



Entergy Nuclear Northeast
Vermont Yankee
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February 25, 2004
BVY 04-019

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 3524, Rev. 20, LPC#1
OP 3542, 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,

A handwritten signature in cursive script, appearing to read "Lori Tkaczyk".

Lori Tkaczyk
Emergency Planning Manager

Attachments

cc: USNRC Region 1 Administrator
USNRC Resident Inspector – VYNPS
USNRC Project Manager – VYNPS (no attachments)
David M. Silk, Senior Emergency Preparedness Specialist,
USNRC Region 1
Vermont Department of Public Service

A045

E-Plan Implementing Plant Procedures

To: E-Plan Implementing Procedure Controlled Set Holders
From: Technical Support - DCC - Ann M. Pichette - MC 1220
Date: February 25, 2004
Re: Entergy Vermont Yankee Emergency Plan Implementing Procedure Change #225,
Instruction Sheet

A new Table of Contents is included. Replace Table of Contents dated January 21, 2004 with new Table of Contents dated February 25, 2004.

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

<u>Proc/Rev #</u>	<u>LPC #</u>	<u>Procedure Title</u>
OP 3524/20	1	Emergency Actions to Ensure Initial Accountability and Security Response
OP 3542/2	1	Operation of the Technical Support Center (TSC)

Vermont Yankee Emergency Plan Implementing Procedures				
Table of Contents				
February 25, 2004				
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. 44		"Reference"
Emergency Radiation Exposure Control	OP 3507	Rev. 30	1	"Reference"
On-Site Medical Emergency Procedure	OP 3508	Rev. 24	1	"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	1	"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	1	"Reference"
Radiological Coordination	OP 3525	Rev. 11		"Reference"
Emergency Call-In Method	OP 3531	Rev. 17		"Reference"
Emergency Preparedness Organization	AP 3532	Rev. 11	1	"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	1	"Reference"
Operation of the Technical Support Center (TSC)	OP 3542	Rev. 2	1	"Reference"
Activation of the Operations Support Center (OSC)	OP 3543	Rev. 0	1	"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	1	"Reference"
Emergency Plan Training	OP 3712	Rev. 17	1	"Information"

PREAPPROVED LPC FORM

PART 1 – Initiation

Converted to Admin. Revision #

LPC No: 1

A. Procedure No.: OP 3524	Current Revision #: 20	Title: Emergency Actions to Ensure Initial Accountability and Security Response
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B. Description of Change:

Changed I.A.NOTE:

- Plant workers and contractors should leave their Electronic Dosimeters (if any) at the main RP checkpoint and clip their TLD to their security badge and drop both in the Security badge collection bin as usual before exiting Gate 2.
- Visitors should leave their Electronic Dosimeters (if any) at the main RP checkpoint and drop their TLDs in the TLD drop box located to the left of the Gate 2 PM-7 Whole Body Contamination Monitor before exiting Gate 2.

Added to B.1. & C.1. ... proceed to Gatehouse 2, turn in badge and TLD, and....
 Added to B.2. retrieve vehicle from parking lot, travel....
 Added to II.A.1.a. & II.A.1.b. & II.A.4.a. & II.A.4.b. & II.B.1.a. & II.B.1.b. ... identification badges, and card keys and TLDs in the proper...
 Change IV.C. to: All other plant personnel and contractors shall....
 Change IV.C.1. to: Without delay, leave their Electronic Dosimeters (if any) at the main RP checkpoint and clip their TLD to their security badge and drop both in the Security badge collection bin as usual before exiting Gate 2.
 Change IV.D. to: Contractor employees and Visitors shall evacuate the site....
 Remove NOTE following IV.D.
 Change IV.D.1. to: Without delay, leave their Electronic Dosimeters (if any) at the main RP checkpoint and drop their TLDs in the TLD drop box located to the left of the Gate 2 PM-7 Whole Body Contamination Monitor before exiting Gate 2.

