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Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving No Significant Hazards Considerations

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Submitter Information

Name: Anthony Leshinskie
Address:
State of Vermont, Public Service Department
112 State Street
Montpelier, VT, 05620-2601
Email: Anthony.Leshinskie@state.vt.us

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General Comment

See attached PDF for comments.

Attachments

ENVY BVY 14-018 Public Period Comments PSD-ARL to NRC

SUNSI Review Complete
Template = ADM – 013
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Add= M. Henderson (MAH4)
D. Broaddus (DAB)

VERMONT

State of Vermont
Department of Public Service
112 State Street
Drawer 20
Montpelier, VT 05620-2601
http://www.publicservice.vermont.gov

[phone] 802-828-2811
[fax] 802-828-2342
[tty] 800-734-8390

August 21, 2014

Docket ID NRC-2014-0169
Comments from the Vermont Public Service Department regarding the following License Amendment Request published in the Federal Register on July 22, 2014:

> ENTERGY NUCLEAR VERMONT YANKEE, LLC & ENTERGY NUCLEAR OPERATIONS, INC., DOCKET NO. 50-271, VERMONT YANKEE NUCLEAR POWER STATION, VERNON, VT.
>
> *Date of amendment request:* March 24, 2014. A publicly available version is in ADAMS under Accession No. ML14085A257.
>
> *Description of amendment request:* The proposed amendment would revise the site emergency plan for the permanently defueled condition to reflect changes in the on-shift staffing and Emergency Response Organization staffing.

Gentlemen:

The subject Vermont Yankee License Amendment Request (LAR) has been reviewed by the State Nuclear Engineer and Decommissioning Coordinator on behalf of the State of Vermont and its Public Service Department. Comments from this review are summarized in the table included in this letter and are respectfully submitted for Nuclear Regulatory Commission consideration as it examines the merits of this LAR as part of the Safety Evaluation Report process for Vermont Yankee.

Please note that this review of the LAR was made with regard only to the interactions of the Public Service Department with Vermont Yankee On-Shift and Emergency Response Organization staff during an Emergency Response Condition. It is likely that other State of Vermont Agencies (e.g. the Division of Emergency Management and Homeland Security or the Department of Health) that also interact with the Vermont Yankee On-Shift and Emergency Response Organization staff will provide their own comments on this LAR.

The Public Service Department comments on the LAR (ADAMS Accession No. ML14085A257) are as follows:

Comment #	Attachment #	Section # / Description	Comment
1	1	5.2.4.2	In justifying elimination of the Technical Support Center (TSC) Reactor Engineer position, the first Analysis paragraph implies that the Reactor Engineer's function can be performed by the Shift Technical Advisor (STA). The STA position is also being eliminated (per Section 5.2.4.1). Eliminating the Reactor Engineer position should not rely on another ERO or On-Shift Staffing position that is also being eliminated. Provide an alternate justification or reinstate the TSC Reactor Engineer position.
2	1	1	The discussion that identifies the post-shutdown on-shift staff positions describes a total of 6 positions. Subsequent discussion in Sections I & II of Attachment 4 (&Figure 8.1 of Attachment 3) indicates that the minimum post-shutdown number of staff is 7 or 8, depending upon whether 1 of 2 Fire Brigade positions is assigned to Radiation Protection Technician. Attachment 1 makes no mention of the 2 required Fire Brigade positions in its on-shift staff summary. To avoid confusion on the minimum staff requirements, either mention these positions in the Attachment 1 summary or at least note that additional minimum required positions are discussed in Attachments 3 & 4. (This comment also applies to Attachment 2, Pages 4 & 6 text and Attachment 3, Section 8.1 text.)
3	2	Table 8.4 – Page 2 of 2 text	Do the 2 Fire Brigade positions noted in Comment #2 need to be noted here?
4	4	Sections IV.C.1 & VI	While the Station Blackout (SBO) rule clearly applies to operating power reactors, a brief statement indicating that the Control Room and Spent Fuel Pool-related systems at the permanently shut down Vermont Yankee station will have a means to receive electric power in the event of a loss of offsite electric power is still necessary. This statement should indicate what on-site systems will remain available to supply this back-up power source (e.g. the SBO Diesel Generator). Alternatively, indicate what subsequent documentation will discuss back-up power sources.
5	4	Sections IV.C.2 & VI	While I concur that the described Control Room fire is the limiting scenario for this type of design basis accident, some discussion is necessary to demonstrate that fire protection remains in place for the entire Vermont Yankee site to assure that the Spent Fuel Pool and its associated support systems are not compromised in the event of a fire anywhere on-site. Alternatively, indicate what subsequent documentation will discuss on-site fire protection.

Comment #	Attachment #	Section # / Description	Comment
6	4	II.C.9 & Subsequent E-Plan Tables	The Time Motion Studies (TMS) included in this Attachment assume that Vermont Yankee's Emergency Response Data System (ERDS) link to the NRC will not be operational in the permanently shut down and defueled condition. ERDS is specifically identified in Vermont's Radiological Emergency Response Plan (RERP) as the means for the Public Service Coordinator, located at the State Emergency Operations Center (SEOC) during an emergency response condition, to assess Vermont Yankee conditions as part of Vermont's protective action decision-making process. While it is recognized that many of the ERDS parameters (e.g. those related to the Reactor Coolant System and Safety Injection) are meaningless once Vermont Yankee is in a permanently shut down and defueled condition, the ERDS Radiation Monitoring System, Meteorological Data and Containment parameters related to the Spent Fuel Pool will still provide meaningful information. As a result, the State of Vermont requires that either 1) the ERDS link to the NRC be retained during Vermont Yankee's permanently shut down and defueled period or 2) an alternate means similar to ERDS is made available to provide equivalent Radiation Monitoring System, Meteorological information and Containment parameters relevant to the Spent Fuel Pool conditions for as long as fuel remains within the Spent Fuel Pool.

NRC or Vermont Yankee questions regarding these comments may be directed to the Vermont State Nuclear Engineer and Decommissioning Coordinator via the contact information included with the electronic signature below.

Regards,

/s/ Anthony R. Leshinskie

Anthony R. Leshinskie
State Nuclear Engineer & Decommissioning Coordinator
State of Vermont
Public Service Department
112 State Street
Montpelier, VT 05620-2601
Anthony.Leshinskie@state.vt.us