



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 4, 2015

Vice President, Operations
Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
P.O. Box 250
Governor Hunt Road
Vernon, VT 05354

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION - ISSUANCE OF
AMENDMENT TO RENEWED FACILITY OPERATING LICENSE
RE: CHANGES TO THE EMERGENCY PLAN (TAC NO. MF3668)

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 261 to Renewed Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station, in response to your application dated March 24, 2014, as supplemented by letters dated May 21, 2014, and August 14, 2014.

The amendment revises the site emergency plan for the permanently defueled condition to reflect changes in the on-shift staffing and Emergency Response Organization staffing.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in cursive script that reads "James Kim".

James Kim, Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures:

1. Amendment No. 261 to DPR-28
2. Safety Evaluation

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ENTERGY NUCLEAR VERMONT YANKEE, LLC

AND ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-271

VERMONT YANKEE NUCLEAR POWER STATION

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 261
Renewed License No. DPR-28

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Vermont Yankee Nuclear Power Station (the facility) Renewed Facility Operating License No. DPR-28 filed by Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (the licensee) dated March 24, 2014, as supplemented by letters dated May 21, 2014, and August 14, 2014, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, by Amendment No. 261, Renewed Facility Operating License No. DPR-28 is hereby amended to authorize the revision to the Vermont Yankee Nuclear Power Station Site Emergency Plan as set forth in the Entergy Nuclear Operations, Inc. application dated March 24, 2014, as supplemented by letters dated May 21, 2014, and August 14, 2014, and as evaluated in the NRC staff's safety evaluation dated February 4, 2015.
3. The license amendment is effective as of the date of issuance, and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read 'W. M. Dean', written in a cursive style.

William M. Dean, Director
Office of Nuclear Reactor Regulation

Date of Issuance: February 4, 2015



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 261

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-28

ENTERGY NUCLEAR VERMONT YANKEE, LLC

AND ENTERGY NUCLEAR OPERATIONS, INC.

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

1.0 INTRODUCTION

By letter dated September 23, 2013 (Reference 1), Entergy Nuclear Operations, Inc. (ENO, the licensee) informed the U.S. Nuclear Regulatory Commission (NRC, the Commission) that the Vermont Yankee Nuclear Power Station (VY, the facility) will permanently cease operations at the end of the current operating cycle, which is expected to occur in the fourth quarter of Calendar Year 2014. Upon docketing of the certifications for permanent cessation of operations (paragraph 82(a)(1)(i) to Part 50, "Domestic Licensing of Production and Utilization Facilities," of Title 10 of the *Code of Federal Regulations* (10 CFR)) and permanent removal of fuel from the reactor vessel (10 CFR 50.82(a)(1)(ii)), pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for VY will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel. The irradiated fuel will be stored in the spent fuel pool (SFP) and in the independent spent fuel storage installation until it is shipped off-site in accordance with the schedules as described in the licensee's Post-Shutdown Decommissioning Activities Report (Agencywide Documents and Management System (ADAMS) Accession No. ML14357A110) and updated Irradiated Fuel Management Plan (ADAMS Accession No. ML14358A251), which were both submitted on December 19, 2014.

By application dated March 24, 2014 (Reference 2), as supplemented by letters dated May 21, 2014 (Reference 3), and August 14, 2014 (Reference 4), ENO requested approval by the NRC for proposed changes to the VY Site Emergency Plan (SEP), prior to implementation by the licensee, to support the planned permanent cessation of operations and permanent defueling of the VY reactor. The proposed changes would revise the VY SEP on-shift and emergency response organization (ERO) staffing commensurate with the reduced spectrum of credible accidents for a permanently shutdown and defueled power reactor facility.

The proposed changes would revise the VY SEP Table 8.4, "Minimum Staffing Requirements for the EN[Entergy]VY [ENVY] ERO," to eliminate seven (7) on-shift positions from current staffing levels, which include the following on-shift positions: two (2) Control Room Operators (CROs);

three (3) Auxiliary Operators (AOs); Shift Technical Advisor (STA); and Chemistry Technician. Also, the following augmented positions are proposed to be eliminated from the licensee's ERO:

Technical Support Center (TSC)

- TSC Manager
- TSC Reactor Engineer
- Manpower and Planning Liaison
- TSC Communicator
- TSC Engineers
- Information Technology (IT) Specialist

Operations Support Center (OSC)

- Operations Support
- Instrumentation & Controls (I&C)/Electrical Coordinator
- Mechanical Coordinator
- Radiological/Chemistry Coordinator
- Work Control Coordinator
- OSC Log Keeper

Emergency Operations Facility (EOF)

- EOF Manager
- EOF Communicator
- Public Information Liaison
- Emergency Planning Coordinator
- IT Specialist
- EOF Log Keeper

Joint Information Center (JIC)

- Information Coordinator
- Press Release Writer
- Logistics Coordinator
- Technical Assistant
- JIC Log Keeper
- Inquiry Response Coordinator
- Media Monitor/Status Phone Recorder
- Credentialing

The supplemental letters dated May 21, 2014 (Reference 3), and August 14, 2014 (Reference 4), provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the original proposed no significant hazards consideration determination as published in the *Federal Register* (FR) on July 22, 2014 (79 FR 42546).

2.0 REGULATORY EVALUATION

The regulatory requirements and guidance on which the NRC staff based its review of the license amendment request are addressed below.

2.1 Regulatory Requirements

In 10 CFR 50.47(b)(1) it states, in part, that: "...each principal response organization has staff to respond and to augment its initial response on a continuous basis."

