

YANKEE ATOMIC ELECTRIC COMPANY

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U.S. Nuclear Regulatory Commission
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Reference: License No. DPR-3 (Docket No. 50-29)

Pursuant to 10 CFR 50.54(q) and 10 CFR 50.4(b)(5) of the Commission's Rules and Regulations, Yankee Atomic Electric Company (YAEC) herein submits the report evaluating YAEC's most recent changes (*Change No. 13*) to the ISFSI Emergency Plan for the Yankee Nuclear Power Station. These changes were made within the past 30 days and do not reduce the effectiveness of the YNPS ISFSI Emergency Plan, and the Plan continues to meet the standards set forth in 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

Should you have any questions regarding this submittal, please contact the undersigned at (301) 916-3995 or Mr. Frederick Williams at (413) 424-2380.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



Alice C. Carson
Licensing Manager

acc/acc

Enclosures: as stated

cc: S. Collins, NRC Region I Administrator
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Yankee ISFSI Emergency Plan
10CFR50.54(q) Decrease In Effectiveness Review
Revision 13

Describe the proposed change(s) to the Emergency Plan:

1. Revise Section 2.0, "Definitions" to delete "Projected Dose", and "Spent Fuel Pit" and redefine "Industrial Area" as "General Site Area".
2. Revise Section 3.0 fourth paragraph to remove sentence describing an onsite exercise.
3. Revise Section 4.3 to change "Industrial Area" to "General Site Area" and to remove discussion of airborne release of radioactive materials during decommissioning and dismantlement.
4. Revise Section 6.1.1.1 to change "Industrial Area" to "General Site Area".
5. Revise Section 6.1.1.2 to remove "Alternate Emergency Response Facility" to allow the designation of an "Incident Command Post", changed first paragraph to indicate the intended use of the facility for security related event.
6. Revise Section 6.1.2 to delete Section 6.1.2.1, "Onsite Assembly Areas" with associated text; delete Section 6.1.2.2 "Off Site Assembly Area" as a heading; and incorporate text under 6.1.2. Delete identification of specific locations for offsite assembly areas and allow for the designation of safe areas by the ISFSI Shift Supervisor/Incident Director.
7. Revise Section 6.1.3.2 to remove discussion of emergency helicopter transport.
8. Delete Table 6.1 "Emergency Equipment Inventory"
9. Revise Section 7.2 to remove testing description for Satellite Phone.
10. Delete Section 7.5 "Pagers" and associated text.
11. Revise Section 8.1 to indicate that the support to the ISFSI is provided by the ISFSI Support staff and contracted personnel.
12. Section 8.2, second paragraph, delete last sentence.
13. Revise Section 8.2.1, last paragraph to remove mention of "Incipient Fire Brigade" and assign responsibility for coordination of fire fighting response to ISFSI Security personnel.
14. Revise Section 8.2.2 "Augmented Organization" to remove specific position titles and allow for personnel to be provided through contract services.
15. Add Section 8.2.2.1, "Incident Director" describing the roles, responsibilities, authorities and accountabilities assigned to this position during and emergency.
16. Add Section 8.2.2.2, "Support Staff" describing the activities that may be performed by support staff personnel.
17. Revise Section 9.2, ninth bullet to replace "Public Affairs Representative" with "ISFSI Shift Supervisor/Incident Director, or designee".
18. Minor editorial changes to Section 9.4.
19. Section 10.0, revise first paragraph to delete periodic radiation surveys of the ISFSI and VCCs as a means to detect abnormal increases in radiation levels.
20. Minor editorial changes to Section 10.0, third paragraph for clarity.
21. Section 10.1, revise to replace reference to Radiological Assessment Coordinator with radiation monitoring personnel and remove reference to Section 6 for a listing of monitoring equipment.
22. Revise section 10.1, second paragraph to remove mention of RAC.
23. Revise section 10.2, numerous locations to remove mention of RAC and replace with ISFSI Shift Supervisor/Incident Director as appropriate.

