the text of this procedure and is still applicable. <input 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) Audra Williams		<i>Audra Williams</i>	9/26/03

### NOTE

During the revision of an existing procedure, any return to DCC for additional processing beyond 3 iterations requires approval by the Superintendent Technical Support.

F. ORIGINATOR: ☒ Comments Resolved ☒ Re-verify All DIs & LPCs Considered  
☒ Sent for Final Type (CDS or STC (SPs only)) Initial/Date \_\_\_\_\_  
☒ Proofread after Final Type  
(Print/Sign/Date) *Audra Williams Audra Williams 11.12.03*

### 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: *to E-Plan*

☐ Crew Briefings:

☐ Other:

*AW*  
☒ 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 Finn

*Brian M. Finn 11/13/03*

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

N/A

C. Special Instructions: ☐ N/A

☐ Approved for Training

☒ Issue on DATE: 11/19/03

☐ Submit Surveillance Database Change per AP 4000

☐ Other:

### PART 6 - Issuance

Procedure Change No.: *222*

Date procedure issued: *11/19/03*

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 3505, Rev. 25

Reviewer/Date (Print) Audra Williams 9.26.03

### 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
<b>Chemistry:</b> <ul style="list-style-type: none"> <li>Potentially affects condensate, feedwater, or reactor water chemistry, or chemistry instruments.</li> <li>Procedures that implement the requirements of the VY Environmental Program. (see PP 7603, Appendix A)</li> <li>Produces/affects effluents or effluent monitoring (VY/QA 01-015).</li> <li>Affects NPDES limits or method of compliance.</li> </ul>		X
<b>Maintenance (Mech, Elec, I&amp;C):</b> <ul style="list-style-type: none"> <li>Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&amp;TE, lifting and landing of leads and connectors.</li> </ul>		X
<b>Operations:</b> <ul style="list-style-type: none"> <li>Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO.</li> <li>Requires Operations alignment/restoration of systems or components.</li> <li>Specifies surveillance or post maintenance testing by Operations.</li> </ul>		X
<b>EOP/SAG Coordinator:</b> <ul style="list-style-type: none"> <li>Procedures that have the potential to affect the EOPs/SAGs.</li> </ul>		X

<b>Quality Assurance:</b> <ul style="list-style-type: none"> <li>Compliance with QA Program requirements cannot be readily determined by the Qualified Reviewer.</li> </ul>		X
<b>Radiation Protection:</b> <ul style="list-style-type: none"> <li>Involves work in contaminated areas and high radiation areas.</li> <li>Involves work that breaches contaminated systems or components.</li> <li>Changes in radwaste or hazardous waste generation.</li> </ul>		X
<b>Emergency Plan Coordinator:</b> <ul style="list-style-type: none"> <li>Emergency Plan Implementing Procedures.</li> <li>Obtain and attach a 10CFR50.54(q) Evaluation.</li> <li>Affects Emergency Plan personnel, facilities or equipment.</li> </ul>	X	
<b>Software Quality Assurance Administrator</b> <ul style="list-style-type: none"> <li>Procedures that define how software is developed.</li> </ul>		X
<b>Reactor Engineering:</b> <ul style="list-style-type: none"> <li>Could affect core reactivity, thermal power, reactor heat balance, or fuel integrity.</li> <li>Involves refueling operations.</li> </ul>		X
<b>Systems/Project/Design Engineering:</b> <ul style="list-style-type: none"> <li>Maintenance Rule in-scope systems unavailability time.</li> <li>Involves infrequently performed test or evolution.</li> <li>Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO.</li> <li>Significant changes in system test or operation methodology.</li> </ul>		X
<b>Appendix J Coordinator:</b> <ul style="list-style-type: none"> <li>Changes that affect App. J leakrates or containment boundaries, or boundary valve manipulation.</li> </ul>		X
<b>Appendix R Coordinator:</b> <ul style="list-style-type: none"> <li>Appendix R implementing procedures.</li> </ul>		X
<b>Environmental Qualification (EQ) Coordinator:</b> <ul style="list-style-type: none"> <li>Change in EQ test methodology or component lifetime.</li> <li>Potentially affects area EQ component environment.</li> </ul>		X
<b>Fire Protection Coordinator (FPC):</b> <ul style="list-style-type: none"> <li>Fire Protection procedures.</li> <li>Affects fire loading</li> <li>Affects fire barrier integrity.</li> <li>Affects fire protection systems or component functionality.</li> </ul>		X
<b>IST Program Coordinator:</b> <ul style="list-style-type: none"> <li>Inservice Testing Program implementing procedures.</li> <li>All surveillance procedures.</li> </ul>		X
<b>ISI Program Coordinator:</b> <ul style="list-style-type: none"> <li>Inservice Inspection Program implementing procedures.</li> </ul>		X

<b>Setpoint Coordinator:</b> <ul style="list-style-type: none"> <li>Changes that impact setpoints, as-found/as-left tolerances, M&amp;TE or testing methodology.</li> </ul>		X
<b>Nuclear &amp; PRA</b> <ul style="list-style-type: none"> <li>Potentially affects IPEEE or ORAM Sentinel Risk Models.</li> <li>Potentially affects plant SSCs reliability.</li> <li>Potentially affects Nuclear or Radiological Safety Analysis.</li> </ul>		X
<b>Security:</b> <ul style="list-style-type: none"> <li>Procedures that implement the requirements of the VY Physical Security and Training and Qualification Plans.</li> <li>Changes that have a potential for reduction of the VY Physical Security and Training and Qualification Plan commitments.</li> <li>Obtain and attach a 10CFR50.54(P) Evaluation.</li> </ul>		X
<b>MOV Program Coordinator:</b> <ul style="list-style-type: none"> <li>Potentially affects system parameters for which MOV operation has been evaluated.</li> </ul>		X
<b>AOV Program Coordinator:</b> <ul style="list-style-type: none"> <li>Potentially affects system parameters for which AOV operation has been evaluated.</li> </ul>		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 3505, Rev. 25, Emergency Preparedness Exercises and Drills

### 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 10CFR50.47(b):

- |      |   |
|------|---|
| (1)  | Assignment of Emergency Response Organization responsibilities                                |
| (2)  | Assignment of on-shift Emergency Response Organization personnel                              |
| (3)  | Arrangements for Emergency Response Support and Resources                                     |
| (4)  | Emergency Classification and Action levels, including facility system and effluent parameters |
| (5)  | Notification Methods and Procedures   |
| (6)  | Emergency Communications among principal response organizations and the public                |
| (7)  | Public Education and Information  |
| (8)  | Adequacy of Emergency Facilities and Equipment  |
| (9)  | Adequacy of Accident Assessment methods, systems and equipment                                |
| (10) | Plume exposure pathway EPZ protective actions   |
| (11) | Emergency Worker Radiological Exposure Control  |
| (12) | Medical Services for contaminated injured individuals   |
| (13) | Recovery and Reentry Plans  |
| (14) | Emergency response periodic drills and exercises  |
| (15) | Radiological Emergency Response Training  |
| (16) | Plan development, review and distribution   |

YES	NO
-----	----

	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
X	
	X
	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 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

YES	NO
-----	----

	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 10CFR50.14 and Appendix E, Section IV. G 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:

The procedure formalized that quarterly drills will be conducted between biennial exercises. The rest of the changes to procedure add formality and better define the responsibilities of the EP positions and the committees/groups involved with preparing and running drills and exercises. Per the ICM, the integration of security and e-plan drills has been added and how they are to be conducted.

To help formalize the comments from drills and exercises, a sample of a written formal de-brief of the drill/exercise was added to the procedure and is required to be completed for every drill/exercise. Also, a form identifying Performance Indicators was added to the procedure to formalize the method of providing the drill/exercise performance indicator information to the EP On-site Coord.

All of the above changes enhance and formalize the procedure. None of these changes decrease the effectiveness of the Emergency Plan and it continues to meet all 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 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: \_\_\_\_\_

- ☐ 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: No impact

Additional Comments:

Prepared By: Audra Williams Audra Williams Date: 9/26/03  
(Print/Sign)

Reviewed By: Lori A. Tkaczyk Lori A. Tkaczyk Date: 10/10/03  
(Emergency Plan Coordinator) (Print/Sign)

VERMONT YANKEE NUCLEAR POWER STATION

**OPERATING PROCEDURE**

OP 3505

REVISION 25

**EMERGENCY PREPAREDNESS EXERCISES AND DRILLS**

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

LPC No.	Effective Date	Affected Pages

**Implementation Statement:** N/A

Issue Date: 11/19/03

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## PURPOSE

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

## DISCUSSION

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

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

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

The Emergency Planning Drill/Exercise Coordinator (EPDEC) plans the Emergency Preparedness Drill/Exercise. The Emergency Planning Drill/Exercise Coordinator will be assisted by plant personnel in preparing and conducting drills. Off-site agencies will be contacted to inform them of the proposed exercise/date and to determine their degree of participation.

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

Weaknesses and deficiencies, identified by controllers during drills and exercises, are documented as specified in this procedure. A formal written evaluation will be completed for each drill/exercise using Appendix E as an outline.

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 procedure scope is not changed. 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.  | Table 1       | Generic Reminder List of Scenario-Related Items for the Drill/Exercise Coordinator |
| 2.  | Figure 1      | Simulator/Plant Gai-Tronics Link   |
| 3.  | VYOPF 3505.01 | Emergency Preparedness Drill/Exercise Planning Form                                |
| 4.  | VYOPF 3505.02 | Emergency Drill/Exercise Controller's Evaluation Form                              |
| 5.  | VYOPF 3505.03 | Medical Drill Planning Form  |
| 6.  | VYOPF 3505.04 | Deleted  |
| 7.  | VYOPF 3505.05 | Health Physics Drill Planning Form   |
| 8.  | VYOPF 3505.06 | Off-Site Participation Fire Drill Planning Form                                    |
| 9.  | VYOPF 3505.07 | Security Drill Planning Form   |
| 10. | VYOPF 3505.08 | Vermont Yankee Performance Indicator Evaluation Form                               |
| 11. | VYOPF 3505.09 | Drill/Exercise Security Agreement  |
| 12. | Appendix A    | Implementation of the Simulator/Plant Gai-Tronics Link                             |
| 13. | Appendix B    | Sample Ground Rules  |
| 14. | Appendix C    | Sample Punchlist   |
| 15. | Appendix D    | Sample Drill/Exercise Manual Outline   |
| 16. | Appendix E    | Drill/Exercise Report Outline  |
| 17. | Appendix F    | Drill/Exercise Scenario Package Development Checklist                              |
| 18. | Appendix G    | Drill/Exercise Closeout Checklist  |

## QA REQUIREMENTS CROSS REFERENCE

1. None

## REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
  - a. Vermont Yankee Emergency Plan
2. Codes, Standards and Regulations
  - a. 10CFR50.47, 10CFR50.54(q), and 10CFR50 Appendix E
  - b. NUREG 0654
3. Commitments
  - a. EPEX93SC3CPE1
  - b. EPEX93SC2CPE1
  - c. INF89046
  - d. AUDITRPT 2000-1407\_00 (VYOPF 3505.02)

#### 4. Supplemental References

- a. AP 0009, Event Reports
- b. AP 0028, Commitment Tracking
- c. OP 3506, Emergency Equipment Readiness Check
- d. OP 3508, On-Site Emergency Medical Procedure
- e. OP 3531, Emergency Call-In Method
- f. AP 3700, Fire Training
- g. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

#### PRECAUTIONS/LIMITATIONS

- 1. All announcements and non-face-to-face communications associated with emergency drills and exercises will include the words "THIS IS A DRILL, THIS IS A DRILL" before and after the message body.
- 2. During a simulated accident, no action to materially alter the plant operating conditions are permitted unless previously authorized in writing by the General Manager.
- 3. An emergency exercise or drill can be terminated by the Shift Manager or higher management at any time actual plant operational conditions warrant termination (i.e., fire, medical emergency, security event, etc.).
- 4. Proper radiation protection controls must be maintained and adhered to during drills and exercises.

#### PREREQUISITES

- 1. Emergency Preparedness drill/exercise dates will be established with the approval of Entergy Vermont Yankee Management in accordance with this procedure.
- 2. Before initiating a full or partial participation Emergency Preparedness Drill/Exercise, all applicable off-site agencies are made cognizant by the Emergency Planning Manager or designee of the intended drill/exercise and a determination made as to their degree of participation. (Refer to VYOPF 3505.01 Emergency Preparedness Drill/Exercise Planning Form.)
- 3. Before initiating a full or partial participation Emergency Preparedness Drill/Exercise, the Emergency Planning Manager verifies the contents of those letters of agreement (which are maintained in Appendix E of the Vermont Yankee Emergency Plan) are still valid (refer to VYOPF 3505.01 Emergency Preparedness Drill/Exercise Planning Form).



## PROCEDURE

### A. Emergency Preparedness Drill/Exercise

#### NOTE

A full participation exercise shall be conducted every two years. Quarterly drills will be conducted between biennial exercises. State and off-site agencies may be invited to participate in drills if desired by the Emergency Planning Oversight Committee.

#### 1. Working Drill/Exercise Groups

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

1) Emergency Planning Oversight Committee

- a) This group has policy level, broad oversight, and decision-making responsibilities associated with Emergency Planning drills and exercises, and is made up of the following members:
- Site Vice President, ENNE Vermont Yankee
  - General Manager, ENNE Vermont Yankee
  - Director of Nuclear Safety
  - Emergency Planning Manager
  - Training Manager
  - Emergency Planning Drill/Exercise Coordinator
- b) Members of this group have the authority to commit resources from the ENNE organization for support. Members of this group will not be allowed to have access to scenario information other than objectives and other information available to participants, such as extent of play, if they will be a player in the exercise or drill.
- c) This group may delegate responsibilities as defined in Section 2 of this procedure to other individuals as warranted.
- d) This group approves the drill and exercise dates proposed by the Emergency Planning Department prior to the start of each calendar year.

e) This group advises the EPDEC and EPM on the following:

- Drill or exercise objectives
- Drill or exercise scope
- Integration of VY, State and off-site organization objectives and activities for drills and exercises
- Other Emergency Planning issues deemed relevant by group membership

f) This group will meet at least twice a year and, if feasible, quarterly.

- Meeting minutes with action items will be kept and distributed.
- An agenda for each meeting will be prepared by the EPDEC and distributed prior to each meeting.
- Prior to the start of each calendar year, the Committee will approve a drill and exercise schedule for the year, which will be published for site-wide dissemination by the Emergency Planning Department.

2) Drill/Exercise Planning and Development Group

- a) This group, led by the Emergency Planning Drill/Exercise Coordinator, consists of individuals from the ENNE VY staff. The EPDEC is responsible to assemble the group from various plant disciplines as delineated in section 2)c) below to assist in drill and exercise development. The EPDEC will request the assistance of the EPM and members of the Emergency Planning Oversight Committee if necessary to obtain the necessary support from ENNE VY staff.
- b) The responsibilities of the group will include, as a minimum, the following:
  - Establish and maintain drill prep schedules and punchlists to support scheduled drills and exercises.
  - Interface with off-site groups for preparation and conduct of the drill/exercise.
  - Prepare/conduct training and briefings for drill and exercise controllers.
  - Assemble drill/exercise manual using Appendix D as a guideline for content.
  - Brief and train NRC officials, as necessary.
- c) This group may consist of individuals selected from the following areas of expertise: (\* indicates area is required)
  - Operations\*
  - Reactor Engineering
  - Radiation Protection\*
  - Chemistry
  - Simulator\*
  - Security
  - Contracted support, as necessary
  - Operations Training Instructor(s)
  - Work Management or Control

d) The Development group has the following responsibilities:

(1) Prepares the scenario to satisfy exercise or drill objectives using Appendix D, Section 5.0 as a guideline. Items to be included, but not limited to:

(a) Initial Conditions

- Plant Conditions
- Weather Conditions
- Ongoing Plant Activities

(b) Exercise Sequence of Events

- Narrative of Event
- Malfunctions to Occur
- Reasonably Expected Actions
- Expected Event Classifications

(c) Scenario Timeline

- Graphic of Major Events

(2) Prepares radiological, plume, and operational data.

(3) Develops mini-scenarios and related mock-ups.

(4) Performing validation on the Control Room simulator with assistance of Operations crews.

(5) Determines plant activities.

e) Follow the guidance specified in Appendix F in preparing the scenario package materials.

3) Drill/Exercise Controller Group

- a) The EPDEC will serve as the Drill or Exercise Coordinator and be responsible for the overall conduct of the evolution. Generally, the Coordinator will be located in the Simulator Control booth during a drill or exercise to maintain oversight of the event.
- b) The EPDEC will assign lead controllers by ERO facility or function. Lead controllers are responsible for the drill/exercise conduct in their areas and report directly to the Drill or Exercise Coordinator. Lead controllers are also responsible for:
  - (1) Maintaining drill fidelity to the planned timeline as closely as possible and resolution of conflicts in their facility. They must contact the Drill or Exercise Coordinator before allowing any major deviations.
  - (2) They are also responsible for the facilitation of facility critiques after a drill or exercise is over.
  - (3) Collecting and processing controller evaluation forms and critique information prior to the overall critique with the Drill or Exercise Coordinator.
- c) This group consists of individuals who are made available by the ENNE VY management and who, under the direction of the Emergency Planning Drill/Exercise Coordinator, initiate and direct the events of the scenario and evaluate VY's ERO performance.