C. Reason for Change:

Result of Design Change, Minor Mod, EDCR _____

Related ER No. _____ - _____

Other: LO-VTYLO-2003-00391

Editorial

D. Duration: Permanent One Time Only

E. Surveillance Database Change? Yes, change submitted No

F. Procedure Type: Technical Admin. (AP,PP)

G. AP 0091, Risk Assessment Yes No

H. Page(s) affected: pgs 5, 6, 8, 10, 13, 14 of 17

I. Originator (Print/Sign/Date)
 (Use AP 0096, App. A as a reference)
 (Complete & attach AP 0096 App. C, unless editorial)

Audra Williams 1/13/04
Audra Williams

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 Lorin A. Tkaczyk <i>Lorin A. Tkaczyk</i> 1/15/04 (May perform Qualified Review) (N/A if editorial change)	B. Cross-Discipline Review(s) (Print/Sign/Date) <input type="checkbox"/> N/A Audra Williams 1/13/04 <i>Audra Williams</i>
C. Qualified Review (Print/Sign/Date) (Use AP 0096, Appendix D, as a reference) <input type="checkbox"/> N/A Audra Williams 1/13/04 <i>Audra Williams</i> (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) Brian M. Finn <i>Brian M. Finn</i> 1/19/04	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)

N/A

e-mail to Security

I. Effective Date:

2/25/04

CDS Initials *amp*

10 CFR 50.54(q) Evaluation Checklist

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

OP 3524, Rev. 20, LPC#1, Emergency Actions to Ensure Initial Accountability and Security Response

A. Screening Evaluation

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

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

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

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

10 CFR 50.54(q) Evaluation Checklist (Continued)

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 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:

The change in the location of the drop off for electronic dosimeters is due to the fact that the TLD board in Gatehouse 2 was removed. Electronic dosimeters will now be required to be returned to RP checkpoint. The change also specifies that the TLDs will be attached to individuals' badges and dropped in the slot when exiting GH2.

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, NUREG-0654 Cross Reference)

Keywords used in search: electronic dosimeter

- 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:

No impact on the USFAR

Prepared By: Audra Williams *Audra Williams* Date: 1/13/04
(Print/Sign)

Reviewed By: Lori A. Tkaczyk *Lori A. Tkaczyk* Date: 1/15/04
(Emergency Plan Coordinator) (Print/Sign)

**APPENDIX C
CROSS-DISCIPLINE REVIEW CHECKLIST**

Required to be completed for new procedures, procedure revisions, and LPCs.

Not required for procedure revisions designated as Editorial

Procedure Number/Revision OP 3524 Rev. 20 LAC #1
 Reviewer/Date (Print) Lori Tkaczyk 2/18/04

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 Supervisor, Office Services-DCC maintains a list of these Administrative and Program Procedures.
- ALL noneditorial changes to Special Process procedures (WP, NE, heat treating, etc.), including Vendor Procedures that address Special Processes, shall be reviewed by: a Welding Engineer (welding procedures) or a NDE Level III certified in the method addressed by the procedure (nondestructive examination procedures), AND the Quality Assurance Manager, AND submitted to the Authorized Nuclear Inservice Inspector (ANII) prior to use.
- A "YES" indicates that a Cross Discipline Review shall be done by the indicated Department. Document the review on VYAPF 0096.01, VYAPF 0097.01, or VYAPF 0097.02, as applicable.

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

APPENDIX C (Continued)

	APPLICABLE	
	YES	NO
Quality Assurance: <ul style="list-style-type: none"> Compliance with QA Program requirements cannot be readily determined by the Qualified Reviewer. 		X
Radiation Protection: <ul style="list-style-type: none"> Involves work in contaminated areas and high radiation areas. Involves work that breaches contaminated systems or components. Changes in radwaste or hazardous waste generation. 		X
Emergency Plan Coordinator: <ul style="list-style-type: none"> Emergency Plan Implementing Procedures. Obtain and attach a 10CFR50.54(q) Evaluation. Affects Emergency Plan personnel, facilities or equipment. 	X	
Software Quality Assurance Administrator <ul style="list-style-type: none"> Procedures that define how software is developed. 		X
Reactor Engineering: <ul style="list-style-type: none"> Could affect core reactivity, thermal power, reactor heat balance, or fuel integrity. Involves refueling operations. 		X
Systems/Project/Design Engineering: <ul style="list-style-type: none"> Maintenance Rule in-scope systems unavailability time. Involves infrequently performed test or evolution. Changed requirements for entry into a Limiting Condition for Operation (LCO) or significantly changes duration of LCO. Significant changes in system test or operation methodology. 		X
Appendix J Coordinator: <ul style="list-style-type: none"> Changes that affect App. J leakrates or containment boundaries, or boundary valve manipulation. 		X
Appendix R Coordinator: <ul style="list-style-type: none"> Appendix R implementing procedures. 		X
Environmental Qualification (EQ) Coordinator: <ul style="list-style-type: none"> Change in EQ test methodology or component lifetime. Potentially affects area EQ component environment. 		X
Fire Protection Coordinator (FPC): <ul style="list-style-type: none"> Fire Protection procedures. Affects fire loading Affects fire barrier integrity. Affects fire protection systems or component functionality. 		X
IST Program Coordinator: <ul style="list-style-type: none"> Inservice Testing Program implementing procedures. All surveillance procedures. Relief Valves, Check Valves, MOV and AOV Program Procedures (SURV2002-025_03). 		X
ISI Program Coordinator: <ul style="list-style-type: none"> Inservice Inspection Program implementing procedures. 		X