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24. Revise Section 10.3.1, second paragraph, for clarity and to remove reference to Administration/Training building and Furlon House. Replace with designated assembly area.
25. Revise Section 10.3.1, third paragraph to replace reference to Alternate ERF and Furlon House with alternate location.
26. Revise Section 10.3.2 to replace RAC with Incident Director and clarify decontamination description.
27. Revise Section 10.3.4 to remove reference to issuing respirators.
28. Revise Section 11.1.1 to clarify announcements and remove mention of pagers.
29. Revise Section 11.2 to remove Yankee Public Affairs Representative and replace with ISFSI Shift Supervisor/ Incident Director or designee.
30. Revise Section 12.1.1 to add an annual Radiological Monitoring Drill.
31. Revise Section 12.1.1 to remove monthly pager tests with onsite emergency response organization.
32. Revise Annual medical drill to remove contamination as an drill complication.
33. Revise Section 12.1.1 to remove annual simulated augmentation drill.
34. Revise Section 12.1.1 to allow performance of fire drill in accordance with the Fire Protection Program.
35. Revise Section 12.3.2 to change from "Local Medical Support Personnel" to "Offsite Assistance Training" and delete Section 12.3.3 "Local Fire Fighting Support Training". Combine the text of the deleted and changed sections into a broad commitment to offer training to responders on an annual basis.
36. Revise Section 12.4 to change frequency of phone number verifications from Semi-annually to Quarterly.
37. Revise Section 12.6 to remove the Emergency Plan Coordinator and assign all responsibilities to the ISFSI Operations Manager.
38. Revise Section 12.6 to remove the Quality Assurance Manager.
39. Revise Appendix A to remove Memorandum of Understanding with Vermont Yankee.
40. Revise Appendix B to remove the Alternate Emergency Response Facility Readiness Check Implementing Procedure.
41. Revise Appendix B to add the Yankee Atomic Electric Company Integrated Response Plan to the list of supporting plans.
42. Delete Appendix C.
43. Typographic corrections, various locations.

Do the individual changes decrease the effectiveness of the ISFSI Emergency Plan? YES/NO

Do the collective changes decrease the effectiveness of the ISFSI Emergency Plan? YES/NO

Describe in detail the thought process used to arrive at the conclusion. Refer to NRC criteria/standards, etc. Provide attachments if necessary.

The proposed changes were reviewed (individually and collectively) and it has been concluded that these changes do not decrease the effectiveness of the Yankee ISFSI Emergency Plan. Refer to Section 3.0 of the enclosed Attachment for details for each of the conclusions.

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Does the plan, as changed, continue to meet 10CFR50.47(b) Standards and Appendix E Requirements that apply to the Yankee ISFSI Emergency Plan (i.e. is the plan still in agreement with the exemptions granted by the Nuclear Regulatory Commission on October 3, 1992)?

YES NO

Indicate which standard/requirement is germane to this change and describe how legal requirements continue to be met. Provide attachments if necessary.

The plan, as changed, continues to meet the regulatory standards and requirements as modified (i.e. 10CFR50.47(b)(4), (b)(8), (b)(9), (b)(12), and 10CFR50 Appendix E.IV.B, and E.IV.E).

See Section 4.0 of the Attachment for details on the standards and requirements.