## 2. Individual Responsibilities

### a. Emergency Planning Manager

- 1) The Emergency Planning Manager has overall responsibility for the Emergency Preparedness Program which includes the Emergency Preparedness Drills/Exercises.
- 2) The Emergency Planning Manager is also responsible for following:
  - a) Ensure that all weaknesses and deficiencies from the drill/exercise critique are documented and resolved as outlined in Section C.
  - b) Maintain a long range plan of drill/exercise objectives for both utility and off-site organizations.
  - c) Ensure the off-site objectives, as well as the manner in which they are met, are presented to the Drill/Exercise Planning and Development Group.
  - d) Notify NRC Region I and Resident Inspector of the Emergency Preparedness Exercise date.

#### NOTE

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

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

"WITHHOLD ENCLOSURE FROM PUBLIC DISCLOSURE"
- g) Ensure that off-site controllers are provided as necessary.
- h) Ensure the drill or exercise punchlist is accurate and items are completed to support drill/exercise as necessary. (Appendix C)

- i) Approve and present to the Emergency Planning Oversight Committee a proposed drill and exercise schedule prior to the start of each calendar year.
- b. Emergency Planning Drill/Exercise Coordinator (EPDEC)
  - 1) The Emergency Planning Drill/Exercise Coordinator's responsibilities include the following:
    - a) Ensure for a successful drill and exercise through coordination of the activities of the Drill/Exercise Planning and Development Group and the Drill/Exercise Controller Group.
    - b) Prepare a proposed drill and exercise schedule for the EPM to present to the Emergency Planning Oversight Committee prior to the start of each calendar year. Coordinate this schedule with the LOR Training Coordinator, Work Management, and Simulator and Outages schedules.

**NOTE**

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

- c) Ensure the Drill/Exercise Planning and Development Group selects a simulated accident that tests the various elements of the Vermont Yankee Emergency Plan and its implementing procedures.
    - d) Prepare a list of all events, recognized by plant personnel, that would be accomplished in an actual emergency, but which are not carried out during the drill/exercise.
    - e) Obtain controllers to evaluate the performance of participating personnel and the adequacy of emergency facilities, equipment and procedures during the drill/exercise. Request assistance from EPM and Emergency Planning Oversight Committee, if necessary, to obtain support from ENNE staff to support drills and exercises.
    - f) Ensure controllers have had initial controller training as detailed in OP 3712.

- g) Ensure that assumed emergency conditions are translated into simulated instrument responses and information for use during the drill/exercise.
- h) Prepare a set of ground rules for conducting exercises and drills and exercises (see Appendix B).

**NOTE**

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

- i) Ensure an exempt list is prepared which defines non-players, including both VY and contractor personnel. This list shall be approved by the General Manager. After non-players are evacuated to a controlled location, they will be issued non-player badges, which must be worn for the duration of the drill/exercise.
- j) Prior to commencement of the drill/exercise, the Drill/Exercise Coordinator briefs the controllers on the following:
  - (1) their assignments, which includes providing all the information necessary to fulfill their roles,
  - (2) how to handle a Simulated Plant Process Computer System (SPPCS) loss at their Emergency Response Facility, and
  - (3) ensure that the Simulator Controller is prepared to brief the Simulator operating crew on how a simulator loss will be handled, and expectations of the crew members during this event.
- k) Issue VYOPF 3505.02, Emergency Drill/Exercise Controller's Evaluation Form as part of drill/exercise controller manuals.
- l) Review Table 1 for applicability of generic scenario related items.



- m) Immediately following the drill/exercise, discuss overall results with lead controllers prior to the scheduled critique.
- n) Conduct a drill/exercise critique with controllers.
- o) Ensure that the Plant Emergency Director who participates in a given Emergency Exercise be in attendance at the subsequent NRC debriefing.
- p) If the Simulator ERFIS is being used for the drill/exercise, do the following:
  - (1) Ensure that Vernon Process Computer Engineering and Simulator Technicians, at the appropriate time before the drill/exercise, enable the ERFIS mobile work stations in the TSC, EOF, Simulator, and ESC to receive and display drill/exercise simulated data.
  - (2) If during the course of the drill/exercise the TSC directs (procedurally) Vernon Process Computer Engineering to enable the ERDS data link with the NRC, ensure that the NRC is aware that forthcoming ERDS data are simulated.
  - (3) Ensure that appropriate signs are placed on ERFIS work stations indicating that stations are connected to the Simulated Plant Process Computer System (SPPCS) by Controller assigned to the area.
  - (4) When the drill/exercise is terminated, direct Vernon Process Computer Engineering staff and Simulator Technicians to do the following:
    - (a) Terminate link between the SPPCS and TSC, EOF, Simulator, and ESC mobile work stations, and reconnect these work stations to Plant ERFIS.
    - (b) Terminate the SPPCS data link with NRC.
- q) Designate a leader of the Drill/Exercise Planning and Development Group to assume the primary responsibilities for mini-scenario development, and who possesses experience with the areas which will be demonstrated in these mini-scenarios. This will typically be the OSC Lead Controller. (EPEX93SC2CPE1)

- r) If the Simulator is being used for the drill/exercise, request the Instrument & Controls Manager to implement Appendix A to establish the Simulator/Plant Gai-Tronics link for the duration of the drill/exercise.
- s) Assist in determining the off-site objectives for the drill/exercise for each state through active liaison with the States and FEMA.
- t) Ensure that appropriate off-site agencies are contacted prior to drill/exercise date to determine their degree of participation per VYOPF 3505.01, Emergency Preparedness Drill/Exercise Planning Form.
- u) Ensure that all Letters of Agreement stipulated in Appendix E of the Vermont Yankee Emergency Plan are current, by reviewing findings documented on VYOPF 3505.01, Emergency Preparedness Drill/Exercise Planning Form. If not current, make necessary update action.

## B. Drills

### 1. Medical Drills

- a. At least one drill in conjunction with off-site medical response personnel will be held annually with Medical Response Team participation. The intent of the drills is to evaluate the effectiveness of the Medical Team and off-site medical response personnel in responding to on-site medical emergencies utilizing OP 3508, On-Site Emergency Medical Procedure. This drill may be performed as part of the required annual emergency preparedness exercise, fire drill, or as a stand alone Medical Drill.
- b. The EPDEC and General Manager's designee develop a drill scenario. Utilize the Medical Drill Planning Form, VYOPF 3505.03, for Medical Drill planning and approval.
- c. The EPDEC contacts off-site medical response personnel (ambulance and hospital) to request their participation in the drill.
- d. The EPDEC briefs controllers on the drill and issues Emergency Drill/Exercise Controller's Evaluation Form, VYOPF 3505.02.
- e. The EPDEC conducts a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.
- f. All Emergency Drill/Exercise Controller's Evaluation Forms are collected by the EPDEC at the conclusion of the critique.

### 2. Health Physics Drills

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

**NOTE**

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

- b. In conjunction with the Chemistry Superintendent and the Radiation Protection Superintendent, the EPDEC directs the development of a drill scenario utilizing the Health Physics Drill Planning Form, VYOPF 3505.05.
  - c. The EPDEC briefs controllers on the drill and distributes Emergency Drill/Exercise Controller's Evaluation Form, VYOPF 3505.02.
  - d. The EPDEC conducts a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.
3. Radiological Monitoring Drills
- a. At least one drill is conducted each year to evaluate on-site and off-site collection and analysis of airborne sample media. This drill may be performed as part of the required Emergency Preparedness Drill/Exercise.

#### 4. Fire Drills

##### a. Plant's Fire Brigade

A number of drills are conducted annually to test and evaluate the response and training of the plant's fire brigade. These fire drills are conducted per AP 3700, Fire Training, and 10CFR50 Appendix R.

##### b. Local Fire Department Participation

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

- 1) The Fire Brigade Instructor (FBI) and EPDEC develop a drill scenario utilizing FBTPD, Appendix E, and VYOPF 3505.06, Off-Site Participation Fire Drill Planning Form. Ensure that the proper approval signatures are obtained on form prior to initiating drill.
- 2) The FBI and EPDEC briefs controllers on the drill and distributes Emergency Drill/Exercise Controller's Evaluation Form, VYOPF 3505.02 and FBTPD.
- 3) The FBI and EPDEC conduct a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.

#### 5. Security Drills

- a. A number of security drills are conducted annually to test and evaluate the training and response capabilities of the Security Force. These drills are conducted in accordance with DP 0853, Security Drills and Exercises. Security drills may be included with Emergency Preparedness drills.
- b. Local Law Enforcement informational sessions are provided on an annual basis, which includes any changes to site security procedures or emergency plan information.
- c. The Security Manager, EPDEC, or designee(s) contact Local Law Enforcement in reference to their participation in any on-site Security or Emergency Preparedness drills. (VYOPF 3505.07)

6. Communication Tests

- a. To ensure Emergency Communication Systems are operable between plant and off-site emergency response organizations, conduct Communication Tests as outlined below:
  - 1) Communication channels with state governments within the plume exposure pathway are tested monthly as per OP 3506, Emergency Equipment Readiness Check.
  - 2) Communications with State Emergency Operations Centers and field monitoring teams are conducted as part of the Emergency Preparedness Drill/Exercise.

7. Augmentation Tests/Drill

- a. Augmentation tests and drill are conducted to verify the adequacy of the Vermont Yankee emergency call-in method for emergency response personnel.
- b. Conduct the following tests or drill as outlined in OP 3531 to ensure that Table 8.4 of the Vermont Yankee Emergency Plan requirements are met:
  - 1) Weekly functional test of the beepers (performed by Security Shift Supervisor).
  - 2) Annual off-hours unannounced drill that estimates response time of emergency response organization personnel to their designated emergency response facility (performed by EP On-Site Coordinator).

C. Documentation of the Emergency Preparedness Drill/Exercise

1. Comments and recommendations identified on VYOPF 3505.02 are dispositioned, within 30 working days of the drill or exercise, as follows:
  - a. Emergency Planning Manager (EPM) shall ensure that items which warrant follow-up actions, are identified and tracked.
  - b. The Emergency Planning Drill/Exercise Coordinator (EPDEC) shall compile a written report using Appendix E as an outline.
2. Complete VYOPF 3505.07, Vermont Yankee Performance Indicator Evaluation Form for each drill/exercise and submit to Emergency Planning On-Site Coordinator.
3. All weaknesses and deficiencies are dispositioned per AP 0009.
4. Retain records in accordance with AP 6807.

FINAL CONDITIONS

1. Critiques will be held following all drills and exercises. A formal management debrief will be held following all graded exercises.
2. All emergency plan equipment used in drills or exercises has been inventoried and checked for operability as defined in OP 3506, Emergency Equipment Readiness Check. Any missing or non-operable equipment will be replaced as soon as possible or compensatory measures put in place.
3. All documented items requiring corrective action have been corrected or assigned per AP 0028.

TABLE 1

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

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

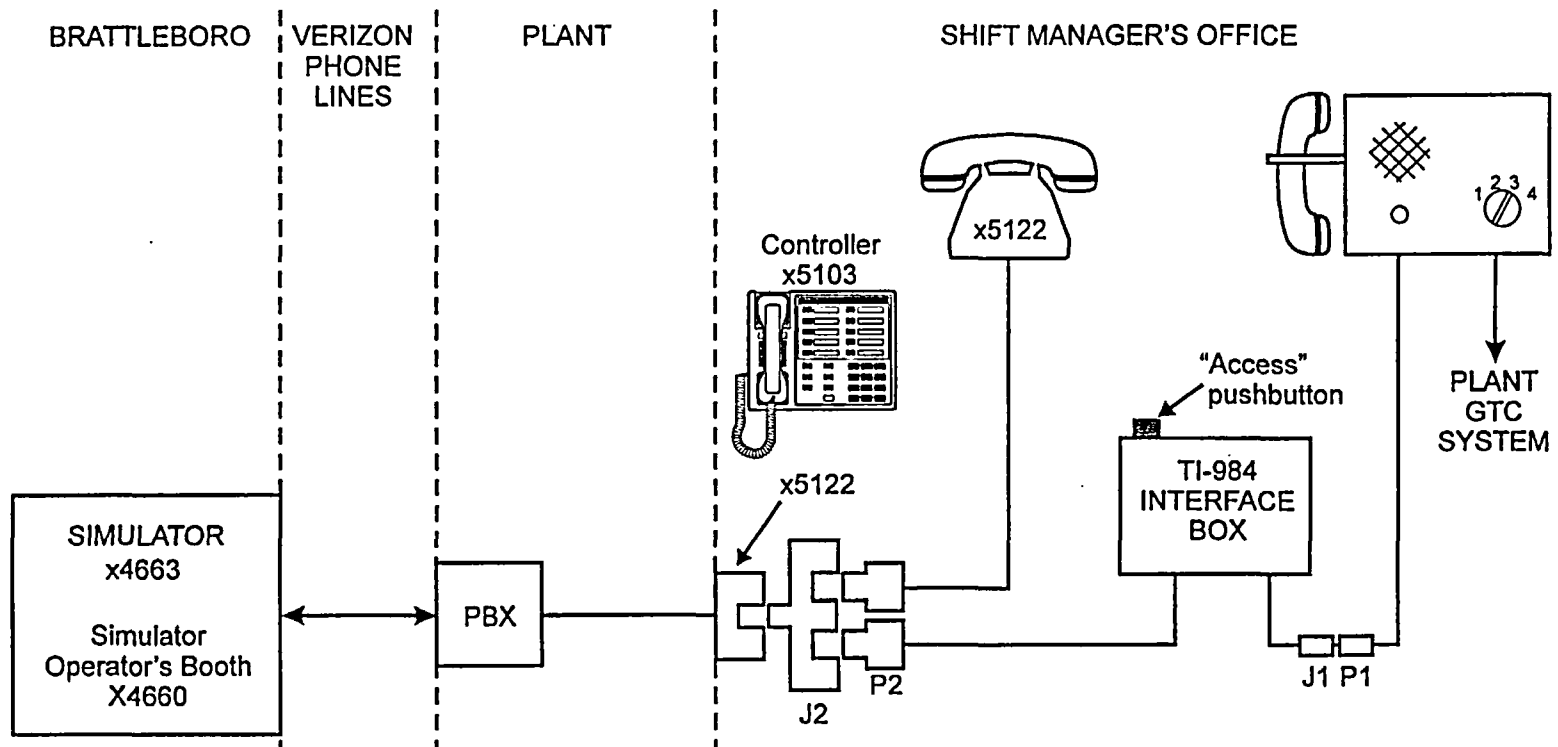


TABLE 1 (Continued)

14. Prepare command cards for use in the event that ERFIS is lost at any Emergency Response Facility.
15. Ensure that scenario-related radiological data for the Torus Room and RHR Corner Rooms (on & off), are available in consistent units measured by plant counting techniques and instrumentation.
16. Ensure that the following historical simulator fidelity problems will not be an issue for the planned scenario:
  - a. Secondary Containment model errors
  - b. Inaccurate area temperature data
  - c. Erroneous ARM data
  - d. Erroneous labels and pen colors in simulator
17. Ensure that Controllers involved with in-plant corrective action team efforts are adequately trained on their responsibilities and assignments for in-plant mini-scenario activities. This should include communication logistics and coordination to control and inform Controller Organization of ongoing in-plant corrective action team efforts being initiated and completed throughout the scenario.
18. If State representatives are participating at the EOF, ensure that Controllers are aware that EOF State activities should be allowed only after the EOF facility activation is initiated.
19. Ensure that notification and message forms to be used as part of the scenario located in the Simulator Control Room are stamped with "THIS IS A DRILL".
20. Ensure that Reactor Engineering information on the scenario-related reactor core and rod pattern sequence be included with the drill/exercise initial conditions.
21. Expectations on when players should be allowed to "play" following the distribution of drill/exercise initial conditions, should be defined and controlled.
22. Food should not be procured through normal emergency channels. Food will be pre-ordered for delivery during drill/exercise. Food distribution will be done in accordance with activation procedures.
23. Ensure that consideration has been given to PAR development and notification outside the 10-mile EPZ and, if this is part of objectives, determine whether or not this should be included as a Drill/Exercise Performance (DEP) Performance Indicator (PI) opportunity.
24. Ensure the NRC is notified, prior to the drill/exercise, if ERDS will be used.