APPENDIX C (Continued)

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

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3524

REVISION 20

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

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages
1	2/25/04	5, 6, 8, 10, 13 & 14 of 17

Implementation Statement: N/A

Issue Date: 04/02/03

PROCEDURE

NOTE

If an emergency classification is entered due to a Security condition, then evacuation and performing accountability may put personnel at risk. Therefore, in these situations evacuation and accountability will be suspended until directed by Security.

I. Personnel Evacuation in the Event of an Alert

On notification of an Alert condition by alarm or verbal report, the following actions shall be taken to ensure personnel (including contractors and visitors) site evacuation:

A. Plant emergency response personnel shall:

1. without delay, proceed to the plant Administration Building and report, as required, to the TSC or OSC,
2. upon arrival, promptly check in using VYOPF 3524.02 where indicated,
3. take actions as required by their duty assignment.

NOTES

- Plant workers and contractors should hang their Dositec (if any) along with their TLD on the dosimetry rack in Gatehouse 2. Visitors should turn in Dositecs (if any), clipped together with their visitor's badge and TLD, to the Access Control Officer (ACO) or as directed.
- During emergency evacuation periods due to a declared event, the portal monitor at Gatehouse 2 may be bypassed per DP 4532.

B. All personnel assigned to the EOF shall:

1. without delay, proceed to Gatehouse 2, turn in badge and TLD, and leave the Protected Area (PA) as normal,
2. retrieve their vehicle from parking lot, travel to the EOF and, upon arrival, promptly check in at the front desk of the Training Center.

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LPC 1
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- C. All unassigned individuals (plant personnel, contractors, and visitors) shall:
1. without delay, proceed to Gatehouse 2, turn in badge and TLD, and leave the Protected Area (PA) as normal,
 2. Retrieve their vehicle from parking lot and leave site.
- D. Security Shift Supervisor(s) (SSS) shall, as necessary:
1. supplement security shift staffing,
 2. request local law enforcement support.

NOTE

If an emergency classification is entered due to a Security condition, then evacuation and performing accountability may put personnel at risk. Therefore, in these situations evacuation and accountability will be suspended until directed by Security.

II. Initial Personnel Accountability in the Event of an Alert

On notification of an Alert condition by alarm or verbal report, actions shall be taken to ensure personnel (including contractors and visitors) accountability. The accountability process to be used will be determined by activation of the TSC during normal or off-normal hours.

A. During normal hours:

1. The Access Control Officer (ACO) shall direct security personnel to:
 - a. ensure that all evacuating personnel deposit their identification badges, card keys and TLDs in the proper collection slots and promptly exit the Gatehouse,
 - b. immediately return all identification badges, card keys and TLDs to their proper slots in the badge rack,
 - c. obtain an On-Site report from the security computer when personnel have evacuated the Protected Area (PA) and inventory the Visitor's Log,
 - d. initiate VYOPF 3524.01.

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- e. report the status of the accountability process to the TSC and the name(s) of any unaccounted for personnel, within 30 minutes of the announcement of the emergency classification,

NOTE

If the process is not complete at the time of this report another notification to the TSC is required upon completion.

- f. place colored pegs in the badge rack slots indicating those personnel unaccounted for.
4. When an On-Site computer report is not available, the ACO shall:
- a. ensure that all personnel deposit their identification badges, card keys and TLDs in the proper collection slots and promptly exit the Gatehouse,
 - b. immediately return all identification badges, card keys and TLDs to their proper slots in the badge rack,
 - c. initiate VYOPF 3524.01,

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NOTE

The ACO shall contact the TSC to ascertain the status of the VYOPF 3524.02's (check-in sheets) if they are not delivered following the evacuation of personnel.

- d. following site evacuation numerically inventory by slot number the empty slots in the identification badge rack and the Visitor's Log, if applicable,

NOTE

During the time after the inventory list is compiled and before the process is complete, individuals who leave site must be deleted from the list in order to avoid appearing unaccounted for.

- e. assign an individual to read off the gatehouse slot number and name from the VYOPF 3524.02's and the Visitor's Log, if applicable,

6. The ACO shall:

- a. delete the individual from VYOPF 3524.01 as appropriate,
- b. remove the colored peg from the individual's badge rack slot.