Attachment

1.0 INTRODUCTION

The following changes being made to the ISFSI Emergency Plan:

1. Revise Section 2.0, "Definitions" to delete "Projected Dose", and "Spent Fuel Pit" and redefine "Industrial Area" as "General Site Area".
2. Revise Section 3.0 fourth paragraph to remove sentence describing an onsite exercise.
3. Revise Section 4.3 to change "Industrial Area" to "General Site Area" and to remove discussion of airborne release of radioactive materials during decommissioning and dismantlement.
4. Revise Section 6.1.1.1 to change "Industrial Area" to "General Site Area".
5. Revise Section 6.1.1.2 to remove "Alternate Emergency Response Facility" to allow the designation of an "Incident Command Post", changed first paragraph to indicate the intended use of the facility for security related event.
6. Revise Section 6.1.2 to delete Section 6.1.2.1, "Onsite Assembly Areas" with associated text; delete Section 6.1.2.2 "Off Site Assembly Area" as a heading; and incorporate text under 6.1.2. Delete identification of specific locations for offsite assembly areas and allow for the designation of safe areas by the ISFSI Shift Supervisor/Incident Director.
7. Revise Section 6.1.3.2 to remove discussion of emergency helicopter transport.
8. Delete Table 6.1 "Emergency Equipment Inventory"
9. Revise Section 7.2 to remove testing description for Satellite Phone.
10. Delete Section 7.5 "Pagers" and associated text.
11. Revise Section 8.1 to indicate that the support to the ISFSI is provided by the ISFSI Support staff and contracted personnel.
12. Section 8.2, second paragraph, delete last sentence.
13. Revise Section 8.2.1, last paragraph to remove mention of "Incipient Fire Brigade" and assign responsibility for coordination of fire fighting response to ISFSI Security personnel.
14. Revise Section 8.2.2 "Augmented Organization" to remove specific position titles and allow for personnel to be provided through contract services.
15. Add Section 8.2.2.1, "Incident Director" describing the roles, responsibilities, authorities and accountabilities assigned to this position during and emergency.
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17. Revise Section 9.2, ninth bullet to replace "Public Affairs Representative" with "ISFSI Shift Supervisor/Incident Director, or designee".
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19. Section 10.0, revise first paragraph to delete periodic radiation surveys of the ISFSI and VCCs as a means to detect abnormal increases in radiation levels.
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21. Section 10.1, revise to replace reference to Radiological Assessment Coordinator with radiation monitoring personnel and remove reference to Section 6 for a listing of monitoring equipment.
22. Revise section 10.1, second paragraph to remove mention of RAC.
23. Revise section 10.2, numerous locations to remove mention of RAC and replace with ISFSI Shift Supervisor/Incident Director as appropriate.
24. Revise Section 10.3.1, second paragraph, for clarity and to remove reference to Administration/Training building and Furlon House. Replace with designated assembly area.
25. Revise Section 10.3.1, third paragraph to replace reference to Alternate ERF and Furlon House with alternate location.
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27. Revise Section 10.3.4 to remove reference to issuing respirators.
28. Revise Section 11.1.1 to clarify announcements and remove mention of pagers.
29. Revise Section 11.2 to remove Yankee Public Affairs Representative and replace with ISFSI Shift Supervisor/ Incident Director or designee.
30. Revise Section 12.1.1 to add an annual Radiological Monitoring Drill.
31. Revise Section 12.1.1 to remove monthly pager tests with onsite emergency response organization.
32. Revise Annual medical drill to remove contamination as a drill complication.
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37. Revise Section 12.6 to remove the Emergency Plan Coordinator and assign all responsibilities to the ISFSI Operations Manager.
38. Revise Section 12.6 to remove the Quality Assurance Manager.
39. Revise Appendix A to remove Memorandum of Understanding with Vermont Yankee.
40. Revise Appendix B to remove the Alternate Emergency Response Facility Readiness Check Implementing Procedure.
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42. Delete Appendix C.
43. Typographic corrections, various locations.

10 CFR 50.54(q) specifically states that:

"The nuclear power reactor licensee may make changes to [their emergency plan] without Commission approval only if the change does not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of 50.47(b) and the requirements of Appendix E of this part."

Based on the justifications that follow, the proposed changes do not decrease the effectiveness of the Plan. NRC notification of the change will be required within 30 days after the change is made.