FIGURE 1

SIMULATOR/PLANT GAI-TRONICS LINK



Using the Simulator/Plant Gai-Tronics Link

- Plant Gai-Tronics to Simulator Control Room
1. Page to Shift Manager's Office
  2. Dial Simulator Control Room (x4663)
  3. Push "Access" pushbutton on Interface Box

- Simulator Control Room to Plant Gai-Tronics
1. Dial Shift Manager's Office (x5122)
  2. Page Operator to Line 3
  3. Push "Access" pushbutton on Interface Box

*Temporary Modification for GTC to PBX Connection*

## EMERGENCY PREPAREDNESS DRILL/EXERCISE PLANNING FORM

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

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

Prepared by: \_\_\_\_\_ / \_\_\_\_\_  
EP Drill/Exercise Coordinator (print/sign) Date

Approved by: \_\_\_\_\_ / \_\_\_\_\_  
General Manager (print/sign) Date

EMERGENCY PREPAREDNESS DRILL/EXERCISE PLANNING FORM (Continued)

PRE-DRILL NOTIFICATION OF OFF-SITE AGENCIES:

- A. Yankee Mutual Assistance (Appendix A, DE&S Emergency Support Plan)  
Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_  
Degree of Participation: \_\_\_\_\_  
\_\_\_\_\_  
Initials: \_\_\_\_\_
- B. VT Emergency Management Agency  
Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_  
Degree of Participation/Agreement Letter Valid: \_\_\_\_\_  
\_\_\_\_\_  
Initials: \_\_\_\_\_
- C. VT Department of Health  
Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_  
Degree of Participation: \_\_\_\_\_  
\_\_\_\_\_  
Initials: \_\_\_\_\_
- D. MA Emergency Management Agency  
Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_  
Degree of Participation/Agreement Letter Valid: \_\_\_\_\_  
\_\_\_\_\_  
Initials: \_\_\_\_\_
- E. MA Radiation Control  
Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_  
Degree of Participation: \_\_\_\_\_  
\_\_\_\_\_  
Initials: \_\_\_\_\_
- F. New Hampshire Office of Emergency Management  
Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_  
Degree of Participation/Agreement Letter Valid: \_\_\_\_\_  
\_\_\_\_\_  
Initials: \_\_\_\_\_
- G. New Hampshire Department of Public Health Services  
Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_  
Degree of Participation/Agreement Letter Valid: \_\_\_\_\_  
\_\_\_\_\_  
Initials: \_\_\_\_\_

EMERGENCY PREPAREDNESS DRILL/EXERCISE PLANNING FORM (Continued)

H. ANI

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

I. Brattleboro Memorial Hospital

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

J. Rescue Inc.

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

K. Vernon Fire Department

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

L. NRC

1. I/E Region I

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

2. Senior Resident Inspector

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

M. FEMA Region I

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

EMERGENCY PREPAREDNESS DRILL/EXERCISE PLANNING FORM (Continued)

N. Franklin Medical Center

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

O. National Weather Service - Region I

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

P. Gouger's Market & Deli

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Contract Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

Q. Brattleboro Fire Department

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

R. Town of Vernon

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

S. Institute of Nuclear Power Operations

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

T. Yankee Nuclear Power Station

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

EMERGENCY PREPAREDNESS DRILL/EXERCISE PLANNING FORM (Continued)

U. Department of Energy

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

V. Framatome ANP DE&S (TLD Lab)

Person Contacted: \_\_\_\_\_ Date: \_\_\_\_\_

Degree of Participation (if required)/Agreement Letter Valid: \_\_\_\_\_

\_\_\_\_\_ Initials: \_\_\_\_\_

# EMERGENCY DRILL/EXERCISE CONTROLLER'S EVALUATION FORM

Controller's Name: \_\_\_\_\_ Drill/Exercise Date: \_\_\_\_\_

Drill/Exercise Title: \_\_\_\_\_

Controller's Location: \_\_\_\_\_

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

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

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Comments and Recommendations (Specific): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Potential Weaknesses: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## NOTE

Use additional pages as required.

Signature: \_\_\_\_\_

(print/sign)

Disposition: \_\_\_\_\_

Emergency Planning Review: \_\_\_\_\_ / \_\_\_\_\_

(print/sign)

Date



MEDICAL DRILL PLANNING FORM

Type of Drill: \_\_\_\_\_ Date of Drill: \_\_\_\_\_

Location of Drill: \_\_\_\_\_

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

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

Notification documentation should include the following:

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

8. Pre-Drill Notification of On-Site Personnel

- a. Site General Manager
- b. Emergency Planning Manager
- c. Supervisor, Safety and Fire
- d. Director of Nuclear Safety
- e. Radiation Protection Superintendent
- f. Operations Manager
- g. Security Operations Manager
- h. Director of Public Affairs
- i. NRC Resident Inspector

Notification documentation should include the following:

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

Prepared by: \_\_\_\_\_ / \_\_\_\_\_  
EP Drill/Exercise Coordinator (print/sign) Date

Approved by: \_\_\_\_\_ / \_\_\_\_\_  
General Manager (print/sign) Date

## HEALTH PHYSICS DRILL PLANNING FORM

Type of Drill: \_\_\_\_\_ Date of Drill: \_\_\_\_\_

Location of Drill: \_\_\_\_\_

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

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

Prepared by: \_\_\_\_\_ /  
EP Drill/Exercise Coordinator (print/sign) Date

Approved by: \_\_\_\_\_ /  
Chemistry Superintendent (print/sign) Date

Approved by: \_\_\_\_\_ /  
Radiation Protection Superintendent (print/sign) Date

OFF-SITE PARTICIPATION FIRE DRILL PLANNING FORM

Type of Drill: \_\_\_\_\_ Date of Drill: \_\_\_\_\_

Location of Drill: \_\_\_\_\_

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

1. Description of Drill which includes:
  - a. Prerequisites
  - b. Scenario Narrative Summary
  - c. Time Line With Detailed Sequence of Events
2. Special Hazards and Safety Precautions
3. List of Drill Controllers which includes each Controller's name, title and area assigned
4. Special Instructions to Controllers
5. Emergency Plan Implementing Procedures and Security Procedures to be tested
6. Pre-Drill Notification of Off-Site Agencies
  - a. Vernon Fire Department
  - b. Vernon Police Department
  - c. Brattleboro Fire Department
  - d. Southwest NH Fire Mutual Aid (SWNHFMA)

Notification documentation should include the following:

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

7. Pre-Drill Notification of On-Site Personnel

- a. Director of Public Affairs
- b. Operations Manager
- c. Security Operations Manager
- d. NRC Resident Inspector

Notification documentation should include the following:

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

Prepared by: \_\_\_\_\_ /  
Fire Brigade Instructor or EPDEC (print/sign) Date

Approved by: \_\_\_\_\_ /  
Fire Protection Engineer (print/sign) Date

Approved by: \_\_\_\_\_ /  
Emergency Planning Manager (print/sign) Date

Approved by: \_\_\_\_\_ /  
General Manager (print/sign) Date

SECURITY DRILL PLANNING FORM

Type of Drill: \_\_\_\_\_ Date of Drill: \_\_\_\_\_

Location of Drill: \_\_\_\_\_

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

1. Description of Drill which includes:

- a. Prerequisites
- b. Scenario Narrative Summary
- c. Time Line With Detailed Sequence of Events

2. Special Hazards and Safety Precautions

3. List of Drill Controllers which includes each Controller's name, title and area assigned

4. Special Instructions to Controllers

5. Emergency Plan Implementing Procedures and Security Procedures to be tested

6. Pre-Drill Notification of Off-Site Agencies (minimum 24-hour notification)

- a. Vernon Police Department
- b. Vermont Department of Homeland Security
- c. Vermont State Police - Brattleboro Barracks
- d. Vermont State Emergency Management
- e. Windham County Emergency Management

Notification documentation should include the following:

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

7. Pre-Drill Notification of On-Site Personnel

- a. Security Manager
- b. Supervisor, Safety and Fire
- c. Director of Public Affairs
- d. Operations Shift Manager

Notification documentation should include the following:

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

Prepared by: \_\_\_\_\_ / \_\_\_\_\_  
Security Coordinator or EPDEC (print/sign) Date

Approved by: \_\_\_\_\_ / \_\_\_\_\_  
Security Manager / Designee (print/sign) Date

Approved by: \_\_\_\_\_ / \_\_\_\_\_  
Emergency Planning Manager (print/sign) Date

Approved by: \_\_\_\_\_ / \_\_\_\_\_  
General Manager (print/sign) Date

# VERMONT YANKEE PERFORMANCE INDICATOR EVALUATION FORM

Date: _____			
<input type="checkbox"/> DRILL <input type="checkbox"/> EXERCISE		Evaluation for PI: <input type="checkbox"/> yes <input type="checkbox"/> no	
Team: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E			
<b>TSC/OSC</b>		<b>EOF/RC</b>	
TSC Coordinator: _____		SRM: _____	
OPS Coordinator: _____		EOF Coordinator: _____	
OSC Coordinator: _____		Rad Assistant: _____	
RP Coordinator: _____		Compliance Advisor: _____	
Maint Coordinator: _____		Ops Advisor: _____	
Rx Eng Coord: _____			
Chem Coordinator: _____			
Engineering Coordinator: _____			
Security Coordinator: _____			
Team (relief shift): <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E			
<b>TSC/OSC</b>		<b>EOF/RC</b>	
TSC Coordinator: _____		SRM: _____	
OPS Coordinator: _____		EOF Coordinator: _____	
OSC Coordinator: _____		Rad Assistant: _____	
RP Coordinator: _____		Compliance Advisor: _____	
Maint Coordinator: _____		Ops Advisor: _____	
Rx Eng Coord: _____			
Chem Coordinator: _____			
Engineering Coordinator: _____			
Security Coordinator: _____			

## VERMONT YANKEE PERFORMANCE INDICATOR EVALUATION FORM (Continued)

**Opportunity Summary:** *(NOTE: Classification & PAR Notification Form must be timely and completed accurately for a successful notification)*

☐ N/A    ☐ Unusual Event    UE Classification Opportunity Successful? ☐ yes ☐ no  
 Notification Opportunity Successful? ☐ yes ☐ no

☐ N/A    ☐ Alert    Alert Classification Opportunity Successful?    ☐ yes    ☐ no  
 Notification Opportunity Successful?    ☐ yes    ☐ no

☐ N/A    ☐ Site Area    Site Area Classification Opportunity Successful? ☐ yes ☐ no  
 Notification Opportunity Successful? ☐ yes ☐ no

☐ N/A    ☐ General    General Classification Opportunity Successful? ☐ yes ☐ no  
 Notification Opportunity Successful? ☐ yes ☐ no

PAR Opportunity Successful? ☐ yes ☐ no  
PAR Notification Successful? ☐ yes ☐ no

Additional PAR Opportunity Successful? ☐ yes ☐ no  
Additional PAR Notification Successful? ☐ yes ☐ no

<b>Totals:</b>	<b>Classifications</b>	<b>Notifications</b>	<b>PARs</b>
----------------	------------------------	----------------------	-------------

**Comments:** *(include explanations for all "no" answers above)*

[illegible]

Evaluation completed by: \_\_\_\_\_  
Emergency Planning Drill/Exercise Coordinator (Print/Sign)

Approved by: \_\_\_\_\_  
Emergency Planning On-Site Coordinator (Print/Sign)

### DRILL/EXERCISE SECURITY AGREEMENT

I acknowledge that I have acquired specialized knowledge about the **Vermont Yankee Emergency Preparedness Drill/Exercise Scenario** as of the date of my signature. I agree that I will not knowingly divulge any information about this scenario to any unauthorized persons including representatives of Entergy, the States of Vermont, New Hampshire and Massachusetts, the towns of Brattleboro, Dummerston, Guilford, Halifax, Vernon, Chesterfield, Hinsdale, Richmond, Swanzey, Winchester, Bernardston, Colrain, Gill, Leyden, Northfield, Warwick and Greenfield. I understand that I am not to participate in the drill/exercise, but may function as a controller and/or evaluator. I further understand that violation of the conditions of this agreement may result in the scenario being voided requiring a remedial drill/exercise to be conducted.

PRINTED NAME	SIGNATURE	DATE

# APPENDIX A

## IMPLEMENTATION OF THE SIMULATOR/PLANT GAI-TRONICS LINK

### Description

This appendix describes the process to temporarily (for drill/exercise purposes) establish a configuration which connects Line 3 of the Plant Gai-Tronics System to the Verizon telephone line (257-7711, ext. 5122) via a GTC Interface Box (TI-984).

### Impact on Operations

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

### Design Requirements

- Gai-Tronics TI-984 Interface Box
- Installed GTC desk set with existing connector
- RJ-11PBX connection (already installed at 257-7711, ext. 5122)

### Restoration Requirements

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

### Implementation (See Figure 1)

J or L	Drawing No.s	Location	Description	Installed By/Date Verified By/Date (print/sign)	Removed By/Date Verified By/Date (print/sign)
J	G191302	Control Rm. SS Office	J2 to P2 to Conn. TI-984 to PBX		
J	G191302	Control Rm. SS Office	J1 to P1 to Conn. TI-984 to GTC Conn.		
L	N/A	Main Gai-Tronics Junction in Cable Vault	Lift Line 3 Balance Resistor from Terminal 7 of Balance Resistor Terminal Board		

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

1. Upon completion of this form, forward to Emergency Planning Department for filing in accordance with AP 6807.



## APPENDIX B

### SAMPLE GROUND RULES Use as guidance for drills/exercises.

#### EMERGENCY PREPAREDNESS DRILL/EXERCISE GROUND RULES

##### Drill/Exercise Date

*Date of Drill/Exercise*

##### NOTE

There is no smoking, eating or drinking allowed outside or in the vicinity of the Admin building during the Drill/Exercise, from the Alert to Drill/Exercise termination.

##### Drill/Exercise Focus

- The (year) Emergency Plan Drill/Exercise is the opportunity for the Vermont Yankee Emergency Response Organization, to demonstrate with full involvement of the 3 Emergency Planning Zone states and local communities. There will be Federal participation by FEMA and the NRC at VY and the States. A formal de-brief will take place the following day at the Training Center. Framatome ANP DE&S ESC (including Site Responders) will not be participating in the Exercise.
- The Drill/Exercise also provides more Data collection points for input to the NRC Revised Oversight Process for Key Performance Indicators. Items to be documented are Drill Performance (event classification, notification of offsite authorities and development/notification of a PAR as required by scenario conditions) and ERO Participation (all "key" ERO staff participate in a drill or exercise over a 2 year period).

##### States/Local Participation

- The 3 States will be represented at our EOF and Joint News Center.
- The 3 State EOCs will be staffed to receive notifications and communicate with the VY EOF/JNC staff.

##### General Guidelines

If you have questions regarding player ground rules or guidelines, ask your supervisor or Emergency Planning staff.

**IF YOU HAVE QUESTIONS REGARDING SAFETY OR PLAYER ACTIONS  
DURING THE DRILL/EXERCISE, ASK YOUR CONTROLLER.**

## APPENDIX B (Continued)

### Important Reminders

The successful demonstration of our emergency preparedness capability will be a positive attribute for input into the revised NRC Oversight Process.

- Lunch will be provided for players and controllers and will be distributed in accordance with the Activation procedures. Lunches for Off-Site teams are to be picked up at Gate 1.
- All unassigned individuals (contractors, coops, etc.), at the plant site, will report to a controlled location until accountability has been completed. This includes those individuals working in the Plant Support and Power Uprate Buildings.
- Respond realistically to simulated scenario elevated radiation levels.
- Controllers are exempt from simulated radiation levels and other emergency conditions. Don't let their actions redirect your activities regarding simulated emergency conditions.
- Play out all actions, as much as possible, in accordance with procedures.
- *Before ERF activation, individuals that support the simulator operating crew (e.g., AOs, Communicators, etc.) will be pre-staged to facilitate exercise play and simulator related logistics.*
- VY pagers will be activated with drill code "000"- followed by the event code for the drill. Pager holders should respond to their assigned ERFs.
- Community Alert Network (CAN) will not be activated
- All exempt personnel must wear "Non-Player" badges (including contractors).
- Distribution and ingestion of Potassium Iodide (KI), if warranted, will be simulated. Charcoal cartridges will be used for off-site samples.
- Gai-Tronics Line 3 is reserved for communications between Simulator and Plant. Use lines 1 & 2 for all other drill communications.
- Personnel need to stop what they are doing and attentively listen to Drill Announcements.
- Don't forget the phrase "THIS IS A DRILL" when communicating drill related information. Ensure all Control Room Announcements begin with "This is a Drill" prior to sounding of alarms.
- DRILL GAMESMANSHIP: Remember to "STATE THE OBVIOUS" relative to actions and decisions.

## APPENDIX B (Continued)

- COMPLETE ALL PAPERWORK! (Fill out all documentation with accurate and complete information - DO NOT USE PENCIL.)
- During a drill, Controllers may take immediate corrective actions for an observed issue. No further corrective action will be required, but each issue should be included in the Controller's report. Immediately corrected issues will be documented in the corrective action system as a resolved item.
- Keep a list of suggestions for improvements/general comments. Provide to your facility coordinator or lead controller at the conclusion of the drill or during the critique. Controllers are required to collect and turn in all paperwork from the Drill/Exercise to the Emergency Planning Department.
- Facility Critique Sessions: To be held ~15 minutes after termination of the exercise. Players who had a major role in the exercise activities must attend - opportunity for both controllers and players to discuss issues while they are still fresh their minds.
- SCBA and Respirator expectations: required to demonstrate donning and removal, but are not required to wear during evolution unless directed by a controller or simulating Fire Brigade Duties.

## APPENDIX C

### SAMPLE PUNCHLIST

Use as guidance for planning and preparation of Drills/Exercises.

