

ATTACHMENT 1

CONTROLLED COPY NO: 19
TO: USNRC Document Control Desk

DOCUMENT CHANGE NOTICE NO. 177

Date: 9/30/10

From: YNPS Administration Department

Document: IMPLEMENTING PROCEDURES TO THE ISFSI EMERGENCY PLAN

Instructions:

1. Enter the attached documents in your manuals and/or files, discard all obsolete copies, and return this form to the ISFSI Office Administrator at Yankee-Rowe within 30 calendar days.

2. SAFEGUARDS INFORMATION DOCUMENTS

ALL OBSOLETE copies shall be returned to the ISFSI Shift Supervisor (ISS) at Yankee Rowe for SHREDDING. SAFEGUARDS INFORMATION documents shall be hand-to-hand delivered or enclosed in two properly sealed and addressed envelopes. Return this form to the ISFSI Office Administrator.

DESCRIPTION OF CHANGE: ISSUANCE: Implementing Procedures to the ISFSI E-Plan

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DCN No. 177 9/30/10

Please inset the attached:

Table of Contents Rev. 177

AD-27, Rev. 3 "Emergency Planning Administration"

Thank you.

DOCKET NO. 50-29
LICENSE NO. DPR-3

Please sign and return this form to Karen Sucharzewski @ Yankee Rowe. Thank you.

The above documents have been entered in the applicable manual and/or files and all Obsolete copies have been discarded or identified as obsolete. SAFEGUARDS INFORMATION documents will be handled per #2 above.

Signature

Date

AY45
MRA

**YANKEE NUCLEAR POWER STATION
IMPLEMENTING PROCEDURES TO THE EMERGENCY PLAN
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**ATTACHMENT 2
YANKEE ATOMIC ELECTRIC COMPANY
ISFSI PROCEDURE**

**EMERGENCY PLANNING ADMINISTRATION
AD-27
Rev. 3**

Preparer: KEN KURONTICASK! Date: 9.5.10
(Include any additions, deletions, or changes to the Routine Activity Database)

ISFSI Routine Activity Database Assessment	
Affected Routine Activity Items	# 263, 264, 265, 269, 270 + 275
NA if no activities are affected by this procedure. Attach revised or marked up RAI sheets for review.	

10CFR50.59 / 10CFR72.48 ASSESSMENT		
10CFR50.59 SCREEN REQUIRED?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
10CFR50.59 EVALUATION REQUIRED (NO. _____)	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
10CFR72.48 SCREEN REQUIRED?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
10CFR72.48 EVALUATION REQUIRED (NO. _____)	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO

REVIEWER SECTION		
<input checked="" type="checkbox"/> QUALITY ASSURANCE REVIEW SIGNATURE	<i>[Signature]</i>	DATE: <u>9/28/10</u>
<input checked="" type="checkbox"/> RADIATION PROTECTION REVIEW SIGNATURE	<i>[Signature]</i>	DATE: <u>9/28/10</u>
<input checked="" type="checkbox"/> TECHNICAL REVIEW SIGNATURE	<i>Mark DeBay</i>	DATE: <u>9/8/10</u>
<input type="checkbox"/> INDEPENDENT SAFETY REVIEW SIGNATURE	<u>N/A</u>	DATE: _____

APPROVAL SECTION	
ISFSI MANAGER/DESIGNEE SIGNATURE/DATE:	<i>[Signature]</i> <u>9/30/2010</u>

EMERGENCY PLANNING ADMINISTRATION

1.0 PURPOSE

This procedure provides emergency planning policy, administrative guidance, descriptive material related to responsibilities associated with support of the Yankee Atomic Electric Company (YAEC) Emergency Plan for the Independent Spent Fuel Storage Installation (ISFSI). The process for E-Plan revision is also described.

2.0 DEFINITIONS

- 2.1 Drill - a supervised instruction period aimed at developing and maintaining skills and abilities.
- 2.2 Emergency Response Organization (ERO) – consists of on-shift personnel at the Yankee-Rowe ISFSI and other personnel who are called in as needed and respond to declared emergencies.
- 2.3 Exercise - an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organization.
- 2.4 Incident – the occurrence of a potentially serious event that requires timely assessment and an appropriate timely response. Based on the assessment, notification to state and NRC officials may be required, and a response by the Emergency Response Organization may be required.