2.0 JUSTIFICATION FOR CONCLUSION

The changes are reviewed individually in Section 3.0 below and are each found to not decrease the effectiveness of the ISFSI Emergency Plan (IEP). There is no commonality between or among these changes, therefore, when reviewed collectively these changes do not reduce the effectiveness of the IEP. Specifically, the changes reflect the completed demolition of the facility resulting in a reduction in consequences. As a result, the IEP takes credit for these reductions while still ensuring adequate protective measures are in place to respond to the remaining consequences which may occur.

The ISFSI Emergency Plan continues to meet the guidance and intent of the standards and regulations applicable.

3.0 DISCUSSION OF PROPOSED CHANGES

Due to the large number of individual text changes being made, the changes have been grouped into the following subject areas of changes for ease of discussion.

.1 Normal facility organization: emergency response staffing levels; staff emergency activation and augmentation; assignment of staff emergency responsibilities.

This change reflects the implementation of the reduction in shift staffing and a reduction in routine operational staffing consistent with transition to an ISFSI in the post demolition phase of operation. Responsibilities for emergency response and classification are being centralized in the remaining staff positions. The ISFSI Shift Supervisor assumes all responsibilities for the support staff and augmented staff until a senior management person arrives and assumes command and control. The ISFSI Shift Supervisor is assisted in the performance of these duties by the available Security staff that performs notifications under the direction of the ISFSI Shift Supervisor acting as Incident Director.

With the staff reductions associated with the decommissioning of the facility, there are no longer individuals assigned to specific roles. The available staff personnel are crossed trained sufficiently to assist in the performance of any of the tasks associated with the implementation of the ISFSI Emergency Plan until augmented staffing arrive.

Additional responsibilities for approval and release of public information materials are added to the Incident Director's emergency responsibilities.

With the reduced staffing levels and the consolidation of responsibilities, there is no need to include the position descriptions in the ISFSI Emergency Plan. Also, with the reduced numbers of personnel on staff, and the extended time available to respond to

an event, there is no longer a need to maintain individual pagers to accomplish staff augmentation. Sufficient time is available for individual calls to be made to any personnel needed to augment the shift staff during an event.

.2 Assignment and staffing levels of on-shift emergency response staff; interface between on-site and off-site organizations; corporate site response.

Section 3.1 above discussed the reduced augmentation staff available. The changes related to the assignment of responsibilities to the ISFSI Shift Supervisor also affected the responsibility for interface with the local fire department in the event of a fire. This was a re-assignment of the responsibility only.

.3 Emergency Communications Systems and testing.

The deletion of the satellite phone testing discussion in Section 7.2 is to maintain consistency with the other communications systems testing. All testing is controlled and performed in accordance with site procedures at frequencies specified in site procedures.

.4 Emergency response facilities, equipment and supplies.

These changes altered the name of the "Alternate Emergency Response Facility" to "Incident Command Post", to indicate the intended use of the facility for security related event. The change also removed the pre-designation of the location for this facility (Furlon House) and allows for the Incident Director to select an appropriate location at the time of the incident.

The change to delete the discussion of "Pagers" is consistent with the staff reductions discussed above. With few personnel to notify and no response activities required beyond an Unusual Event or Alert level, there is adequate time available to notify augmentation personnel of the need to respond to an event should they be necessary.

The change to delete Table 6.1 "Emergency Equipment Inventory" allows for the relocation of this information to facility procedures and allows for the flexibility to modify the equipment and materials maintained at the site consistent with the level of activity.

With the elimination of a pre-designated Alternate Emergency Response Facility, there is no longer a need for the Alternate Emergency Response Facility Readiness Check Implementing Procedure.

.5 Protective actions and equipment for on-site emergency workers; evacuation and accountability for personnel on-site.

This change removes identification of specific locations for offsite assembly areas and allow for the designation of safe areas for personnel to assemble by the ISFSI Shift Supervisor/Incident Director.

.6 On-site emergency worker radiological exposure control measures and equipment; personnel decontamination equipment and supplies; first aid equipment and supplies.