#### YEAR DRILL/EXERCISE PREPARATION ITEMS

	TASK	DUE DATE	RESP.	STATUS
1.	Create Scenario Development team	90	DEC	
2.	Develop Objectives/Extent of Play (review previous Drill/Exercise reports)	72	DEC	
3.	Determine State/local involvement	72	DEC	
4.	Obtain MGMT approval of objectives	72	DEC	
5.	Develop Scenario outline	60	DEC	
6.	Verify current training for participants	14	OC	
7.	Determine any out of sequence activities. Confirm with offsite organizations as necessary	90	DEC	
8.	Develop 1-line diagram of release pathway (if appropriate)	90	DEC	
9.	Replacement procedures procured for post Drill/Exercise normalization (EXTRA COPIES)	7	OC	
10.	Confirm On-site Controller Organization (Send out reminder notice on assignments and schedule for training & briefings)	49	DEC	
11.	Controller Organization and assignments with Lead State Controllers – Make of listing of the off-site organization for all three States	40	EPM	

Date

Page 1 of 9

Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for exercise/drill.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

# APPENDIX C (Continued)

	TASK	DUE DATE	RESP.	STATUS
12.	Confirm Rooms for Controller Briefing Meetings and all appropriate rooms for pre and post Drill/Exercise related activities.	90	EPM	
13.	Lunch/Food Arrangements – - Lead Controller Initial Mtg - OSC Controller Briefing - Full Controller Briefing - Final Lead Controller Mtg	60	EPA	
14.	ERO Lunches for Drill/Exercise -Plant -Corporate (Include State)	60	EPA	
15.	Arrange for Field Monitoring Team Lunches (deliver to GH1)	60	EPA	
16.	Name Tags: Ensure Availability, Distribute to Lead Controllers for appropriate distribution (Players & Controllers)	during all controller mtg	OC	
17.	Make Arrangements to conduct Mini-scenario activities defined in Sec 7.2 of Exercise/Drill manual. This should include any mockup of equipment needed and obtaining necessary resources to prepare and conduct mini-scenario activities.	14	DEC	
18.	Conduct OSC Controller Briefing on Mini-scenarios and In-plant activities	14	DEC	

Date

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Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

# APPENDIX C (Continued)

	TASK	DUE DATE	RESP.	STATUS
19.	Prepare agenda and assignments for Drill/Exercise Briefings + handouts  - Lead Controller Briefing - Lead Final Briefing - Full Controller Briefing	30	DEC	
20.	Ensure Controllers have VY Controller Logo shirts and are expected to wear on Drill/Exercise day. If necessary order more.	60	OC	
21.	Generate and issue Ground Rule Memo: (Present to Plant & Corp. Management)	14	DEC	
22.	Send out Drill/Exercise Exempt Memo and Generate Exempt List for Security accountability.	21	OC	
23.	Provide Security with exempt list.	1	OC	
24.	Arrange for Simulator Pre-staging: Ops Crew, RP, Chem, Communicator, Auto Ring-Down, RCE Alternate Communicator at Simulator.	30	DEC	
25.	Arrange for AO "Drill/Exercise" Crew pre-stage at plant to compliment Ops crew in Simulator	30	DEC	
26.	Confirm setup of Gai-Tronics interface between Simulator and Plant	30	OC	
27.	Arrange for Runners (COOPs); have present at Controller Briefing Meeting (1 plant & 1 corp)	30	OC	
28.	Arrange for one Co-op or extra personnel (not participating in Drill/Exercise) to take attendance. Provide attendance sheets to record drill/exercise participation at EOF/JNC.	30	OC	

Date

Page 3 of 9

Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

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# APPENDIX C (Continued)

	TASK	DUE DATE	RESP.	STATUS
29.	Brief Simulator CR Crew on expected conduct, especially if Simulator malfunctions etc.	day of	LEAD SIM	
30.	Brief Simulator Control Room Pre-stages prior to Drill/Exercise start, including Chem Communicator	day of	LEAD SIM	
31.	Confirm setup of Simulator SPPCS to drive TSC/EOF work stations in advance Establish "standby" technical person for Simulator driven SPPCS and fix SPPCS.	14	DEC	
32.	Determine if ERDS to be used. Confirm arrangements to activate ERDS through Simulator to allow the States to receive data stream via NRC.	7	DEC	
33.	Define & Confirm State Participation and who will attend at EOF & JNC (Memo to staff defining States' extent of play)	7	DEC	
34.	Set-up Lead Controller Phone System, distribute, phone #s (include RP unit in Simulator) and Lead Controller Phone List Directory	1	OC	
35.	FTS final status check, including the Simulator	7	EPA	
36.	Auto Ring down System Checkout	7	EPA	
37.	Conduct Housekeeping tours of facilities (Ensure all status boards, glass displays are wiped clean/in place).	7	EPA	
38.	Arrange Drill/Exercise day exterior communications coverage : Vernon & Bratt Tatro	21	EPA	
39.	Arrange for North MT. Radio coverage and all News Media and Vendors	21	EPA	
40.	Arrange for Security and provide training	21	EPA	

Date

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Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

# APPENDIX C (Continued)

	TASK	DUE DATE	RESP.	STATUS
41.	Provide Simulator Control Room phone number to be used for State call backs to Lead State Controllers (MA, NH, VT)	7	OC	
42.	Generate necessary News Media Public Inquiry Messages (VY and States)	7	OC	
43.	Generate necessary News Media Questions (VY and States)	10	OC	
44.	Arrange for Public Inquiry Callers (Re-train and brief individuals)	10	OC	
45.	Arrange and train Simulated Media	10	OC	
46.	Provide switchboard with updated Switchboard Guidelines	7	OC	
47.	Develop Off-site Exercise/Drill Manual for State of VT Controllers and State Field Monitoring Controllers (Large Maps with Data)	45	DEC	
48.	Pre-Drill/Exercise Clock Synchronization with SPPCS (Vernon & Bratt) and initial conditions distribution and start of "Drill/Exercise play" by players	day of	DEC	
49.	Provide STAMPED notification forms (THIS IS A DRILL) for Simulator - VYAPF 0156.01 and VYOPF 3540.06	2	OC	
50.	Submit completed VYOPF 3505.01 for Plant Mgrs. Approval. - EXERCISE ONLY	90	DEC	
51.	Make appropriate off-site agency notifications, and confirm E-Plan Letters of Agreement (refer to OP 3505). Document results on VYOPF 3505.01 - EXERCISE ONLY	90	DEC	

Date

Page 5 of 9

Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

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APPENDIX C (Continued)

	TASK	DUE DATE	RESP.	STATUS
52.	Ensure that SM/PED who participates in exercise attends NRC Exit Critique (3505 procedure requirement) – EXERCISE ONLY	7	DEC	
53.	Provide FEMA with directions to all off-site locations - EXERCISE ONLY	14	OC	
54.	Obtain list from FEMA of evaluators and assignments - EXERCISE ONLY	14	OC	
55.	Confirm arrangements of FEMA "Public Meeting" at Vernon Town Hall	10	DEC	
56.	Confirm pre-stage VY Liaisons at MA & NH EOCs and discuss expected role in that position	2	DEC	
57.	Reserve Field Monitoring Team cars with Security	30	OC	
58.	Copier for SRM/EOF area	30	EPA	
59.	Confirm NRC Inspection Team and schedule for NRC Entrance and Exit – EXERCISE ONLY	14	EPM	
60.	Ensure all Lead Controllers attend NRC Entrance Meeting – EXERCISE ONLY	1	EPM	
61.	Prepare and attend FEMA Exercise Briefing – EXERCISE ONLY	1	ALL	
62.	Prepare and Present Exercise Critique to VY Management and NRC – (Schedule time for Pre-presentation to VY Management) Need to confirm time and date of exit with NRC – EXERCISE ONLY	day after	ALL	
63.	Confirm State arrangements for out of sequence activities as defined in their objectives and extent of play – EXERCISE ONLY	21	EPM	

Date

Page 6 of 9

Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

# APPENDIX C (Continued)

	TASK	DUE DATE	RESP.	STATUS
64.	Arrange requested material for NRC Inspection Team – EXERCISE ONLY - Key VY Player list - Controller Organization list - Controlled copy of E-Plan and EPIPs - VY telephone directory ERF Footprints	30	EPM/OC	
65.	METPAC Training for State of Vermont Health Dept./Field Team Training – EXERCISE ONLY		Training	
66.	Spot check VT/NH/MA plans and procedures/ensure updated – EXERCISE ONLY	60	DEC	
67.	Prepare and present Drill/Exercise Critique to VY Management	day after	EPM/DEC	
68.	Notify (e-mail) SSS that during Drill/Exercise stray reporters may show up at the plant and that they should be directed to the JNC in Brattleboro	2	OC	

Date

Page 7 of 9

Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

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APPENDIX C (Continued)

**PLUME DRILL/EXERCISE SCENARIO MANUAL ITEMS**

	<b>TASK</b>	<b>DUE DATE</b>	<b>RESP.</b>	<b>STATUS</b>
A.	Develop Generic Drill/Exercise Manual Sections (Sec. 1-4)	120	DEC	
B.	Draft Drill/Exercise Timeline and Events (Section 5.0)	110	DEC	
C.	Run Scenario on Simulator	120	DEC	
D.	Draft Message Cards (Section 6.0)	110	DEC	
E.	Draft Drill/Exercise Mini-scenarios sections (Sections 7.1 & 7.2)	90	DEC	
F.	Draft Plant Ops Data Section 8 from Simulator run	110	DEC	
G.	Coordinate development of Section 9 and Section 10 of Drill/Exercise manual	90	DEC	
H.	Review Drill/Exercise Manual Package	90	ALL	
I.	Incorporate Drill/Exercise Manual comments	90	DEC	
J.	Assemble/Repro Manual for Distribution (order binders & tabs) for Controllers  EXERCISE ONLY – Copies for NRC Inspection Team/FEMA Evaluators	90	ALL	
K.	Distribute Manuals to VY Controllers	7	DEC	
L.	Generate Cue Cards for Drill/Exercise Manual:  OPS DATA (SEC 8.0) RAD DATA (SEC 9.1 & 9.2) SPCCS MET DATA (SEC 10) ESC MET DATA (SEC 10) CHEMISTRY DATA CARDS	90	DEC	

Date

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Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

# APPENDIX C (Continued)

	TASK	DUE DATE	RESP.	STATUS
M.	Review Simulator Malfunctions & Data: Check ARM & Process Monitor Readings Provide Met Data to be programmed into Simulator Info to drive necessary ARM & Process Monitor Readings	90	DEC	
N.	Generate Drill/Exercise Daily Plant Status Report for Plant AM Meeting	7	DEC	
O.	Present Drill/Exercise Plant Status Report to Plant Management Meeting on Drill/Exercise Day.	day of	DEC	
P.	Assemble Off-site Plume Manual for State of VT Controllers and Lead State NH and MA Controllers	80	EPM/OC	
Q.	Assemble and Prepare Large Offsite Field Monitoring Maps –VY and States	80	DEC	

Date

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Due date is number of days prior to the date of drill/exercise.

Responsibility is the E-Plan position that is assigned to the task. Use initials of personnel when initiating for drill/exercise.

DEC - Drill/Exercise Coordinator. OC - On-Site Coordinator. EPM - E-Plan Manager EPA - E-Plan Assist.

## APPENDIX D

### SAMPLE DRILL/EXERCISE MANUAL OUTLINE Use as guidance for planning and preparation of Drills/Exercises.

#### VERMONT YANKEE NUCLEAR POWER STATION EMERGENCY PREPAREDNESS DRILL/EXERCISE YEAR

##### TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Rev.</u>
1.0	<u>INTRODUCTION</u>	
1.1	Drill/Exercise Schedule	
1.2	Participating Centers/Agencies	
2.0	<u>DRILL/EXERCISE OBJECTIVES AND EXTENT OF PLAY</u>	
2.1	Vermont Yankee	
2.2	State of Vermont	
2.3	State of New Hampshire	
2.4	Commonwealth of Massachusetts	
3.0	<u>DRILL/EXERCISE GUIDELINES AND SCOPE</u>	
3.1	Drill/Exercise Guidelines and Ground Rules	
3.2	Procedure Execution List	
4.0	<u>CONTROLLER INFORMATION</u>	
4.1	Controller Assignments	
4.2	Controller Drill/Exercise Guidance	
4.3	Controller Evaluation Criteria	
5.0	<u>DRILL/EXERCISE SCENARIO</u>	
5.1	Initial Conditions	
5.2	Drill/Exercise Sequence of Events	
5.3	Scenario Timeline	

APPENDIX D (Continued)

VERMONT YANKEE NUCLEAR POWER STATION  
EMERGENCY PREPAREDNESS DRILL/EXERCISE  
YEAR

TABLE OF CONTENTS (continued)

<u>Section</u>	<u>Title</u>	<u>Rev.</u>
6.0	<u>DRILL/EXERCISE MESSAGES</u>	
6.1	Command Cards	
6.2	Message Cards	
7.0	<u>STATION EVENT DATA</u>	
7.1	Events Summary	
7.2	Event Mini-scenarios	
8.0	<u>OPERATIONAL DATA</u>	
9.0	<u>RADIOLOGICAL DATA</u>	
9.1	Area Radiation Monitors	
9.2	Process Monitors	
9.3	In-Plant Radiation Levels	
9.4	Plant Chemistry Data	
	9.4.1 Reactor Coolant Data	
	9.4.2 Primary Containment Data	
	9.4.3 Reactor Building Data	
9.5	Plant Stack Release Data	
9.6	Field Monitoring Maps and Data	
10.0	<u>METEOROLOGICAL DATA</u>	
10.1	On-Site Meteorological Data	
10.2	General Area NWS Forecasts	
11.0	<u>FINAL CONDITIONS</u>	

## APPENDIX E

### DRILL/EXERCISE REPORT OUTLINE

- |                  |  |
|------------------|--|
| <b>Section 1</b> | An executive summary of the drill/exercise including goals, participation, and an overall assessment.  |
| <b>Section 2</b> | A facility-by-facility assessment of ERO performance with respect to the drill/exercise objectives including strengths and areas for improvement.  |
| <b>Section 3</b> | A summary of risk significant objective performance opportunities and successes for classifications, notifications and PARs. A statement of how observations and follow up actions will be documented. |

# APPENDIX F

## DRILL/EXERCISE SCENARIO PACKAGE DEVELOPMENT CHECKLIST

Item	Activity Description	Date Completed
1.0	The scenario will be identified by the full date of the day it is to be run.	
2.0	<p>Determine extent of on-site and off-site participation for each of the following:</p> <p> <input type="checkbox"/> SCR      <input type="checkbox"/> TSC      <input type="checkbox"/> OSC      <input type="checkbox"/> EOF      <input type="checkbox"/> JNC  <input type="checkbox"/> Vermont      <input type="checkbox"/> New Hampshire      <input type="checkbox"/> Massachusetts  <input type="checkbox"/> NRC      <input type="checkbox"/> FEMA      <input type="checkbox"/> Other _____ </p>	
3.0	Establish exercise objectives for each applicable ERO facility.	
4.0	<p>Assemble scenario development team. Consider participation by member(s) of each of the following departments:</p> <ul style="list-style-type: none"> <li>• *Operations</li> <li>• *Radiation Protection</li> <li>• *Training/Simulator</li> <li>• Maintenance/I&amp;C</li> <li>• Chemistry</li> <li>• Reactor Engineering</li> <li>• Work Management or Control</li> <li>• Engineering</li> <li>• State (either the Entergy personnel responsible for off-site planning or the State representative)</li> <li>• Plant Safety/Medical (as required to support medical, fire, or search and rescue)</li> <li>• Security</li> </ul> <p style="text-align: right;">(* indicates area is required)</p>	
5.0	<p>Verify availability of, or arrange for, simulator time and simulator staff support:</p> <ul style="list-style-type: none"> <li>• Scenario development time</li> <li>• Scenario validation time</li> <li>• Conduct of drill/exercise</li> </ul>	



# APPENDIX F (Continued)

Item	Activity Description	Date Completed
6.0	<ul style="list-style-type: none"> <li>Alert to Site Area Emergency – seventy-five (75) minutes or more allows sufficient time to activate facilities, perform initial accountability and become operational.</li> <li>Site Area Emergency to General Emergency – seventy-five (75) minutes or more allows sufficient time for site evacuation and off-site activities such as equipment staging.</li> <li>Two (2) hours time or more should be allowed after the declaration of a GE to allow for Field Teams to track plume and off-site agencies to demonstrate emergency response.</li> </ul>	
7.0	<p>Develop a narrative and timeline of the sequence of events:</p> <p>7.1 Events must drive actions and cause conditions that result in the demonstration of all objectives.</p> <p>7.2 Avoid multiple, unrelated events to drive emergency escalation. Make events as coherent as possible.</p> <p>7.3 Identify the specific Emergency Action Levels (EALs) that require declaration of each classification. Identify clear and unambiguous plant conditions which indicate exceeding the selected EALs. Do not depend on emergency response personnel's subjective judgment for emergency classification.</p> <p>7.4 Events must support the established time constraints.</p> <p>7.5 Consider media sensitivity in the selection of initiating events.</p> <p>7.6 Radiological consequences must result in conditions necessary to demonstrate off-site protective action objectives.</p> <p>7.7 Consider the following in the development of the sequence of events:</p> <ul style="list-style-type: none"> <li>Previously identified weaknesses and objectives not met.</li> <li>Emergency Operating and abnormal event procedures.</li> <li>Individual Plant Evaluation (IPE) data and event sequences.</li> <li>Plant Technical Specifications.</li> <li>LERs and IE Notices applicable to events and component failures.</li> </ul> <p>7.8 Event description should also include expected re-entry and recovery activities as well as any peripheral events necessary to demonstrate objectives that do not lend themselves to main scenario sequence of events (i.e., fire brigade, medical emergency).</p>	