3.0 REFERENCES

- 3.1 Yankee Atomic Electric Company Emergency Plan
- 3.2 Code of Federal Regulations, 10CFR50, Appendix E
- 3.3 Code of Federal Regulations, 10CFR50.47(b)(8)
- 3.4 Yankee Quality Assurance Program (QAP)
- 3.5 ISFSI Procedure AD-16, “ISFSI Personnel Training and Qualifications”
- 3.6 ISFSI Procedure AD-21, “Emergency Preparedness Drills and Exercises”
- 3.7 ISFSI Procedure OP-12, “ISFSI Emergency Plan Facility/Equipment”
- 3.8 Code of Federal Regulations 10CFR50.54(q)
- 3.9 Code of Federal Regulations 10CFR50.54(t)

- 3.10 RIS 2005-02, "NRC Regulatory Issue Summary 2005-02 Clarifying the Process for Making Emergency Plan Changes", dated February 14, 2005.

4.0 RESPONSIBILITIES

- 4.1 ISFSI Manager has the overall responsibility for the Emergency Plan maintenance and implementation.
- 4.2 ISFSI Shift Supervisor - perform the initial assessment of ISFSI site incidents. If the incident is determined to meet the criteria, Emergency Action Level (EAL) for entry into the Emergency Plan, then ISFSI procedure EO-01 shall be initiated.
- 4.3 Emergency Response Organization ERO staff shall be responsible for the following actions:
- 4.3.1 Meet the fitness for duty requirements if responding to the site.
- 4.3.2 Maintain unescorted access, radiation worker training, and all other required training and qualifications current.
- 4.3.3 Notify the cognizant Manager if declaring pregnancy in accordance with the Radiation Protection Program for a position evaluation.

5.0 NOTES, PRECAUTIONS AND LIMITATIONS

None

6.0 PROCEDURE

- 6.1 Emergency Plan program elements are reflected on Attachment 1, "Emergency Plan Program Requirements."
- 6.2 Implementation of the Emergency Plan in response to Unusual Events is in accordance with ISFSI Procedure EO-01, "Emergency Plan Implementation."
- 6.3 Inspection, inventory and functional checks as applicable to the emergency equipment shall be performed in accordance with ISFSI Procedure OP-12, "ISFSI Emergency Plan Facility/Equipment."
- 6.4 Training of ERO personnel shall be in accordance with ISFSI Procedures AD-16, "ISFSI Personnel Training and Qualification."
- 6.5 Drills and Exercises shall be developed, conducted and evaluated in accordance with ISFSI Procedure AD-21, "Emergency Preparedness Drills and Exercises."

Emergency Plan Changes shall be conducted and approved in accordance with Attachment 2, "Emergency Plan 10CFR50.54(q) Review" which outlines the process for revising the YAEC Emergency Plan to comply with the requirements of 10 CFR 50.54(q) and the Quality Assurance Program (QAP).

7.0 SUMMARY OF CHANGES

- 7.1 Procedure was revised to incorporate findings as a result of ISFSI Audit Y-10-A04-01.
- 7.2 Minor editorial and formatting changes throughout.

8.0 ATTACHMENTS

- 8.1 Attachment 1 - Emergency Plan Program Requirements
- 8.2 Attachment 2 - Emergency Plan 10CFR50.54(q) Review

ATTACHMENT 1
EMERGENCY PLAN PROGRAM REQUIREMENTS
Sheet 1 of 5

“ORGANIZATION AND ADMINISTRATION”

ACTIVITIES	FREQUENCY	EXECUTING DOCUMENT
1. Identification of management and company authority for all emergency preparedness functions.	N/A	Emergency Plan
2. Maintenance of qualified individuals for each Emergency Response Organization (ERO) roster in SP-07 “Communications”.	Annually	SP-07
3. Maintenance of capability to account for all individuals on-site at the time of an emergency and ascertain the names of missing individuals.	N/A	EO-01
4. Maintenance of means to track and correct identified Emergency Preparedness Program deficiencies.	After Drills/exercise and audits	AD-07
5. Performance of Audit/review of the Emergency Preparedness Program.	Annually	Emergency Plan
6. Review Letters of Agreement	Annually	AD-21
7. Review EALs with the State and local governmental authorities.	Annually	AD-27