This change deletes Table 6.1 "Emergency Equipment Inventory" from the ISFSI Emergency Plan and relocates the information to facility procedures and allows for the flexibility to modify the equipment and materials maintained at the site consistent with the level of activity. This change also eliminates the issuance of respirators, as there are no hazards requiring their use onsite any longer.

.7 Emergency Medical Treatment And Transportation Capabilities For On-Site Personnel.

This change removes the discussion of arrangements for helicopter transport capabilities being maintained by the facility. Helicopter transport capabilities are still available through local Emergency Medical Services providers.

.8 Training, drills, and exercise.

This change removes the annual simulated augmentation drill. With the small staff and removal of specialty training for specific positions and no augmentation time goal, there is no value added by the continued conduct of augmentation drills. The change also reassigns the frequency requirements for fire drills to the Fire Protection Program.

.9 Responsibilities for emergency plan review and update.

This change reflects the reduced staff at the facility and the consolidation of roles, responsibilities, authorities and accountabilities in fewer staff personnel by removing the Emergency Plan Coordinator and assign all responsibilities to the ISFSI Operations Manager and by reassigning the annual audit to the Yankee Audit Program.

This change added the Yankee Atomic Electric Company Integrated Response Plan on the list of supporting plans Appendix B. Additionally, removed the dates of all the Memorandum of Understandings and the Memorandum of Understanding with Vermont Yankee from Appendix A which was a reciprocating agreement for personnel.

4.0 STANDARDS AND REQUIREMENTS

The following identifies those changes that may impact current standards and regulations.

.1 Normal Facility Organization: Emergency Response Staffing Levels; Staff Emergency Activation And Augmentation; Assignment Of Staff Emergency Responsibilities

10CFR 50.47(b) (1) states:

“Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.”

The responsibilities for all required actions for the implementation of the ISFSI Emergency Plan have been clearly established and described. The staffing levels are consistent with the status of the facility and the re-assignment of responsibilities to the remaining on shift staff personnel is consistent with the reduced level of hazard presented by the facility. Also with the reduced level of hazard and the reduced staff of the facility, there is no specific need to assign specific response roles to individual positions.

This change maintains the assignment of responsibilities for emergency response and provides the staffing flexibility appropriate to the level of hazard presented by the facility and the staff available to respond.

This change does not reduce the effectiveness of the ISFSI Emergency Plan.

.2 Assignment And Staffing Levels Of On-Shift Emergency Response Staff; Interface Between On-Site And Off-Site Organizations; Corporate Site Response

10CFR 50.47(b) (2) states:

“On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.”

The responsibilities for all required actions for the implementation of the ISFSI Emergency Plan have been clearly established and described. The staffing levels are consistent with the status of the facility and the re-assignment of responsibilities to the remaining on shift staff personnel is consistent with the reduced level of hazard presented by the facility. Also with the reduced level of hazard and the reduced staff of

the facility, there is no specific need to assign specific response roles to individual positions.

This change maintains the assignment of responsibilities for emergency response and provides the staffing flexibility appropriate to the level of hazard presented by the facility and the staff available to respond.

This change does not reduce the effectiveness of the ISFSI Emergency Plan.

.3 Emergency Communications Systems and Testing

10CFR 50.47(b) (6) states:

“Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.”

The removal of the discussion of testing of Satellite phones from the IEP to the facility procedures for testing and maintenance of communications systems is consistent with the testing and maintenance of all communications systems used to implement the ISFSI Emergency Plan. The Satellite phone remains an available option for establishing communications with response organizations and for conducting notifications.

This change does not reduce the effectiveness of the ISFSI Emergency Plan.

.4 Emergency Response Facilities, Equipment And Supplies

10CFR 50.47(b) (8) states:

“Adequate emergency facilities and equipment to support the emergency response are provided and maintained.”