# APPENDIX F (Continued)

Item	Activity Description	Date Completed
8.0	<p>Scenario narrative and time line should be reviewed by development team to ensure:</p> <ul style="list-style-type: none"> <li>• Ability to support demonstration of objectives.</li> <li>• Consistency with desired radiological consequences.</li> <li>• Consistency with established time constraints.</li> <li>• Coherence of events.</li> <li>• Simulator capabilities support event sequence.</li> </ul>	
9.0	<p>Define initial plant conditions:</p> <ul style="list-style-type: none"> <li>• Plant power history – select power history as necessary to support both decay heat load for core damage and fission product inventory for source term.</li> <li>• Equipment out-of-service – select equipment that is both related and non-related to scenario event sequence, but realistic for the plant operating condition (i.e., do not have equipment out-of-service that would require the plant to be shutdown by Tech Specs if the plant is assumed to be operating). Utilize out-of-service equipment as part of scenario to minimize unrealistic equipment failures (i.e., one emergency diesel fails while other is OOS for maintenance instead of both emergency diesel generators failing.)</li> <li>• Ongoing and completed surveillance – results of recent or ongoing equipment surveillance can be used as initiators or forewarning of equipment/system failures.</li> <li>• Meteorological conditions – Current and forecasted weather.</li> </ul>	
10.0	<p>Conduct simulator runs of sequence of events:</p> <ul style="list-style-type: none"> <li>• Identify necessary simulator ICs, malfunctions and overrides required for the simulator to drive the scenario.</li> <li>• Dry run the scenario to ensure plant response supports scenario assumptions and drives desired actions.</li> <li>• If necessary collect backup plant data for use in case simulator fails during exercise.</li> <li>• Use simulator capabilities such as Malfunction Scenarios and then save the scenario as a canned sequence ready to run.</li> <li>• Record Malfunction Scenario(s) for use by the simulator operator to follow during the exercise.</li> <li>• Ensure security of canned scenario saved on simulator computers.</li> </ul>	

# APPENDIX F (Continued)

Item	Activity Description	Date Completed
11.0	<p>Develop player message sheets:</p> <p>Plant Data is normally provided through the simulator. If plant simulator is not used:</p> <ul style="list-style-type: none"> <li>• Prepare a hard copy of plant data based on simulator runs or other methods used to develop plant data.</li> <li>• Plant data shall reflect normally monitored and available parameters.</li> <li>• Data format shall be consistent with the way data is normally displayed and obtained (e.g., if data is obtained from a control panel, it is consistent with the range, units and scale of the control room instrument).</li> <li>• Frequency of data updates is adequate for changing conditions (e.g., 15-minute intervals for steady state conditions, more frequent during transient or changing conditions).</li> <li>• Data should be consistent with simulated events.</li> <li>• Exclude data that is confusing or intended to throw the players off track. Do not attempt to prove an inadequacy in plant procedures or design.</li> </ul> <p>Other information to be supplied to participants:</p> <ul style="list-style-type: none"> <li>• Provide 'dynamic' instead of 'static' data when possible. Dynamic data support participant actions; static data requires participant actions to support the data.</li> <li>• Refer all data to drill/exercise 'elapsed' time instead of 'clock' time. This allows the Lead Drill/Exercise controller to make adjustments to the timeline while limiting controller/observer confusion.</li> <li>• Participant messages shall provide direct indication of events or response to actions not available from plant data that would otherwise be readily apparent (e.g., visual results of an in-plant action).</li> <li>• Messages shall be 'non-prompting' and only provide information in a form reasonably expected to be available to the player. Messages should never volunteer information.</li> <li>• Messages shall provide results of simulations.</li> <li>• Mark up procedures, if needed, for simulated activities.</li> </ul>	

# APPENDIX F (Continued)

Item	Activity Description	Date Completed
12.0	<p>Develop controller information sheets that include:</p> <p>12.1 Additional controller information:</p> <ul style="list-style-type: none"> <li>Contingent or dynamic plant data not provided from the simulator in real time.</li> <li>Simulation information for activities that may be dangerous or impose unwarranted cost.</li> <li>Explanatory notes.</li> <li>Interceding actions (e.g., prevent an operator from tripping the reactor until the required scenario time).</li> <li>Safety/ALARA precautions (e.g., a note to preclude entry into a high radiation area)</li> </ul> <p>12.2 Anticipated player response:</p> <ul style="list-style-type: none"> <li>Expected points of recognition and declaration of emergency classifications.</li> <li>Emergency procedures to be entered.</li> <li>Assessment and corrective actions that might be taken.</li> </ul>	
13.0	<p>Develop radiological data sheets:</p> <ul style="list-style-type: none"> <li>Develop tables, on- and off-site maps, in-plant drawings and or computer displays to allow controllers to present radiological data in a realistic form to participants.</li> </ul>	
	<p>13.1 Core damage and chemistry data consistent with core damage procedure that includes:</p> <ul style="list-style-type: none"> <li>Percent core damage consistent with event severity.</li> <li>Confirmatory data (e.g., containment hydrogen concentrations and containment area radiation levels).</li> <li>Coolant chemistry data.</li> <li>Fission product concentrations consistent with percent and type of core damage and reactor power history.</li> <li>Sample analysis results if appropriate for sample methodology and location.</li> </ul>	

# APPENDIX F (Continued)

Item	Activity Description	Date Completed
13.2	<p data-bbox="360 263 783 297">In-plant radiological data sheets:</p> <p data-bbox="360 306 806 340">13.2.1 Time dependent data for:</p> <ul data-bbox="482 348 1123 527" style="list-style-type: none"> <li data-bbox="482 348 882 383">• Area radiation levels.</li> <li data-bbox="482 391 987 425">• Surface contamination levels.</li> <li data-bbox="482 434 1096 468">• Airborne radioactivity concentrations.</li> <li data-bbox="482 476 1123 510">• Personnel contamination (if applicable).</li> </ul> <p data-bbox="360 532 1202 749">13.2.2 Radiation data should be consistent with plant conditions and considers process system piping and equipment operation (e.g., if radioactive steam is flowing through process piping outside containment, area radiation levels in the vicinity of the piping should be elevated).</p> <p data-bbox="360 761 1202 1059">13.2.3 Area radiation levels should not preclude access to plant areas requiring in-plant operator actions(e.g., if a repair team must access a plant location to repair a component critical to the scenario, area radiation levels in the location may be reduced so that team dispatch is not precluded). Emergency exposure authorization should not be assumed, this frequently a judgment by the participant with authorization authority.</p> <p data-bbox="360 1072 1093 1140">13.2.4 Airborne radioactivity data should reflect plant ventilation flowpaths and filtering effects.</p>	

# APPENDIX F (Continued)

Item	Activity Description	Date Completed
	<p>13.2.5 Plant effluent monitor and meteorological data sheets that include:</p> <ul style="list-style-type: none"> <li>• Effluent monitor data that is consistent with the postulated source term (e.g., the radioactivity release should not mysteriously grow from its source to the release point).</li> <li>• Effluent monitor data that is consistent with ventilation dilution, spray scrubbing and filtering effects.</li> <li>• Release rates that are based upon appropriate conversion factors for monitor and accident type.</li> <li>• Data frequency that is adequate to allow trending by players.</li> <li>• Meteorological data (wind direction and wind speed) that supports transport of release to off-site areas (note that increased wind speed results in lower dose rates and site-specific meteorological phenomenon such as fumigation and river valley effects need to be considered).</li> <li>• Data that allows determination of desired stability class.</li> </ul>	

# APPENDIX F (Continued)

Item	Activity Description	Date Completed
	<p>13.2.5 Plant effluent monitor and meteorological data sheets that include:</p> <ul style="list-style-type: none"> <li>• Effluent monitor data that is consistent with the postulated source term (e.g., the radioactivity release should not mysteriously grow from its source to the release point).</li> <li>• Effluent monitor data that is consistent with ventilation dilution, spray scrubbing and filtering effects.</li> <li>• Release rates that are based upon appropriate conversion factors for monitor and accident type.</li> <li>• Data frequency that is adequate to allow trending by players.</li> <li>• Meteorological data (wind direction and wind speed) that supports transport of release to off-site areas (note that increased wind speed results in lower dose rates and site-specific meteorological phenomenon such as fumigation and river valley effects need to be considered).</li> <li>• Data that allows determination of desired stability class.</li> </ul>	

# APPENDIX F (Continued)

Item	Activity Description	Date Completed
13.3	<p>Plume exposure data sheets that include:</p> <ul style="list-style-type: none"> <li>• Time dependent sector and/or receptor based data out to the 10 mile radius.</li> <li>• Data should be made available for the duration of the scenario (i.e., the plume exists after the release has stopped and does not disappear when the release is terminated).</li> <li>• Data should support site-specific monitoring procedures and techniques (e.g., if monitoring teams obtain 10 scf air samples by procedure, the in-field and laboratory count rates of sample media must be based on 10 scf samples; if procedures direct monitoring teams to perform both open and closed window surveys, data must be provided for both).</li> <li>• For controllers, derived data as well as raw field data should allow the controllers to verify player assessment capabilities and preclude bogus results adversely affecting the scenario.</li> <li>• The data should be an easily usable format with mpas readable by controllers (e.g., controllers in the field should be able to readily identify team location and quickly correlate location to field data and time).</li> </ul>	
13.4	<p>Ingestion exposure/recovery/reentry data sheets that include:</p> <ul style="list-style-type: none"> <li>• Data that is consistent with EPA/FDA and FEMA guidance.</li> <li>• Time dependent data to 50 mile radius.</li> <li>• Area deposition (key isotopes).</li> <li>• Soil concentrations (key isotopes).</li> <li>• Surface count rate (cpm).</li> <li>• Dose rate (3 ft).</li> <li>• 1<sup>st</sup>, 2<sup>nd</sup> and fifty-year reentry dose.</li> <li>• Water, leafy vegetable, grass and milk concentrations for I-131, CS-134 and CS-137.</li> </ul>	
14.0	<p>Develop public information materials:</p> <ul style="list-style-type: none"> <li>• Joint News Center media messages.</li> <li>• Simulated news reports.</li> <li>• Simulated questions asked by the media.</li> <li>• Phone cell/public inquiry messages.</li> </ul>	



# APPENDIX F (Continued)

Item	Activity Description	Date Completed
15.0	<p>Develop pre-exercise instructions and guidelines:</p> <ul style="list-style-type: none"> <li>Controller instructions and guidelines should include items such as safety precautions, warnings about prompting, controller ground rules and duties, telephone numbers of other controllers, drill/exercise schedule. Ensure provisions are made for termination of the exercise by the Lead Drill/Exercise controller for safety reasons.</li> <li>Participant instructions and guidelines include items such as: shift turnover information, plant conditions prior to the drill/exercise, safety precautions, and ground rules.</li> <li>Observer instructions and guidelines include items such as: checklists, drill/exercise objectives, portions of applicable procedures, safety precautions, ground rules and duties, and event log.</li> </ul>	
16.0	Review all messages, data sheets and other scenario materials for consistency, and assemble in a scenario package.	
17.0	Conduct a table-top scenario review with the development team, resolve comments, and update the scenario package as necessary.	
18.0	For full participation exercises, support state in providing scenario to FEMA Regional Office 75 days prior to exercise. FEMA will review and approve scenario package.	
19.0	<p>For full participation exercises, provide scenario to NRC Regional Office 30 days prior to exercise.</p> <p>For partial participation exercise provide scenario to NRC Resident's Office 30 days prior to exercise.</p>	
20.0	Determine required number of copies of the scenario package, obtain copies and place in numbered binders.	
21.0	<p>Maintain security of the electronic files and hardcopies of the scenario package:</p> <p>Assign password protection to electronic files.</p> <p>Store hardcopies under lock and key.</p> <p>Distribute scenario packages on a need-to-know basis only to non-participant personnel and require completion of Emergency Plan Drill/Exercise Security Agreement (VYOPF 3505.09).</p>	

# APPENDIX G

## DRILL/EXERCISE CLOSEOUT CHECKLIST

Item	Activity Description	Date Completed
1.0	Controller Manuals collected/recycled	
2.0	Gai-Tronics Link restored per Appendix A	
3.0	Controller debrief/critique conducted	
4.0	Controller's Evaluation Form (VYOPF 3505.02) collected, reviewed, signed and dispositioned	
5.0	Drill/Exercise Report written per Appendix E	
6.0	VYOPF 3506.02 and VYOPF 3506.14 – Post drill surveillances conducted	
7.0	Vermont Yankee Performance Indicator Evaluation Form (VYOPF 3505.08) completed	
8.0	Procedures replaced (Simulator)	
9.0	Controller phones returned and charging	
10.0	Exercise critique to Management (Exercise only)	

# REVISED PROCEDURE CONTROL FORM

## PART 1 - Initiation

<b>A. Procedure No.</b> OP 3531	<b>New Revision No.</b> 17	<b>Title</b> Emergency Call-In Method
<b>B. Review Criteria:</b> <input type="checkbox"/> Partial <input type="checkbox"/> Editorial <input checked="" type="checkbox"/> Complete		<b>C. Periodic Review Cycle:</b> <input checked="" type="checkbox"/> 2 Year (Event Driven) <input type="checkbox"/> N/A
<b>D. List DIs &amp; LPCs:</b> N/A		
<b>E. Description and Reasons for Procedure/Changes:</b> <del>Eliminate the Emergency Call-In Method</del> • Per AUDITRPT-2003-04B_02 added clarification to the FFD program requirements. • Added reference to AP-0864: ENN-DM-105 • Added "Drill or Exercise Call-In Method" section for use during a drill or exercise. <i>Added to discussion section as well.</i> • Added "Call-In Activation Drill" section for use during an off-hours unannounced drill.		
<b>F. Originator Name:</b> (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> 5/27/03		<b>Telephone Extension:</b> x4177

## PART 2 - Reviews

<b>A. Walk-Through Validation:</b> <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>B. Technical Verification Reviewer</b> <input type="checkbox"/> N/A (App. B used as a reference) (Print/Sign/Date) <i>Lori A. Kaczynski</i> <i>Paul A. Kaczynski</i> 11/12/03	
<b>C. Cross-Discipline Reviews:</b> <input type="checkbox"/> N/A			
<b>Department</b>	<b>Name</b>	<b>Signature</b>	<b>Date</b>
Security	<i>Brian K. Cyphers</i>	<i>[Signature]</i>	8/1 Oct 03
<b>D. 50.59 Review Per AP 6002, Preparing 50.59 Evaluations</b> <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 50.59 AD previously performed and documented in the text of this procedure and is still applicable. <input 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.			
<b>E. QUALIFIED REVIEWER:</b> 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> 11-12-03			
<b>F. ORIGINATOR:</b> <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>amp</i> 11/16/03 <input checked="" type="checkbox"/> Proofread after Final Type (Print/Sign/Date) <i>Audra Williams</i> <i>Audra Williams</i> 11-12-03			

### 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: *To all security staff*

☐ 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* *11/13/03*

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

N/A

C. Special Instructions: ☐ N/A

☐ Approved for Training

☒ Issue on DATE: *11-19-03*

☐ Submit Surveillance Database Change per AP 4000

☐ Other:

### PART 6 - Issuance

Procedure Change No.: *222*

Date procedure issued: *11/19/03*

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 3531, Rev. 17

Reviewer/Date (Print) Audra Williams 5/27/03

### 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
<b>Chemistry:</b> <ul style="list-style-type: none"> <li>Potentially affects condensate, feedwater, or reactor water chemistry, or chemistry instruments.</li> <li>Procedures that implement the requirements of the VY Environmental Program. (see PP 7603, Appendix A)</li> <li>Produces/affects effluents or effluent monitoring (VY/QA 01-015).</li> <li>Affects NPDES limits or method of compliance.</li> </ul>		X
<b>Maintenance (Mech, Elec, I&amp;C):</b> <ul style="list-style-type: none"> <li>Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&amp;TE, lifting and landing of leads and connectors.</li> </ul>		X
<b>Operations:</b> <ul style="list-style-type: none"> <li>Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO.</li> <li>Requires Operations alignment/restoration of systems or components.</li> <li>Specifies surveillance or post maintenance testing by Operations.</li> </ul>		X
<b>EOP/SAG Coordinator:</b> <ul style="list-style-type: none"> <li>Procedures that have the potential to affect the EOPs/SAGs.</li> </ul>		X

# APPENDIX C (Continued)

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

# APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
<b>Setpoint Coordinator:</b> <ul style="list-style-type: none"> <li>Changes that impact setpoints, as-found/as-left tolerances, M&amp;TE or testing methodology.</li> </ul>		X
<b>Nuclear &amp; PRA</b> <ul style="list-style-type: none"> <li>Potentially affects IPEEE or ORAM Sentinel Risk Models.</li> <li>Potentially affects plant SSCs reliability.</li> <li>Potentially affects Nuclear or Radiological Safety Analysis.</li> </ul>		X
<b>Security:</b> <ul style="list-style-type: none"> <li>Procedures that implement the requirements of the VY Physical Security and Training and Qualification Plans.</li> <li>Changes that have a potential for reduction of the VY Physical Security and Training and Qualification Plan commitments.</li> <li>Obtain and attach a 10CFR50.54(P) Evaluation.</li> </ul>		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 3531, Rev. 17, Emergency Call-In Method

### 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 10CFR50.47(b):

- (1) Assignment of Emergency Response Organization responsibilities
- (2) Assignment of on-shift Emergency Response Organization personnel
- (3) Arrangements for Emergency Response Support and Resources
- (4) Emergency Classification and Action levels, including facility system and effluent parameters
- (5) Notification Methods and Procedures
- (6) Emergency Communications among principal response organizations and the public
- (7) Public Education and Information
- (8) Adequacy of Emergency Facilities and Equipment
- (9) Adequacy of Accident Assessment methods, systems and equipment
- (10) Plume exposure pathway EPZ protective actions
- (11) Emergency Worker Radiological Exposure Control
- (12) Medical Services for contaminated injured individuals
- (13) Recovery and Reentry Plans
- (14) Emergency response periodic drills and exercises
- (15) Radiological Emergency Response Training
- (16) Plan development, review and distribution

YES	NO
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
X	
	X
	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 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

YES	NO
-----	----

	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)(14) 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 include adding reference to AP 0864, Fitness for Duty, in the discussion section for clarification that the FFD policy is to be followed during CAN and alternate call in methods.