ATTACHMENT 1
EMERGENCY PLAN PROGRAM REQUIREMENTS
Sheet 2 of 5

“PLANS AND PROCEDURES”

ACTIVITIES	FREQUENCY	EXECUTING DOCUMENT
1. Review and update the Emergency Plan	Annually	AD-27
2. Review and revise the Emergency Plan implementing procedures and revise as-needed to incorporate changes resulting from reviews, drills and exercises, or changes to facilities or the environment.	Biennially (or as needed)	AD-04
3. Verify accuracy of names, titles, and phone numbers in SP-07 “Communications“ Att’s 6 & 7.	Quarterly	SP-07
4. Develop emergency response exercise scenarios.	Every 2 years	AD-21
5. Perform periodic (12 month) independent review or audit (QA) of the Yankee Emergency Plan.	Annually	Emergency Plan

ATTACHMENT 1
EMERGENCY PLAN PROGRAM REQUIREMENTS
Sheet 3 of 5

“TRAINING”

ACTIVITIES	FREQUENCY	EXECUTING DOCUMENTS
1. Develop and maintain Emergency Plan lesson plans.	Biennially (or as needed)	AD-16
2. Ensure training or retraining is completed for Emergency Response Organization (ERO) members.	Once per calendar year	AD-16
3. Maintain ERO personnel training records.	Annually	AD-16
4. Offer annual training to local support organizations (fire department, police department, ambulance service).	Annually	AD-16

ATTACHMENT 1
EMERGENCY PLAN PROGRAM REQUIREMENTS
Sheet 4 of 5

“FACILITIES, EQUIPMENT, AND RESOURCES”

ACTIVITIES	FREQUENCY	EXECUTING DOCUMENTS
1. Maintain, revise, and repair (as necessary) on-site facilities (ERF) and equipment in a ready status.	Quarterly (or immediately after each drill/exercise or actual event)	OP-12
2. Maintain agreements for: <ul style="list-style-type: none"> a. The transportation of contaminated injured individuals from the site to specifically identified off-site treatment facilities. b. Treatment of contaminated injured individuals at off-site treatment facilities. 	Annually	Letters of Agreement
3. Maintain and test communications from the on-site facilities to outside emergency response organizations.	Monthly	OP-12

ATTACHMENT 1
EMERGENCY PLAN PROGRAM REQUIREMENTS
Sheet 5 of 5

“EXERCISES AND DRILLS”

ACTIVITIES	FREQUENCY	EXECUTING DOCUMENT
1. Conduct emergency preparedness exercises and drills. <ul style="list-style-type: none"> a. Radiation Protection Drill b. Fire Drills (Training) c. Communication Tests d. Medical Drill e. E-Plan Exercise 	Annually Annually Monthly/quarterly Annually Every other year	AD-21 FP-01 OP-12 AD-21 AD-21
2. Provide formal critiques which identify weaknesses or deficient areas that need correction.	After each drill/exercise	AD-21

ATTACHMENT 2
EMERGENCY PLAN 10CFR50.54(q) REVIEW
Sheet 1 of 5

This attachment outlines the process for revising the YAEC Emergency Plan to comply with the requirements of 10 CFR 50.54(q) and the Yankee Quality Assurance Program (QAP).

Section I: Guidance

NOTE

A decrease in effectiveness in the plan is determined to have occurred if there has been a change or reduction in a commitment without a commensurate change or reduction in the bases for that commitment. For this purpose a commitment is defined as a statement made in the Emergency Plan that affects the capability or resources (e.g., personnel, equipment) for responding to an emergency

1. Complete the "Emergency Plan Change Evaluation, Review, and Approval Form" including the 10CFR50.54(q) "Decrease in Effectiveness Review
2. Combine the "Emergency Plan Change Evaluation, Review, and Approval Form" including the 10CFR50.54(q) review, and the associated E-Plan changes and forward the entire package to the ISFSI Manager for Independent Safety Review (ISR).