The revision of the Plan includes the elimination of the Furlon House as the Alternate Emergency Response Facility and allows the designation of an alternate onsite assembly area or Incident Command Post at the time of an emergency. This additional onsite assembly area capability and flexibility meets the intent of the above standard.

This change does not impact IEP compliance with current standards and regulations.

**.5 Protective Actions And Equipment For On-Site Emergency Workers;
Evacuation And Accountability For Personnel On-Site**

10CFR 50.47(b) (10) states:

“A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.”

This change does not reduce the range of protective actions available for the protection of onsite workers. It removes the pre-designated assembly area and allows the ISFSI Shift Supervisor/Incident Director to select the appropriate safe location for the conditions at hand.

This change does not impact IEP compliance with current standards and regulations.

**.6 On-Site Emergency Worker Radiological Exposure Control Measures And
Equipment; Personnel Decontamination Equipment And Supplies; First Aid
Equipment And Supplies**

10CFR 50.47(b) (11) states:

“Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.”

The removal of the listing of equipment and supplies to be maintained in emergency facilities from the IEP allows for the flexibility to maintain the appropriate level of equipment consistent with the level of hazard presented by the facility without the need for a plan change to adjust the inventory listing. The existing facility procedures provide adequate assurance that sufficient equipment and supplies are maintained in emergency facilities. The elimination of the issuance of respirators to emergency teams reflects the reduced hazard presented by the current facility configuration. There are no hazards that would require the use of respiratory protective equipment.

This change does not impact IEP compliance with current standards and regulations.

.7 Emergency Medical Treatment And Transportation Capabilities For On-Site Personnel.

10CFR 50.47(b) (12) states:

“Arrangements are made for medical services for contaminated injured individuals.”

The discussion of the helicopter services had previously been included to fully describe the resources available to local EMS providers. This resource is still available through local EMS providers. The standards and requirements do not specify the level of transport capability that must be provided. This determination is made by the facility and needs to be consistent with the training and qualifications of the facility staff. Site personnel are trained to the First Responder level only; the reference to a helicopter for emergency medical treatment was removed, as there is no space available on site for the helicopter to land. The patient would be transported offsite should a helicopter transport be needed. The local EMS provider will make this determination.

This change does not impact IEP compliance with current standards and regulations.

.8 Training, Drills, And Exercise

10CFR 50.47(b) (14) states:

“Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.”

With the limited potential for an emergency requiring emergency response activities at the facility, there is essentially no necessity for staff augmentation to respond to an event in any set timeframe. With all response responsibilities and authorities vested in the on shift staff or any augmentation staff specifically called to respond, the augmentation drill is not necessary to demonstrate this response capability.

The removal of the requirement to include a contaminated individual in each annual medical drill allows for more realistic scenarios for the facility. With the current configuration of the facility, there are essentially no contaminated areas for injuries to occur, which effectively eliminates any possibility for realistic scenarios. Retaining the annual medical drill allows for the ongoing interface training and practice that is appropriate for the facility condition and status.

This change does not impact IEP compliance with current standards and regulations.

.9 Responsibilities For Emergency Plan Review And Update

10CFR 50.47(b) (16) states:

“Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.”

This is essentially an editorial change in that the responsibilities for plan review and update have been re-assigned. Also, the removal of specific mention of the Quality Assurance Manager from the responsibility for the annual audit of the emergency preparedness program leaves this responsibility with the Yankee Quality Assurance Program and is essentially unchanged. The removal of the agreement dates from the plan is essentially an editorial change as the Agreements are reviewed and verified current annually in accordance with implementing procedures. The removal of the agreement with Vermont Yankee reflects the reduced staff available to support Vermont Yankee.

This change does not impact IEP compliance with current standards and regulations.

.10 Facility Description Changes

While not explicitly required by a specific regulatory citation, the various descriptive sections of the IEP place the provisions of the plan in proper context. These changes do not impact IEP compliance with current standards and regulations.