Added two new sections for tests. One new section outlines the steps Security needs to follow to initiate a Call-In Activation Drill and other one outlines the steps for actions during a Drill or Exercise. By adding these sections with the specific steps, it avoids the need for controller cards and controller intervention. Reduces the chance of errors in either missing a needed step or completing a step that should have not been performed. These changes add clarity and formality to the procedure.

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: \_\_\_\_\_

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

Document(s) affected: OP 3505

Section(s) affected: B.6.

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: 9/17/03  
(Print/Sign)

Reviewed By: Lori A. Tkaczyk Lori A. Tkaczyk Date: 9/17/03  
(Emergency Plan Coordinator) (Print/Sign)

VERMONT YANKEE NUCLEAR POWER STATION

**OPERATING PROCEDURE**

OP 3531

REVISION 17

**EMERGENCY CALL-IN METHOD**

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages

Implementation Statement: N/A

Issue Date: 11/19/03

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## PURPOSE

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

## DISCUSSION

In the event the Vermont Yankee Emergency Plan is activated by the Shift Manager/Plant Emergency Director (SM/PED), the Security Shift Supervisor (SSS) is responsible to initiate activation of the Emergency Call-In Method through the use of the CAN system, activate the VY pagers, call the VY Office in Brattleboro, the Power Uprate Building, and the Plant Support Building, and activate the Framatome ANP pagers.

Section I of this procedure contains the steps the SSS should follow for notifications required during activation of the Emergency Call-In Method.

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

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

1. A weekly functional test of the pager system to selectively test pager performance will be conducted.
2. An annual off-hours, unannounced communications drill, using the Vermont Yankee Emergency Call-In Method, to estimate emergency personnel response times will be conducted.
3. Drills and exercises using the Vermont Yankee Emergency Call-In Method will be conducted periodically on an annual basis.
4. An off-hours, unannounced call-in activation drill, using the Vermont Yankee Emergency Call-In Method, to estimate emergency personnel response times may be conducted.

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

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

Emergency response personnel who are called by the CAN system or by the Alternate Emergency Call-In Method are responsible, per ENN-OM-105, for reporting whether they are fit for duty by responding to the FFD questions prior to reporting to their assigned facilities.

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 procedure scope is not changed. 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 3531.01 Weekly Pager Functional Test

## QA REQUIREMENTS CROSS REFERENCE

1. None

## REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
  - a. VYNP Emergency Plan
  - b. VYNP Implementing Procedures to the Emergency Plan
2. Codes, Standards, and Regulations
  - a. NUREG0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
3. Commitments
  - a. None
4. Supplemental References
  - a. Emergency Call-In List
  - b. ENN-OM-105, Fitness For Duty Program
  - c. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

## PROCEDURE

### I. EMERGENCY CALL-IN METHOD

#### NOTES

- If the initial Emergency Classification is an Unusual Event, the emergency call-in method is activated for the Unusual Event. If there are subsequent escalations in the Emergency Classification, the emergency call-in method is only activated for that first subsequent escalation in the Emergency Classification.
- If the initial Emergency Classification is an Alert or higher, the emergency call-in method is activated for that initial Emergency Classification. For any subsequent escalation in the Emergency Classification, the emergency call-in method is not activated.
- Steps may be performed concurrently.
- If the initial Emergency Classification is due to a Code Red Security Event, the emergency call-in method is activated for that initial Emergency Classification. For any subsequent escalation in the Emergency Classification, the emergency call-in method is not activated.

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

1. Contact the Plant Support Building and Power Uprate Building by dialing 3999 and announcing the emergency classification and declaration time over the office paging system.

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials (Security):\_\_\_\_\_

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

a. Contact the Community Alert Network (CAN) Operator at 9-1-800-552-4226.

b. If you are connected to the CAN Hotline recording, do the following, otherwise go to Step 2.c:

1) Provide the following message when requested:

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

My password is \_\_\_\_\_.

My callback number is \_\_\_\_\_."

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

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

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

1) Report the following to the CAN Operator:

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

(Pause approx. 5 seconds)

My password is \_\_\_\_\_.

(Pause approx. 5 seconds)

My callback number is \_\_\_\_\_.



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

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

- 3) The CAN Operator will ask you the Event Time (which is the declaration time \_\_\_\_\_ Hours.)

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

- ☐ [REDACTED]
- ☐ [REDACTED]
- ☐ Other: \_\_\_\_\_ - \_\_\_\_\_

- 5) Record the following:

Date \_\_\_\_\_ Time \_\_\_\_\_

Person Contacted \_\_\_\_\_ and hang up.

Initials (Security) \_\_\_\_\_

d. Activate the VY Pager System as follows:

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

**NOTE**

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

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

**NOTE**

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

**EMERGENCY  
CLASSIFICATION**

**BUTTONS  
PRESSED**

Unusual Event	-	111 800 XXX XXXX
Alert	-	222 800 XXX XXXX
Site Area	-	333 800 XXX XXXX
General	-	444 800 XXX XXXX
Code Red Security Event	-	777 800 XXX XXXX

- 4) If indications are received that the group paging capability is out of service, implement the emergency paging company notification specified in Section IV.
- e. Contact the Corporate Building in Brattleboro by dialing 4699 and announcing the emergency classification and declaration time over the office paging system.

Date \_\_\_\_\_ Time \_\_\_\_\_ Initials (Security): \_\_\_\_\_

**NOTE**

DO NOT activate Framatome ANP pagers for a Code Red Security Event.

f. Activate the Framatome ANP Personnel Pager system as follows:

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

**NOTES**

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

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

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

**NOTE**

If the verbal closeout is not heard, repeat Steps 2.g.1) through 2.g.4).

- 4) Listen for the verbal closeout and a busy signal, and hang up. Your message has been transmitted.
- g. If a CAN callback to confirm successful activation is not received within 5 minutes, call the CAN Operator at [REDACTED] to determine status.
- h. If indications are received from the CAN Operator that the method failed to activate, implement the Alternate Emergency Call-In Method specified in Section V.

3. After receiving CAN callback to confirm successful activation, notify the Shift Manager/Plant Emergency Director (SM/PED) that the Emergency Call-In Notification System has been activated. (x5270)

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials (Security):\_\_\_\_\_

**NOTE**

DO NOT retrieve the ERO response report during a Code Red Security Event.

4. Retrieve the ERO response report from the General Manager's FAX machine on the second floor of the Administration Building and provide to DCO/TSC Coordinator.

**II. ALTERNATE COMMUNICATOR NOTIFICATION**

**NOTE**

An Alternate Communicator will NOT be contacted during a Code Red Security Event.

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

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

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

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

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

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials (Security):\_\_\_\_\_

### III. AUGMENTATION TESTS/DRILL

#### A. Weekly Pager Functional Test

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

#### NOTE

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

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

#### NOTE

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

- a. Dial 9-XXX-XXXX.
  - b. After hearing the verbal prompt, press [REDACTED] and hang up.
4. SSS shall implement the following for DCO activities:
  - a. IF the DCO fails to respond within approximately 30 minutes, THEN attempt to contact the DCO via commercial telephone system.
  - b. IF the DCO is successfully contacted, THEN proceed to step III.A.5.

- c. IF unable to make contact within one hour, THEN immediately notify the Operations Shift Manager (x5270) and generate an Event Report.
5. Upon completion of the system activation, the SSS completes the applicable section of VYOPF 3531.01, "Weekly Pager Functional Test".
6. Upon receiving the page, the Duty On Call Officer (DCO) contacts the SSS and provides the information required by VYOPF 3531.01. VYOPF 3531.01 is then signed and routed to the Emergency Plan Coordinator for completion.

NOTES

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

7. In the event the Security Shift Supervisor (SSS) or the DCO pager does not respond to the weekly functional test, they should perform a self test of their individual pager by calling in a test message to their own pager telephone number. If no response to this self test is received, the pager holder should make this known to the Emergency Plan Coordinator.
8. The Emergency Plan Coordinator completes the information required by the "Additional Pager Holder" section of VYOPF 3531.01.

B. Drill or Exercise Call-In Method

NOTES

- If the initial Emergency Classification is an Unusual Event, the drill or exercise call-in method is activated for the Unusual Event. If there are subsequent escalations in the Emergency Classification, the drill or exercise call-in method is only activated for the first subsequent escalation in the Emergency Classification.
- If the initial Emergency Classification is an Alert or higher, the drill or exercise call-in method is activated for that initial Emergency Classification. For any subsequent escalation in the Emergency Classification, the drill or exercise call-in method is not activated.
- Steps may be performed concurrently.
- If the initial Emergency Classification is due to a Code Red Security Event, the drill or exercise call-in method is activated for that initial Emergency Classification. For any subsequent escalation in the Emergency Classification, the drill or exercise call-in method is not activated.

1. Upon receiving notification of a SIMULATED Unusual Event, Unusual Event (Terminated), Alert, Site Area Emergency, General Emergency, or Code Red Event, the SSS or designated alternate shall:
  - a. Contact the Plant Support Building and Power Uprate Building by dialing 3999 and announcing the emergency classification and declaration time over the office paging system.  
  
Date \_\_\_\_\_ Time \_\_\_\_\_ Initials (Security): \_\_\_\_\_
  - b. Activate the VY Pager System as follows:
    - 1) Dial [REDACTED]
    - 2) After hearing the verbal prompt, dial in password 5787.

**NOTE**

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

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

<u>EMERGENCY CLASSIFICATION</u>		<u>BUTTONS PRESSED</u>
Unusual Event	-	000 111
Alert	-	000 222
Site Area	-	000 333
General	-	000 444
Code Red Security Event	-	000 777

- 4) If indications are received that the group paging capability is out of service, implement the emergency paging company notification specified in Section IV.
- c. Contact the Corporate Building in Brattleboro by dialing 4699 and announcing the emergency classification and declaration time over the office paging system.

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials (Security):\_\_\_\_\_



**NOTE**

Acceptance criteria for the Annual Communications Drill shall be satisfying the requirements of Table 8.4 of the Vermont Yankee Emergency Plan.

**C. Annual Communications Drill**

1. At the direction of the Emergency Plan Coordinator (EPC), the Security Shift Supervisor (SSS) shall activate the VY Emergency Call-In notification system as follows:

- a. Contact the Community Alert Network (CAN) Operator at

- b. If you are connected to the CAN Hotline recording, do the following, otherwise go to Step 1.c:

- 1) Provide the following message when requested:

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

My password is \_\_\_\_\_.

My callback number is \_\_\_\_\_.

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

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

- 1) Report the following to the CAN Operator:

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

(Pause approx. 5 seconds)

My password is \_\_\_\_\_.

(Pause approx. 5 seconds)

My callback number is \_\_\_\_\_.

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

**"The Event Type is a Test"**

- 3) The CAN Operator will ask you the **Event Time** (which is the declaration time: \_\_\_\_\_ hours).
- 4) The CAN Operator will then tell you which of the following 800 telephone numbers should be used for pager holder call-backs:

☐ [REDACTED]

☐ [REDACTED]

☐ Other: \_\_\_\_\_ - \_\_\_\_\_

- 5) Record the following:

Date \_\_\_\_\_ Time \_\_\_\_\_

Person Contacted \_\_\_\_\_ and hang up.

Initials (Security) \_\_\_\_\_

- d. Activate the VY Pager System as follows:

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

**NOTE**

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

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

**000 800 XXX XXXX**

- 4) Hang up.

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

Status/Outcome: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

D. Call-In Activation Drill

1. Upon receiving notification of a SIMULATED Alert, Site Area Emergency, General Emergency, or Code Red Event, the SSS or designated alternate shall activate the Emergency Call-In Notification System as follows:

- a. Contact the Community Alert Network (CAN) Operator at [REDACTED]

- b. If you are connected to the CAN Hotline recording, do the following, otherwise go to Step 1.c:

- 1) Provide the following message when requested:

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

My password is \_\_\_\_\_.

My callback number is \_\_\_\_\_.

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

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

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

1) Report the following to the CAN Operator:

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

(Pause approx. 5 seconds)

My password is \_\_\_\_\_.

(Pause approx. 5 seconds)

My callback number is \_\_\_\_\_.

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

"The Event Type is a **CALL-IN DRILL**"

3) The CAN Operator will ask you the Event Time (which is the declaration time: \_\_\_\_\_ Hours).

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

☐ \_\_\_\_\_

☐ \_\_\_\_\_

☐ Other: \_\_\_\_\_ - \_\_\_\_\_

5) Record the following:

Date \_\_\_\_\_ Time \_\_\_\_\_

Person Contacted \_\_\_\_\_ and hang up.

Initials (Security) \_\_\_\_\_

d. Activate the VY Pager System as follows:

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

**NOTE**

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

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

**000 800 XXX XXXX**

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

e. Contact the PSB and PUB by dialing 3999 and announcing the emergency classification and declaration time over the office paging system.

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials (Security):\_\_\_\_\_

f. Contact the Corporate Building in Brattleboro by dialing 4699 and announcing the emergency classification and declaration time over the office paging system.

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials (Security):\_\_\_\_\_

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

Status/Outcome:\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- h. If indications are received from the CAN Operator that the method failed to activate, implement the Alternate Emergency Call-In Method specified in Section V.
2. After receiving CAN callback to confirm successful activation, notify the Shift Manager/Plant Emergency Director (SM/PED) (x5270) that the Emergency Call-In Notification System has been activated.  
  
Date \_\_\_\_\_ Time \_\_\_\_\_ Initials (Security): \_\_\_\_\_
3. Retrieve the test report from the FAX machine on the second floor of the Administration Building and forward to the Emergency Plan Coordinator.

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

- A. If indications have been received that the group paging capability is out of service, the Security Shift Supervisor (SSS) shall call the paging company emergency number for emergency service, as follows:
  1. Dial [REDACTED]
  2. State the following message: This is \_\_\_\_\_ of Vermont Yankee Nuclear Power Station in Vernon, Vermont. Our group paging capability is out of service. Please page the on-call person immediately and have them call [REDACTED] as soon as possible", and hang up.  
  
Date \_\_\_\_\_ Time \_\_\_\_\_ Initials \_\_\_\_\_  
(SSS)
  3. Return to the next step in the procedure from where you exited to Section IV.

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

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

Date \_\_\_\_\_ Time \_\_\_\_\_ Initials \_\_\_\_\_  
(SSS)

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

V. ALTERNATE EMERGENCY CALL-IN METHOD

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

**NOTE**

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

1. Activate the VY Pager System as follows:

- a. Dial [REDACTED]
- b. After hearing the verbal prompt, dial in password 5787.

**NOTES**

- A display of "111", "222", "333", "444", or "777" on a pager, notifies the pager holder of the designated Emergency Classification. Pager holder should call the plant immediately.
- A display of "111" is used for Unusual Event (Terminated).

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

<u>EMERGENCY CLASSIFICATION</u>		<u>BUTTONS PRESSED</u>
Unusual Event	-	111
Alert	-	222
Site Area	-	333
General	-	444
Security Event	-	777



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

1) For Unusual Event or Unusual Event Terminated:

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

- ☐ Unusual Event  
☐ Unusual Event Terminated

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

(Repeat)

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

- ☐ Unusual Event  
☐ Unusual Event Terminated

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

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

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials\_\_\_\_\_  
(Security)

2) For Alert (or higher classification):

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

- ☐ Alert  
☐ Site Area Emergency  
☐ General Emergency

(Repeat)

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

- ☐ Alert  
☐ Site Area Emergency  
☐ General Emergency

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

**Record the time the pager holder, or alternate, calls back in the "Contact Time" column and record the estimated time of arrival in the "ETA" column of the pager Holder Call-In List.**

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials\_\_\_\_\_  
(Security)

**3) For Code Red Security Event:**

**"Vermont Yankee has declared a Code Red Security Event"**

**(Repeat)**

**"Vermont Yankee has declared a Code Red Security Event"**

**Please initiate your department call-in per your department appendix in the Emergency Call-In List. Instruct personnel to report to the Emergency Operations Facility in Brattleboro. DO NOT report to the Plant. Please report to the Emergency Operations Facility in Brattleboro as soon as possible."**

**Record the time the pager holder, or alternate, calls back in the "Contact Time" column and record the estimated time of arrival in the "ETA" column of the pager Holder Call-In List.**

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials\_\_\_\_\_  
(Security)

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

**NOTE**

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

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

**NOTES**

- Personnel appearing in the Emergency Call-In List on both the Team Duty Call-In List and Appendix A should only be called once.
- If a pager holder or designated alternate has already called or reported to the plant, they do not have to be called.