B. During off-normal hours:

1. the ACO shall direct security personnel to:

- a. ensure that all evacuating personnel deposit their identification badges, card keys and TLDs in the proper collection slots and promptly exit the Gatehouse,
- b. immediately return all identification badges, card keys and TLDs to their proper slots in the badge rack,
- c. obtain an On-Site report from the security computer when personnel have evacuated the PA and inventory the Visitor's Log, if applicable,

NOTE

If an On-Site report from the security computer is unavailable, perform accountability in accordance with step A.4.

- d. initiate VYOPF 3524.01,
- e. verify the well-being and accountability of each individual listed on the On-Site report, by contacting the senior supervisor for each department currently on site,

NOTE

If there is someone listed as on-site who cannot be accounted for by a supervisor, they will need to be located individually via Gai-Tronics or other means.

- f. check off the corresponding name and slot number on the On-Site report,
- g. note on the On-Site report the name(s) of the supervisors verifying well-being,

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C. Posting of CO₂ Hazard Signs

1. When directed by the Fire Brigade Commander, the SSS shall dispatch a security officer(s) to post "CO₂ Hazard" signs on the doors indicated in Figures 1 through 4.
2. The security officer(s) shall post the signs on the doors indicated on Figures 1 through 4.

NOTE

If an emergency classification is entered due to a Security condition, then evacuation and performing accountability may put personnel at risk. Therefore, in these situations evacuation and accountability will be suspended until directed by Security.

IV. Personnel Evacuation in the Event of a Site Area Emergency or General Emergency Which Has Not Been Preceded by the Declaration of an Alert

The following actions shall be taken to ensure personnel (including contractors and visitors) site evacuation:

- A. Any personnel exiting a known contamination area shall report to the Radiation Protection Control Point to be monitored and receive further instructions from Radiation Protection personnel.
- B. Plant emergency response personnel shall take actions as previously described in the Alert notification and required by their duty assignment.
- C. All other plant personnel and contractors shall evacuate the site as follows:
 1. Without delay, leave their Electronic Dosimeters (if any) at the main RP checkpoint and clip their TLD to their security badge and drop both in the Security badge collection bin as usual before exiting Gate 2.
 2. Retrieve their vehicle from parking lot and proceed to the Emergency Operations Facility/Recovery Center (EOF/RC).

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D. Visitors shall evacuate the site as follows:

1. Without delay, leave their Electronic Dosimeters (if any) at the main RP checkpoint, drop their TLDs in the TLD drop box located to the left of the Gate 2 PM-7 Whole Body Contamination Monitor and hand their badge to the security officer before exiting Gate 2.
2. Retrieve their vehicle from the parking lot and proceed to the Emergency Operations Facility/Recovery Center (EOF/RC).

NOTE

If an emergency classification is entered due to a Security condition, then evacuation and performing accountability may put personnel at risk. Therefore, in these situations evacuation and accountability will be suspended until directed by Security.

- V. Personnel Accountability in the Event of a Site Area Emergency or General Emergency, Not Preceded by the Declaration of an Alert
(See Section I - Shall be the same as in the Alert notification.)

PREAPPROVED LPC FORM

PART 1 - Initiation

Converted to Admin. Revision #

LPC No: |

A. Procedure No.: OP 3542	Current Revision #: 2	Title: Operation of the TSC
B. Description of Change: LO-VTYLO-2003-0680 CA 00010 - Add step 1.21.1 - TSCC shall announce to the TSC staff the status of the accountability of site personnel upon notification by Security of it's completion. Added to 2.4: <u>If ERFIS is unavailable, notify control room....</u>		
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>LO-VTYLO-2003-0680 CA 00010</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) Audra Williams 1/12/04 <i>Audra Williams</i>	
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>pgs 10, of 16</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>Lori A. Kaczyk</i> <i>1/12/04</i> (May perform Qualified Review) (N/A if editorial change)	B. Cross-Discipline Review(s) (Print/Sign/Date) <input type="checkbox"/> N/A Audra Williams 1/12/04 <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> 1/12/04 (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) <i>1/13/04</i> <i>Brian M. Finn</i> (N/A if editorial change)	F. IF 50.59 Evaluation: <input checked="" type="checkbox"/> N/A PORC Mtg. Date: _____
G. Plant Manager (Print/Sign/Date) (SPs only) N/A	
H. Training: (Required for Admin Procedures, unless editorial) <input type="checkbox"/> N/A E-Mail to TSCC	
I. Effective Date: February 25 th , 2004	

CDS Initials *amp*

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 3542, Rev. 2, LPC#1, Operation of the TSC

A. Screening Evaluation

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

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

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

1. Could the proposed change affect our ability to meet the following standards of 10CFR50.47(b):

YES	NO
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- (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

	X
	X
	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. N/A of Section A above, this change

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

BASIS FOR ANSWER:

This change is an enhancement to the procedure and allows personnel to be aware of the accountability status. This does not change the accountability process or Security/TSCC's responsibilities.

