

August 6, 2014

Vanessa Quinn, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
Federal Emergency Management Agency
1800 South Bell Street
Arlington, VA 20598-3025

SUBJECT: VERMONT YANKEE PRE-EXEMPTION EMERGENCY PLAN – REQUEST FROM
ENTERGY NUCLEAR OPERATIONS, INC. FOR APPROVAL TO ELIMINATE
CERTAIN EMERGENCY RESPONSE ORGANIZATION POSITIONS

Dear Ms. Quinn:

By letter dated March 24, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14085A257), Entergy Nuclear Operations, Inc. (ENO) requested a license amendment to the Site Emergency Plan (SEP) for the Vermont Yankee Nuclear Power Station (VY), to be implemented upon the permanent cessation of reactor operation and transfer of spent fuel out of the reactor vessel. The proposed changes to the licensee's on-shift and emergency response organization (ERO) staffing are based on the permanent defueled condition of the site and are commensurate with the reduced spectrum of credible accidents. However, since these proposed changes would be implemented prior to the U.S. Nuclear Regulatory Commission (NRC) granting any exemption to the requirements of Part 50 to Title 10 of the *Code of Federal Regulations* (10 CFR), formal offsite radiological emergency preparedness (REP) plans, as required under 44 CFR 350, would still be required at the time the proposed license amendment is implemented by the licensee. As such, the Federal Emergency Management Agency (FEMA) is requested to review the specific changes outlined below to the licensee's ERO and provide the NRC an evaluation of whether these changes would preclude offsite agencies from implementing their approved emergency plans.

ENO's proposed changes, including those related to ERO staffing of the licensee's emergency operations facility (EOF) and joint information center (JIC) are addressed in Attachment 1 to ENO's March 24, 2014 letter, Section 5.2, "Analysis of Proposed Changes – ERO Staffing," which states:

There are two positions being eliminated that had tasks that involved interfacing with State and local officials the EOF Manager and the JIC Logistics Coordinator. The EOF Manager briefed these officials when they arrived at the EOF. This is a duplicate effort with the Lead Offsite Liaison (which is not being eliminated). Therefore, there will be no impact on the existing interface with the elimination of the EOF Manager. The JIC Logistics Coordinator was responsible for copying and distribution of press releases in the JIC to State and local officials. This task is going to be assumed by the JIC Manager. Therefore, the elimination of the JIC Logistics Coordinator will not impact the ability to maintain the interface with State and local officials.

Our initial review of the ENO submittal for requesting EOF staff reductions indicated that none of the following key positions supporting offsite response organizations (OROs) are to be eliminated: emergency director, technical advisor, radiological assessment coordinator (to include a dose assessor and offsite monitoring teams), lead offsite liaison, offsite liaisons, and offsite communicator. The briefing of ORO officials arriving at the EOF will be the responsibility of the lead offsite liaison (as noted above), which was previously a duplicate task assigned to the EOF manager.

In regard to the JIC, the following remaining positions: company spokesperson, JIC manager, and technical advisor (along with an inquiry responder), should provide adequate interface with ORO public information counterparts. Copying and distribution of press releases to ORO officials at the JIC will now be the responsibility of the JIC manager (previously the JIC logistics coordinator).

To facilitate our review, the NRC requested ENO to clarify that the affected State and local response organizations had independently performed a review of their applicable plan and concurred with ENO's determination that proposed licensee staffing changes had no adverse impact on ORO's ability to effectively implement their FEMA-approved REP plans, specifically in regard to interface and coordination with the licensee. In response, ENO provided e-mails with the States of Vermont, New Hampshire, and Massachusetts (Enclosures 1-3). Key REP officials from each of the States have confirmed they have not identified any interface or coordination impediments as a result of the elimination of designated positions in the EOF and JIC.

It is our understanding that on June 26, 2014, ENO provided a briefing to the FEMA Region I REP staff, which included a specific discussion regarding the above-referenced proposed ERO changes (ADAMS Accession No. ML14204A344). We have also been informed by ENO that drills will be conducted in the 4th quarter of 2014 to confirm the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility and will utilize the post-shutdown procedures currently being developed depicting the revised assignment of duties. Per the Memorandum of Understanding between FEMA and the NRC, contained in Section III.B (FEMA Review of Offsite Plans and Preparedness) to Appendix A to 44 CFR Part 353, I am requesting FEMA's review and concurrence of the proposed ENO ERO changes described above to the VY SEP. Based on the licensee's intent to conduct drills utilizing the proposed post-shutdown ERO in the 4th quarter 2014, I am requesting that FEMA provide their assessment by no later than August 29, 2014. Please contact me if FEMA is unable to meet this due date.

As always, thank you for your assistance. If you have any questions regarding the specifics of the changes requested to the VY SEP or the NRC's evaluation of these proposed changes, please contact Richard Kinard at (301) 287-3768.

Sincerely,

/RA/

Joseph D. Anderson, Chief
Operating Reactor Licensing and Outreach Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

Enclosures:

1. New Hampshire–Post
Shutdown ERO Changes
2. Vermont–Post Shutdown
ERO Changes
3. Massachusetts–Post
Shutdown ERO Changes

cc: A. Coons, FEMA HQ

V. Quinn

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V. Quinn, FEMA HQ

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