- a. Call the Team on Duty (by commercial telephone) as listed in the Team Duty Call-In List of the Emergency Call-In List.
- b. Call each pager holder (or designated alternate(s)) listed in Appendix A of the Emergency Call-In List.
- c. State the following message for the appropriate emergency classification:

1) For Unusual Event or Unusual Event Terminated:

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

- ☐ Unusual Event  
☐ Unusual Event Terminated

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

(Repeat)

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

- ☐ Unusual Event  
☐ Unusual Event Terminated

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

Date \_\_\_\_\_ Time \_\_\_\_\_ Initials \_\_\_\_\_  
(Security)

2) For Alert (or higher classification):

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

- ☐ Alert
- ☐ Site Area Emergency
- ☐ General Emergency

**(Repeat)**

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

- ☐ Alert
- ☐ Site Area Emergency
- ☐ General Emergency

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

Date \_\_\_\_\_ Time \_\_\_\_\_ Initials \_\_\_\_\_  
(Security)

3) For Code Red Security Event:

**"Vermont Yankee has declared a Code Red Security Event"**

**(Repeat)**

**"Vermont Yankee has declared a Code Red Security Event"**

**Please initiate your department call-in per your department appendix in the Emergency Call-In List. Instruct personnel to report to the Emergency Operations Facility in Brattleboro. DO NOT report to the Plant. Please report to the Emergency Operations Facility in Brattleboro as soon as possible."**

Date \_\_\_\_\_ Time \_\_\_\_\_ Initials \_\_\_\_\_  
(Security)

3. Notify the Shift Manager/Plant Emergency Director (SM/PED) (x5270) after the VY Pager System has been activated.

Date\_\_\_\_\_ Time\_\_\_\_\_ Initials\_\_\_\_\_  
(Security)

#### FINAL CONDITIONS

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

Completed By \_\_\_\_\_  
Security (Print/Sign) \_\_\_\_\_ Date \_\_\_\_\_

Approved By \_\_\_\_\_  
Emergency Plan Coordinator (Print/Sign) \_\_\_\_\_ Date \_\_\_\_\_

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

## WEEKLY PAGER FUNCTIONAL TEST

Pager System Activation by \_\_\_\_\_  
Security \_\_\_\_\_ Time \_\_\_\_\_ Date \_\_\_\_\_

Security Shift Supervisor's Name \_\_\_\_\_

1. Was your pager turned on? \_\_\_\_\_ Time of test \_\_\_\_\_
2. Exact location at the time of test? \_\_\_\_\_
3. Did you receive the tone? \_\_\_\_\_ Message \_\_\_\_\_
4. If you received the tone only, did you call the Plant to determine Plant status and reason for pager system activation?  
\_\_\_\_\_
5. Comments: \_\_\_\_\_

DCO Name \_\_\_\_\_

1. Was your pager turned on? \_\_\_\_\_ Time of test \_\_\_\_\_
2. Exact location at the time of test? \_\_\_\_\_
3. Did you receive the tone? \_\_\_\_\_ Message \_\_\_\_\_
4. If you received the tone only, did you call the Plant to determine Plant status and reason for pager system activation?  
\_\_\_\_\_
5. Comments: \_\_\_\_\_

Additional Pager Holder Name \_\_\_\_\_

1. Was your pager turned on? \_\_\_\_\_ Time of test \_\_\_\_\_
2. Exact location at the time of test? \_\_\_\_\_
3. Did you receive the tone? \_\_\_\_\_ Message \_\_\_\_\_
4. If you received the tone only, did you call the Plant to determine Plant status and reason for pager system activation?  
\_\_\_\_\_
5. Comments: \_\_\_\_\_

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

# PREAPPROVED LPC FORM

## PART 1 - Initiation

☐ Converted to Admin. Revision #

LPC No: 1

A. Procedure No.: <b>OP 3540</b>	Current Revision #: <b>3</b>	Title: <b>Control Room Actions During an Emergency</b>
B. Description of Change: ♦ Changed the PAGE SYS VOLUME INCREASE switch to PAGE SYSTEM VOLUME AND ALARM TONE SELECT switch		
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>UND-2003-370_07</u> <input type="checkbox"/> Editorial		
D. Duration: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> One Time Only	I. Originator (Print/Sign/Date) (Use AP 0096, App. A as a reference) (Complete & attach AP 0096 App. C, unless editorial)	
E. Surveillance Database Change? <input type="checkbox"/> Yes, change submitted <input checked="" type="checkbox"/> No	Audra Williams 10/24/03	
F. Procedure Type: <input checked="" type="checkbox"/> Technical <input type="checkbox"/> Admin. (AP,PP)	<i>Audra Williams</i>	
G. AP 0091, Risk Assessment <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
H. Page(s) affected: <u>VYOPF 3540.01 page 1, .02 page 1, .03 page 1, .04 page 1, .05 page 1</u>		

## 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 <i>Scott T Brown</i> <i>Scott T Brown</i> 10/24/03 (May perform Qualified Review) (N/A if editorial change)	B. Cross-Discipline Review(s) (Print/Sign/Date) <input type="checkbox"/> N/A Audra Williams 10/24/03 <i>Audra Williams</i>
C. Qualified Review (Print/Sign/Date) (Use AP 0096, Appendix D, as a reference) <input type="checkbox"/> N/A <i>Audra Williams</i> <i>Audra Williams</i> 10/24/03 (N/A if editorial change)	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) 11/2/03 <i>Brian M. Finn</i> <i>Brian M. Finn</i>	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 N/A	
I. Effective Date: 11/19/03	

CDS Initials *max*

## 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 3540, Rev. 3, LPC#1

Reviewer/Date (Print) Audra Williams 9/18/03

### 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
<b>Chemistry:</b> <ul style="list-style-type: none"> <li>Potentially affects condensate, feedwater, or reactor water chemistry, or chemistry instruments.</li> <li>Procedures that implement the requirements of the VY Environmental Program. (see PP 7603, Appendix A)</li> <li>Produces/affects effluents or effluent monitoring (VY/QA 01-015).</li> <li>Affects NPDES limits or method of compliance.</li> </ul>		X
<b>Maintenance (Mech, Elec, I&amp;C):</b> <ul style="list-style-type: none"> <li>Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&amp;TE, lifting and landing of leads and connectors.</li> </ul>		X
<b>Operations:</b> <ul style="list-style-type: none"> <li>Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO.</li> <li>Requires Operations alignment/restoration of systems or components.</li> <li>Specifies surveillance or post maintenance testing by Operations.</li> </ul>		X
<b>EOP/SAG Coordinator:</b> <ul style="list-style-type: none"> <li>Procedures that have the potential to affect the EOPs/SAGs.</li> </ul>		X



<b>Quality Assurance:</b> <ul style="list-style-type: none"> <li>Compliance with QA Program requirements cannot be readily determined by the Qualified Reviewer.</li> </ul>		X
<b>Radiation Protection:</b> <ul style="list-style-type: none"> <li>Involves work in contaminated areas and high radiation areas.</li> <li>Involves work that breaches contaminated systems or components.</li> <li>Changes in radwaste or hazardous waste generation.</li> </ul>		X
<b>Emergency Plan Coordinator:</b> <ul style="list-style-type: none"> <li>Emergency Plan Implementing Procedures.</li> <li>Obtain and attach a 10CFR50.54(q) Evaluation.</li> <li>Affects Emergency Plan personnel, facilities or equipment.</li> </ul>	X	
<b>Software Quality Assurance Administrator</b> <ul style="list-style-type: none"> <li>Procedures that define how software is developed.</li> </ul>		X
<b>Reactor Engineering:</b> <ul style="list-style-type: none"> <li>Could affect core reactivity, thermal power, reactor heat balance, or fuel integrity.</li> <li>Involves refueling operations.</li> </ul>		X
<b>Systems/Project/Design Engineering:</b> <ul style="list-style-type: none"> <li>Maintenance Rule in-scope systems unavailability time.</li> <li>Involves infrequently performed test or evolution.</li> <li>Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO.</li> <li>Significant changes in system test or operation methodology.</li> </ul>		X
<b>Appendix J Coordinator:</b> <ul style="list-style-type: none"> <li>Changes that affect App. J leakrates or containment boundaries, or boundary valve manipulation.</li> </ul>		X
<b>Appendix R Coordinator:</b> <ul style="list-style-type: none"> <li>Appendix R implementing procedures.</li> </ul>		X
<b>Environmental Qualification (EQ) Coordinator:</b> <ul style="list-style-type: none"> <li>Change in EQ test methodology or component lifetime.</li> <li>Potentially affects area EQ component environment.</li> </ul>		X
<b>Fire Protection Coordinator (FPC):</b> <ul style="list-style-type: none"> <li>Fire Protection procedures.</li> <li>Affects fire loading</li> <li>Affects fire barrier integrity.</li> <li>Affects fire protection systems or component functionality.</li> </ul>		X
<b>IST Program Coordinator:</b> <ul style="list-style-type: none"> <li>Inservice Testing Program implementing procedures.</li> <li>All surveillance procedures.</li> </ul>		X
<b>ISI Program Coordinator:</b> <ul style="list-style-type: none"> <li>Inservice Inspection Program implementing procedures.</li> </ul>		X

<b>Setpoint Coordinator:</b> <ul style="list-style-type: none"> <li>Changes that impact setpoints, as-found/as-left tolerances, M&amp;TE or testing methodology.</li> </ul>		X
<b>Nuclear &amp; PRA</b> <ul style="list-style-type: none"> <li>Potentially affects IPEEE or ORAM Sentinel Risk Models.</li> <li>Potentially affects plant SSCs reliability.</li> <li>Potentially affects Nuclear or Radiological Safety Analysis.</li> </ul>		X
<b>Security:</b> <ul style="list-style-type: none"> <li>Proceures that implement the requirements of the VY Physical Security and Training and Qualification Plans.</li> <li>Changes that have a potential for reduction of the VY Physical Security and Training and Qualification Plan commitments.</li> <li>Obtain and attach a 10CFR50.54(P) Evaluation.</li> </ul>		X
<b>MOV Program Coordinator:</b> <ul style="list-style-type: none"> <li>Potentially affects system parameters for which MOV operation has been evaluated.</li> </ul>		X
<b>AOV Program Coordinator:</b> <ul style="list-style-type: none"> <li>Potentially affects system parameters for which AOV operation has been evaluated.</li> </ul>		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 3540, Rev. 3, LPC#1, Control Room Actions During an Emergency

### 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 10CFR50.47(b):

- (1) Assignment of Emergency Response Organization responsibilities
- (2) Assignment of on-shift Emergency Response Organization personnel
- (3) Arrangements for Emergency Response Support and Resources
- (4) Emergency Classification and Action levels, including facility system and effluent parameters
- (5) Notification Methods and Procedures
- (6) Emergency Communications among principal response organizations and the public
- (7) Public Education and Information
- (8) Adequacy of Emergency Facilities and Equipment
- (9) Adequacy of Accident Assessment methods, systems and equipment
- (10) Plume exposure pathway EPZ protective actions
- (11) Emergency Worker Radiological Exposure Control
- (12) Medical Services for contaminated injured individuals
- (13) Recovery and Reentry Plans
- (14) Emergency response periodic drills and exercises
- (15) Radiological Emergency Response Training
- (16) Plan development, review and distribution

YES	NO
-----	----

	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	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 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

YES	NO
-----	----

	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. n/a of Section A above, this change

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

#### BASIS FOR ANSWER:

Added wording to ensure that Control Room Personnel refer to OP 3132 first if they are notified of a Security Event. Corrected the label for the switch that the Control Room uses for paging of an event. None of these changes decrease the effectiveness of the Plan and it continues to meet all 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 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: \_\_\_\_\_

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

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

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

E. Impact on the Updated FSAR

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

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

Additional Comments:

Prepared By: Audra Williams *Audra Williams* Date: 9/18/03  
(Print/Sign)

Reviewed By: Loei A. Thaczek *Loei A. Thaczek* Date: 10/28/03  
(Emergency Plan Coordinator) (Print/Sign)

VERMONT YANKEE NUCLEAR POWER STATION

**OPERATING PROCEDURE**

OP 3540

REVISION 3

**CONTROL ROOM ACTIONS DURING AN EMERGENCY**

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages
1	11/19/03	VYOPF 3540.01 Pg 1 of 1, VYOPF 3540.02 Pg 1 of 1, VYOPF 3540.03 Pg 1 of 1, VYOPF 3540.04 Pg 1 of 1 & VYOPF 3540.05 Pg 1 of 1

**Implementation Statement: N/A**

Issue Date: 04/02/03

## UNUSUAL EVENT IMMEDIATELY TERMINATED ANNOUNCEMENT

1. Before making the announcement, have the Shift Manager/Plant Emergency Director (SM/PED) authorize the prepared announcement.

SM/PED Authorization (print/sign)

Date \_\_\_\_\_

Time

2. Turn the PAGE SYS VOLUME & ALARM TONE SELECT switch to the ALERT position.

3. Turn the ALARM TONE CONTROL switch to the ON position for 10 seconds then return to the OFF position.

4. Make the following Gai-Tronics announcement:

**"Attention all personnel. Attention all personnel. UNUSUAL EVENT, UNUSUAL EVENT, UNUSUAL EVENT.**

**An UNUSUAL EVENT has been declared and immediately terminated at \_\_\_\_\_ hours.**

**There was** (*describe conditions and affected areas*).

5. Repeat the announcement.

6. Turn the PAGE SYS VOLUME & ALARM TONE SELECT Switch to the OFF position.

## UNUSUAL EVENT ANNOUNCEMENT

1. Before making the announcement, have the Shift Manager/Plant Emergency Director (SM/PED) authorize the prepared announcement.

\_\_\_\_\_  
SM/PED Authorization (print/sign)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Time

2. Turn the PAGE SYS VOLUME & ALARM TONE SELECT switch to the ALERT position.

3. Turn the ALARM TONE CONTROL switch to the ON position for 10 seconds then return to the OFF position.

### NOTE

Do not make plant announcement during a Code Red event.

4. Make the following Gai-Tronics announcement:

"Attention all personnel. Attention all personnel. UNUSUAL EVENT, UNUSUAL EVENT, UNUSUAL EVENT.

An UNUSUAL EVENT has been declared at \_\_\_\_\_ hours due to:

(describe conditions and affected areas) \_\_\_\_\_

The following personnel (if applicable) \_\_\_\_\_

report to \_\_\_\_\_

All other personnel stay clear of the affected area." (If applicable)

5. Repeat the announcement.

6. Turn the PAGE SYS VOLUME & ALARM TONE SELECT Switch to the OFF position.



## ALERT ANNOUNCEMENT

1. Before making the announcement, have the Shift Manager/Plant Emergency Director (SM/PED) authorize the prepared announcement.

\_\_\_\_\_  
SM/PED Authorization (print/sign)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Time

2. Turn the PAGE SYS VOLUME & ALARM TONE SELECT switch to the ALERT position.

3. Turn the ALARM TONE CONTROL switch to the ON position for 10 seconds then return to the OFF position.

### NOTE

Do not make plant announcement during a Code Red event.

4. Make the following Gai-Tronics announcement:

"Attention all personnel. Attention all personnel. ALERT, ALERT, ALERT.

An ALERT has been declared at \_\_\_\_\_ hours due to:

(describe conditions and affected areas) \_\_\_\_\_

Emergency personnel report to the Technical Support Center, the Operations Support Center, and the Emergency Operations Facility as required. As a precautionary measure, declared pregnant plant staff should leave the site and report to the EOF. All other personnel, visitors, and contractors should evacuate the site. [If applicable:] All other personnel stay clear of the affected area."

5. Repeat the announcement.

6. Turn the PAGE SYS VOLUME & ALARM TONE SELECT Switch to the OFF position.

## SITE AREA EMERGENCY ANNOUNCEMENT

1. Before making the announcement, have the Shift Manager/Plant Emergency Director (SM/PED) authorize the prepared announcement.

\_\_\_\_\_  
SM/PED Authorization (print/sign)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Time

2. Turn the PAGE SYS VOLUME & ALARM TONE SELECT switch to the EVACUATE position.

3. Turn the ALARM TONE CONTROL switch to the ON position for 10 seconds then return to the OFF position.

### NOTE

Do not make plant announcement during a Code Red event.

4. Make the following Gai-Tronics announcement:

"Attention all personnel. Attention all personnel. SITE AREA EMERGENCY, SITE AREA EMERGENCY, SITE AREA EMERGENCY.