Plant Parameter sheets are to be used only if ERFIS is unavailable. The added instruction reminds the TSC of this.

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: there is no impact on the UFSAR

Additional Comments:

Prepared By: Audra Williams *Audra Williams* Date: 1/12/04
(Print/Sign)

Reviewed By: Lori Tkaczyk *Lori Tkaczyk* Date: 1/12/04
(Emergency Plan Coordinator) (Print/Sign)

**APPENDIX C
CROSS-DISCIPLINE REVIEW CHECKLIST**

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

Procedure Number/Revision OP 3542, Rev. 2, LPC #1

Reviewer/Date (Print) Audra Williams 2/25/04

GENERAL REVIEW GUIDELINES/SPECIAL REVIEW REQUIREMENTS

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

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

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

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

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3542

REVISION 2

OPERATION OF THE TECHNICAL SUPPORT CENTER (TSC)

USE CLASSIFICATION: REFERENCE

LPC No.	Effective Date	Affected Pages
1	2/25/04	10 & 12 of 16

Implementation Statement: N/A

Issue Date: 04/02/03

Time/Date

Initials

NOTE

Accountability may be suspended if the safety of personnel may be jeopardized by a security event or other event hazardous to personnel.

1.18. Direct a staff member to perform initial and continuous personnel accountability of the TSC, OSC and CR personnel as stipulated in, Appendix A, Personnel Accountability Check, and OP 3524 guidance. (circle event)
A S G
_____ / _____

1.19. When notified by Security that the initial accountability check has been completed, contact the SRM at the EOF to report status (including any missing personnel).
_____ / _____

1.20. IF any persons are reported missing during the accountability checks, THEN perform the following steps:

1.20.1. Page the unaccounted for individual(s) in an attempt to locate them,

1.20.2. As necessary, direct the OSC Coordinator to dispatch an on-site search and rescue team to locate the individual(s), and,

1.20.3. Inform the Security Access Control Officer once the individual(s) are located.

1.21. Once accountability is complete, make decision regarding further disposition of company and contractor evacuees, either to stand by or leave the site completely.

1.21.1. TSCC shall announce to the TSC staff the status of the accountability of site personnel upon notification by Security of its completion.
_____ / _____

NOTE

If ERFIS is not available, the assigned individual (in Step 1.22) will also relay appropriate meteorological and radiological information to the Radiological Assistant at the EOF.

1.22. When necessary, assign an individual to report to the Control Room to relay appropriate radiological information to the RP Checkpoint. (circle event)
A S G
_____ / _____

LPC
|
1

Time/Date

Initials

2.0 Subsequent Actions

NOTE

Activation of the TSC and the EOF constitutes an ALERT per AP 3125.

- 2.1. Initiate the escalation of the emergency classification as conditions warrant. IF conditions warrant escalation to a GENERAL EMERGENCY, THEN implement OP 3511, "Off-Site Protective Action Recommendations." (circle event)
A S G
_____/_____

- 2.2. If warranted, ensure that manpower and planning is being conducted to provide for response efforts over an extended period. (circle event)
A S G
_____/_____

- 2.3. If the NRC requests an open, continuous ENS communications channel (FTS ENS Phone), assign a technically competent individual to continuously maintain the FTS ENS Phone (LAI-801). (circle event)
A S G
Name: _____/_____

- 2.4. If ERFIS is unavailable, notify the Control Room that the TSC is assuming responsibility for transmitting plant parameter sheets to the EOF. (VYOPF 3504.02) _____/_____

- 2.5. After consultation with the OSC Coordinator, notify the Control Room that the TSC is assuming responsibility for deployment of the AOs. _____/_____

LPC
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NOTE

Refer to OP 3504 to establish the HPN channel.

- 2.6. If the NRC requests an open, continuous Health Physics Network (HPN) Communications Channel, assign a technically competent individual to continuously maintain the HPN phone until relieved by the EOF staff (LAI-801). (circle event)
A S G
Name: _____/_____