NOTES

1. The determination that the change will not decrease the effectiveness of the E-Plan is documented on "Emergency Plan Change Evaluation, Review, and Approval Form" and its supporting 10CFR50.54(q) "Decrease in Effectiveness Review."
2. If the change is determined to decrease the effectiveness of the E-Plan, the proposed change shall be submitted as specified by 10CFR50.4 for approval by the NRC prior to its implementation.
3. If the change represents an alternative method for meeting regulations (to those given in the Regulatory Position of the Regulatory Guide 1.101 Rev.4) the change shall be submitted as specified by 10 CFR 50.4 for approval by the NRC prior to implementation. [3.10]

ATTACHMENT 2
EMERGENCY PLAN 10CFR50.54(q) REVIEW
Sheet 2 of 5

3. Following an Independent Safety Review, the ISFSI Manager (or designee) will review the package to determine if the proposed change decreases the effectiveness of the ISFSI Emergency Plan and approve the changes by signature on "Emergency Plan Change Evaluation, Review, and Approval Form."
4. The documentation package will be provided to the ISFSI Office Administrator for filing and issuance.
5. The ISFSI Office Administrator shall forward a copy of the "Emergency Plan Change Evaluation, Review, and Approval Form" and any supporting documentation to Licensing for subsequent transmittal to NRC within 30 days of the effective date of the change in accordance with the requirements of 10 CFR 50.54 (q).

ATTACHMENT 2
EMERGENCY PLAN 10CFR50.54(q) REVIEW

Sheet 3 of 5

EMERGENCY PLAN CHANGE EVALUATION, REVIEW & APPROVAL FORM

Change Number in Progress: _____

Originator: _____ Date: _____

Summary Description of Change: _____

Determination of E-Plan Effectiveness Reduction:

This proposed change affects the following subject areas of the Emergency Plan: (check each topic applicable)

- Normal facility organization: emergency response staffing levels; staff emergency activation and augmentation; assignment of staff emergency responsibilities.
- Assignment and staffing levels of on-shift emergency response staff; interface between on-site and off-site organizations; corporate site response.
- Arrangements for using off-site assistance organizations; assistance expected from off-site authorities.
- Emergency Classification System, including supporting emergency action levels.
- Initial and follow-up notification of state authorities.
- Emergency Communications Systems and testing.
- Emergency response facilities, equipment and supplies.
- Methods, systems, and equipment for assessing off-site radiological projections.
- Protective actions and equipment for on-site emergency workers; evacuation and accountability for personnel on-site.

ATTACHMENT 2
EMERGENCY PLAN 10CFR50.54(q) REVIEW

Sheet 4 of 5

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

- Emergency medical treatment and transportation capabilities for on-site personnel.

- Training, drills, and exercise.

- Responsibilities for emergency plan review and update.

For each of the above subject areas checked as affected, attach written justification in the form of a 10CFR50.54(q) "Decrease in Effectiveness Review" that this proposed change does not reduce the effectiveness of the Emergency Plan. In addition to ensuring that the requirements of 10 CFR 50.47(b) and Appendix E continue to be met, the "Decrease in Effectiveness Review" should include consideration of: [3.10]

- The impact the change has on the capability to perform the associated function (i.e., is the function degraded or lost),
and
- The impact the change has on the time requirements of all affected Emergency Plan requirements (i.e., has the time requirement been relaxed or lost).

NOTE

If the proposed change is determined to decrease the effectiveness of the Emergency Plan, the proposed change shall be submitted as specified by 10CFR50.4 for NRC approval prior to its implementation.

Conclusions: The proposed change will / will not decrease the effectiveness of the Emergency Plan.

The proposed change does / does not represent an alternative method to those provided in Regulatory Guide 1.101, Rev.4, for meeting Emergency Plan requirements. [3.10]

ATTACHMENT 2
EMERGENCY PLAN 10CFR50.54(q) REVIEW
Sheet 5 of 5

Completed by: _____ Date _____

Independent Safety Review: _____ Date _____

Approved: _____ Date _____
ISFSI Manager (or Designee)

Issued: _____ Date _____
Administration

NOTE

Administration shall forward a copy of this form and any supporting documentation to Licensing for subsequent transmittal to NRC within 30 days of the effective date of the change in accordance with the requirements of 10CFR50.54(q).