A SITE AREA EMERGENCY has been declared at \_\_\_\_\_ hours due to:

(describe conditions and affected areas) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### NOTE

The following does not need to be announced if it was announced earlier at the ALERT declaration.

Emergency personnel report to the Technical Support Center, the Operations Support Center, and the Emergency Operations Facility as required. As a precautionary measure, declared pregnant plant staff should leave the site and report to the EOF. All other personnel, visitors, and contractors should report to the Emergency Operations Facility in Brattleboro. [If applicable:] All other personnel stay clear of the affected area."

5. Repeat the announcement.

6. Turn the PAGE SYS VOLUME & ALARM TONE SELECT Switch to the OFF position.

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Page 1 of 1

LPC #1

## GENERAL EMERGENCY ANNOUNCEMENT

1. Before making the announcement, have the Shift Manager/Plant Emergency Director (SM/PED) authorize the prepared announcement.

\_\_\_\_\_  
SM/PED Authorization (print/sign)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Time

2. Turn the PAGE SYS VOLUME & ALARM TONE SELECT switch to the EVACUATE position.
3. Turn the ALARM TONE CONTROL switch to the ON position for 10 seconds then return to the OFF position.

### NOTE

Do not make plant announcement during a Code Red event.

4. Make the following Gai-Tronics announcement:

**"Attention all personnel. Attention all personnel. GENERAL EMERGENCY, GENERAL EMERGENCY, GENERAL EMERGENCY.**

**A GENERAL EMERGENCY has been declared at \_\_\_\_\_ hours due to:**

*(describe conditions and affected areas)* \_\_\_\_\_

### NOTE

The following does not need to be announced if it was announced at the ALERT or SITE AREA declaration.

**Emergency personnel report to the Technical Support Center, the Operations Support Center, and the Emergency Operations Facility as required. As a precautionary measure, declared pregnant plant staff should leave the site and report to the EOF. All other personnel, visitors, and contractors should report to the Emergency Operations Facility in Brattleboro. [If applicable:] All other personnel stay clear of the affected area.**

5. Repeat the announcement.

6. Turn the PAGE SYS VOLUME & ALARM TONE SELECT switch to the OFF position.

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Page 1 of 1

LPC #1

# PREAPPROVED LPC FORM

## PART 1 - Initiation

☐ Converted to Admin. Revision #

LPC No: /

A. Procedure No.: <b>OP 3545</b>	Current Revision #: <b>2</b>	Title: <b>Activation of the EOF/RC</b>
B. Description of Change: <ul style="list-style-type: none"> <li>• Removed Communications Assistant and EOF Coordinator's Assistant positions.</li> <li>• Added ERF Activation time 900. (OPVY-2003-024-17)</li> <li>• Changed location of Aperture cards to RMS area.</li> <li>• Added fax machine to Rad Assess area and removed one from EOF area, (Figure 1)</li> </ul>		
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>OPVY-2003-024-17</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>pages 5&amp;6 of 6, Table 1 page 1 of 2, Table 2 Figure 1, page 1 of 1</u>		I. Originator (Print/Sign/Date) (Use AP 0096, App. A as a reference) (Complete & attach AP 0096 App. C, unless editorial) <b>Audra Williams 11/6/03</b> <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 <i>Don Q. Tkaczyk Lori A. Tkaczyk 11/6/03</i> (May perform Qualified Review) (N/A if editorial change)	B. Cross-Discipline Review(s) (Print/Sign/Date) <input type="checkbox"/> N/A <b>Audra Williams 11/6/03</b> <i>Audra Williams</i>
C. Qualified Review (Print/Sign/Date) (Use AP 0096, Appendix D, as a reference) <input type="checkbox"/> N/A <b>Audra Williams 11/6/03</b> (N/A if editorial change)	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) <b>11/9/03</b> <b>Brian M. Finn</b>	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 checked="" type="checkbox"/> N/A	
I. Effective Date: <b>11-19-03</b>	

CDS Initials *me*

VYAPF 0097.02

AP 0097 Rev. 3

Page 1 of 1

## 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 3545, Rev. 2, LPC #1

Reviewer/Date (Print) Audra Williams 11/6/03

### 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
<b>Chemistry:</b> <ul style="list-style-type: none"> <li>Potentially affects condensate, feedwater, or reactor water chemistry, or chemistry instruments.</li> <li>Procedures that implement the requirements of the VY Environmental Program. (see PP 7603, Appendix A)</li> <li>Produces/affects effluents or effluent monitoring (VY/QA 01-015).</li> <li>Affects NPDES limits or method of compliance.</li> </ul>		X
<b>Maintenance (Mech, Elec, I&amp;C):</b> <ul style="list-style-type: none"> <li>Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&amp;TE, lifting and landing of leads and connectors.</li> </ul>		X
<b>Operations:</b> <ul style="list-style-type: none"> <li>Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO.</li> <li>Requires Operations alignment/restoration of systems or components.</li> <li>Specifies surveillance or post maintenance testing by Operations.</li> </ul>		X
<b>EOP/SAG Coordinator:</b> <ul style="list-style-type: none"> <li>Procedures that have the potential to affect the EOPs/SAGs.</li> </ul>		X

<b>Quality Assurance:</b> <ul style="list-style-type: none"> <li>Compliance with QA Program requirements cannot be readily determined by the Qualified Reviewer.</li> </ul>		X
<b>Radiation Protection:</b> <ul style="list-style-type: none"> <li>Involves work in contaminated areas and high radiation areas.</li> <li>Involves work that breaches contaminated systems or components.</li> <li>Changes in radwaste or hazardous waste generation.</li> </ul>		X
<b>Emergency Plan Coordinator:</b> <ul style="list-style-type: none"> <li>Emergency Plan Implementing Procedures.</li> <li>Obtain and attach a 10CFR50.54(q) Evaluation.</li> <li>Affects Emergency Plan personnel, facilities or equipment.</li> </ul>	X	
<b>Software Quality Assurance Administrator</b> <ul style="list-style-type: none"> <li>Procedures that define how software is developed.</li> </ul>		X
<b>Reactor Engineering:</b> <ul style="list-style-type: none"> <li>Could affect core reactivity, thermal power, reactor heat balance, or fuel integrity.</li> <li>Involves refueling operations.</li> </ul>		X
<b>Systems/Project/Design Engineering:</b> <ul style="list-style-type: none"> <li>Maintenance Rule in-scope systems unavailability time.</li> <li>Involves infrequently performed test or evolution.</li> <li>Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO.</li> <li>Significant changes in system test or operation methodology.</li> </ul>		X
<b>Appendix J Coordinator:</b> <ul style="list-style-type: none"> <li>Changes that affect App. J leakrates or containment boundaries, or boundary valve manipulation.</li> </ul>		X
<b>Appendix R Coordinator:</b> <ul style="list-style-type: none"> <li>Appendix R implementing procedures.</li> </ul>		X
<b>Environmental Qualification (EQ) Coordinator:</b> <ul style="list-style-type: none"> <li>Change in EQ test methodology or component lifetime.</li> <li>Potentially affects area EQ component environment.</li> </ul>		X
<b>Fire Protection Coordinator (FPC):</b> <ul style="list-style-type: none"> <li>Fire Protection procedures.</li> <li>Affects fire loading</li> <li>Affects fire barrier integrity.</li> <li>Affects fire protection systems or component functionality.</li> </ul>		X
<b>IST Program Coordinator:</b> <ul style="list-style-type: none"> <li>Inservice Testing Program implementing procedures.</li> <li>All surveillance procedures.</li> </ul>		X
<b>ISI Program Coordinator:</b> <ul style="list-style-type: none"> <li>Inservice Inspection Program implementing procedures.</li> </ul>		X

<b>Setpoint Coordinator:</b> <ul style="list-style-type: none"> <li>Changes that impact setpoints, as-found/as-left tolerances, M&amp;TE or testing methodology.</li> </ul>		X
<b>Nuclear &amp; PRA</b> <ul style="list-style-type: none"> <li>Potentially affects IPEEE or ORAM Sentinel Risk Models.</li> <li>Potentially affects plant SSCs reliability.</li> <li>Potentially affects Nuclear or Radiological Safety Analysis.</li> </ul>		X
<b>Security:</b> <ul style="list-style-type: none"> <li>Procedures that implement the requirements of the VY Physical Security and Training and Qualification Plans.</li> <li>Changes that have a potential for reduction of the VY Physical Security and Training and Qualification Plan commitments.</li> <li>Obtain and attach a 10CFR50.54(P) Evaluation.</li> </ul>		X
<b>MOV Program Coordinator:</b> <ul style="list-style-type: none"> <li>Potentially affects system parameters for which MOV operation has been evaluated.</li> </ul>		X
<b>AOV Program Coordinator:</b> <ul style="list-style-type: none"> <li>Potentially affects system parameters for which AOV operation has been evaluated.</li> </ul>		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 3545, Rev. 2, LPC#1, Activation of the EOF/RC

### 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 10CFR50.47(b):

- (1) Assignment of Emergency Response Organization responsibilities
- (2) Assignment of on-shift Emergency Response Organization personnel
- (3) Arrangements for Emergency Response Support and Resources
- (4) Emergency Classification and Action levels, including facility system and effluent parameters
- (5) Notification Methods and Procedures
- (6) Emergency Communications among principal response organizations and the public
- (7) Public Education and Information
- (8) Adequacy of Emergency Facilities and Equipment
- (9) Adequacy of Accident Assessment methods, systems and equipment
- (10) Plume exposure pathway EPZ protective actions
- (11) Emergency Worker Radiological Exposure Control
- (12) Medical Services for contaminated injured individuals
- (13) Recovery and Reentry Plans
- (14) Emergency response periodic drills and exercises
- (15) Radiological Emergency Response Training
- (16) Plan development, review and distribution

YES	NO
X	
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X
	X



## 10 CFR 50.54(q) Evaluation Checklist (Continued)

YES	NO
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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)(1) and Appendix E, Section IV. A of Section A above, this change

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

#### BASIS FOR ANSWER:

The Communications Assistant position was removed as the responsibilities are being performed by other members of the ERO. OP 3545 will have a figure depicting phones to be tested and it will be the responsibility of the EOF to complete this at the time of the room setup. Three part message forms can be picked up by the few individuals who still use them. All phones and radios that need to be manned are assigned per other appendices of this procedure. Establishment of radio communications is the responsibility of the Rad Coordinator and the radio operator. Recording the date, time, parties involved for each incoming/outgoing message is the responsibility of each of the other positions as defined in the other appendices.

The EOF Coordinator's Assistant position was removed and the responsibilities became part of the EOF Coordinator position. This position was established prior to the E-Plan Duty Teams. The initial intent of the position was to be filled by whoever arrived first. They were to start setup and then inform the EOF Coordinator of any pertinent information upon his/her arrival. Because the EOF Coordinator is part of an E-Plan Duty Team, the expectation is that he/she would arrive within an hour which would now be prior to the Assistant. The couple of tasks that the Assistant had to perform were assumed by the EOF Coordinator.

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: \_\_\_\_\_

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

Document(s) affected: E-Plan, OP 3546, AP 0032

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: 11/6/03  
(Print/Sign)

Reviewed By: Lori A. Tkaczuk Lori A. Tkaczuk Date: 11/6/03  
(Emergency Plan Coordinator) (Print/Sign)

VERMONT YANKEE NUCLEAR POWER STATION

**OPERATING PROCEDURE**

OP 3545

REVISION 2

**ACTIVATION OF THE  
EMERGENCY OPERATIONS FACILITY/RECOVERY CENTER (EOF/RC)**

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages
1	11/19/03	3, 5 & 6 of 6, Table Pg 1 of 2, Table 2 Pg 1 of 1 & Figure 1 Pg 1 of 1

**Implementation Statement:** N/A

Issue Date: 04/02/03

## PURPOSE

To outline the actions required to activate the Emergency Operations Facility/Recovery Center (EOF/RC).

## DISCUSSION

The EOF/RC is activated depending on the classification of the emergency. There are four emergency classifications, Unusual Event, Alert, Site Area Emergency, and General Emergency. The decision to make an immediate initial declaration rests with the Shift Manager/Plant Emergency Director.

An Unusual Event is defined as any plant-related event which indicates a potential degradation of plant safety margins which is not likely to affect personnel on-site or the public off-site or result in radioactive releases requiring off-site monitoring. Unusual Event conditions will not have caused serious damage to the plant and may not require a change in operation status.

An Alert event is defined as an indication of a 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 protective action.

A Site Area Emergency indicates an event which involves likely or actual major failures of plant functions needed for the protection of the public. The possibility does exist for some releases of radioactive material and response to this event emphasizes the ability to monitor the releases and to provide action recommendations to State authorities and follow-up information as needed to off-site emergency organizations.

A General Emergency is declared when substantial core degradation or melting has occurred, with a potential for loss of containment integrity. The possibility does exist for releases of radioactive material and response to this event emphasizes the ability to monitor the releases and to provide for protective action recommendations to State authorities.

The first individual to arrive at the EOF is responsible for initiating this procedure following an emergency classification announcement.

I LPC  
1 Although response time will vary due to factors such as weather and traffic conditions, a goal of sixty (60) minutes for activation has been established for onsite emergency facilities including the EOF.

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 procedure scope is not changed. 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.

## PROCEDURE

### NOTE

Steps may be performed concurrently or out of sequence.

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

Time/Date

Initials

- 1.0 Establish the Emergency Operations Facility /Recovery Center for activation. (See Figures 1 & 2)

### NOTE

Key staff are required to sign in on the staffing board in the SRM area.

- 2.0 Assign personnel as required to the various functions in the Emergency Operations facility. (Complete Table 1)
- 3.0 Prepare facilities for the arrival of off-site authorities and other support personnel.
- 3.1. Obtain keys for the EOF Emergency Equipment Cabinets from the Training Building Security desk in the lobby and open cabinets. (See Table 2)
- 3.2. Organize rooms, equipment, status boards and maps per Figure 1. \_\_\_\_\_ / \_\_\_\_\_
- 3.3. Turn on ERFIS PCs (3) and monitors located at the EOF/RC (per Figure 1) and display current meteorological data. \_\_\_\_\_ / \_\_\_\_\_
- 3.3.1. Click on ODPS.
- 3.3.2. Click on Historical Meteorological Data – 1.
- 3.4. Contact Manpower and Planning to have an individual from IT move the color printer located on second floor of the Training Bldg and connect it to the ERFIS PC in Room 122. \_\_\_\_\_ / \_\_\_\_\_
- 3.5. Check radios per OP 3504, Section F.4.a. and Figures 6 and 10. (OSMT Communications Area) \_\_\_\_\_ / \_\_\_\_\_
- 3.6. Deleted

- 3.7. Place ERF Directories in Rad Assessment Area and Communications Area.

\_\_\_\_\_/\_\_\_\_\_  
\_\_\_\_\_

## FINAL CONDITIONS

### NOTE

Minimum staffing for activation of the EOF/RC includes:

- Site Recovery Manager
- EOF Coordinator
- Radiological Assistant
- SRM Compliance Advisor
- SRM Ops Advisor #1

ILPC1

Time/Date

Initials

- ILPC1
1. All required positions on Table 1 are filled.
  2. Report to the EOF/RC Coordinator that the EOF/RC is ready for Activation.
  3. Report to SRM that EOF is ready for activation.
  4. Return completed procedure to the Emergency Plan Coordinator for filing in accordance with AP 6807.

\_\_\_\_\_/\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_/\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_/\_\_\_\_\_  
\_\_\_\_\_

**TABLE 1**  
**PERSONNEL ASSIGNMENT LIST**

<b>Required for Activation</b>	<b>Personnel</b>
Site Recovery Manager	_____
EOF Coordinator	_____
Radiological Assistant	_____
I LPC 1 SRM Compliance Advisor (required to assume communication function)	_____
SRM Ops Advisor #1	_____
<b>Positions to be Staffed</b>	<b>(not required for activation)</b>
Purchasing Coordinator	_____
Radiological Coordinator	_____
Nuclear Information Director	_____
SRM Ops Advisor #2	_____
I LPC 1 SRM State Advisor	_____
JNC Technical Representative	_____
SRM Media Advisor	_____
SRM Radiological Advisor	_____

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

<b>Cabinet No.</b>	<b>Location</b>
1	In the Site Recovery Manager's Office area.
2	In the hallway outside room 126, contains equipment for Room 125/126 and EOF Engineers.
3	In the Hallway across from the Chemistry Lab, contains equipment for use by the Radiological Assistant and staff.
4	In the hallway across from the Chemistry Lab, contains equipment for use by the Radiological Assistant and staff.

**Other Equipment Areas to be opened**

Sprinkler Room (back of room 118) contains equipment for the Radiological Assistant and staff, Manpower/Planning and Personnel & Equipment Monitoring.

State Cabinets in Room 117. Upper and Lower cabinets. Contain equipment for the State EOF responders. DO NOT REMOVE EQUIPMENT FROM THESE CABINETS - just open them.

**EOF Engineering Equipment**

Aperture cards, reader and printer are located on the second floor of the Training Building in the Records Management Services area.

Mini-Prints are located on the network and can be printed to any of the Canon copiers that contain 11 x 17 paper, or  
Uncontrolled hard copies are available in the TIC and Room 128.

Vendor Manuals are located at the Plant and PSB.



FIGURE 1

EOF/RC FOOTPRINT SAMPLE