In 10 CFR 50.47(b)(2) it states, in part, that: "...adequate staffing to provide initial facility accident response in key functional areas is maintained at all times," and that "timely augmentation of response capabilities is available...."

In 10 CFR Part 50, Appendix E, Section IV, Part A, "Organization," it states, in part, that: "The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization...."

2.2 Guidance

Regulatory Guide 1.101 (RG 1.101), Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors" (Reference 5), provides guidance on methods acceptable to the NRC staff for implementing specific parts of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. Revision 2 of RG 1.101 endorses Revision 1 to NUREG-0654/FEMA (Federal Emergency Management Agency)-REP (Radiological Emergency Preparedness)-1 (NUREG-0654), "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (Reference 6), which provides specific acceptance criteria for complying with the standards set forth in 10 CFR 50.47. These criteria provide a basis for NRC licensees, and State and local governments to develop acceptable radiological emergency plans and preparedness.

In NUREG-0654, Section II, "Planning Standards and Evaluation Criterion," Evaluation Criteria II.B.1 and II.B.5 address the 10 CFR 50.47(b)(2) planning standard. Evaluation Criterion II.B.1 specifies the on-site emergency organization of plant staff personnel for all shifts, and its relation to the responsibilities and duties of the normal shift complement. Evaluation Criterion II.B.5, states, in part, that:

Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both on-site and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.

The Nuclear Energy Institute (NEI) document NEI 10-05, Revision 0, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities" (Reference 7), was developed to establish a standard methodology for licensees to perform analyses of the ability of on-shift staff to perform all required functions and tasks necessary to respond to a declared emergency. Licensees are able to use this methodology as an acceptable method to meet the requirement of 10 CFR Part 50, Appendix E, Section IV.A.9.

3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of its proposed emergency plan changes, as described in the licensee's letter dated March 24, 2014 (Reference 2), and as supplemented by letters dated May 21, 2014 (Reference 3) and August 14, 2014 (Reference 4). The staff reviewed the request using the evaluation criteria in Table B-1 of NUREG-0654. The staff's technical evaluation for each major functional area of Table B-1 is detailed in Sections 3.1 through 3.6 of this safety evaluation.

The licensee states in its letter dated March 24, 2014 (Reference 2), that

To support reduced staffing following permanent cessation of operations and permanent removal of fuel from the reactor vessel, the proposed post-shutdown on-shift staffing was evaluated in conjunction with the postulated accidents previously submitted to the NRC using NEI 10-05 methodology...."

The licensee also states that the post-shutdown on-shift staffing assessment (OSA) analyzed the following accident scenarios:

- design basis security threat,
- fuel handling accident,
- aircraft potential threat,
- fire requiring evacuation of the Control Room and control of the service water pumps from a remote location, and
- general emergency declaration with a radioactive release and a protective action recommendation.

The spectrum of credible accidents and operational events for a permanently shutdown and defueled reactor, and the number and complexity of activities required for the safe storage of spent nuclear fuel is reduced, as compared to an operating plant. The primary events of concern in the immediate post-shutdown and defueled condition will be a fuel handling accident and a loss of SFP cooling and/or water inventory.

The licensee states in its August 14, 2014, letter (Reference 4) that:

During fuel handling activities there will be extra personnel on site that will, were a fuel handling accident to occur, be able to respond to the event. Events involving a loss of SFP cooling and/or water inventory can be addressed by implementation of SFP inventory makeup strategies [plant procedures to restore SFP cooling and/or implementation of SFP inventory makeup strategies] required under 10 CFR 50.54(hh)(2).

The licensee also states that these strategies will continue to be required in license condition 3.N, "Mitigation Strategy License Condition."

3.1 Major Functional Area: Plant Operations and Assessment of Operational Aspects

The guidance for licensee minimum staffing for nuclear power plants regulated by the NRC is documented in NUREG-0654, Table B-1 (Reference 6). The total minimum on-shift staffing expressed in NUREG-0654, Table B-1 is ten (10) personnel. Plant operations shift staffing, as implemented previously, was based on a philosophy that provided defense-in-depth for an operating nuclear power plant. Because of the reduced number of possible events requiring mitigating actions and the limited number of actions to be performed by the Control Room positions for a permanently shutdown and defueled condition, the licensee noted no CRO or STA job tasks as being required for any of the events analyzed in the post-shutdown OSA. The post-shutdown OSA performed by the licensee can inform the basis for the proposed changes to the on-shift staffing.

The VY SEP currently identifies the following on-shift staffing:

- one (1) Shift Manager,
- one (1) Control Room Supervisor (CRS),
- two (2) CROs,
- six (6) AOs,
- one (1) Radiation Protection (RP) Technician,
- one (1) Chemistry Technician, and
- one (1) STA.

The post-shutdown OSA concluded that in a permanently shutdown and defueled condition, with the postulated accidents that would be applicable to that condition, the following on-shift complement would be able to perform all required SEP actions in a timely manner and that there are no identified collateral duties that would prevent the timely performance of emergency plan functions:

- one (1) Shift Manager,
- one (1) CRS/Certified Fuel Handler (CFH),
- one (1) RP Technician, and
- three (3) CROs/AOs/Non-Certified Operators (NCOs).

The licensee states, in its March 24, 2014 letter (Reference 2), that:

...the [on-shift] CRO and STA positions can be eliminated without reducing the effectiveness of the post-shutdown SEP.

The licensee also states, in its August 14, 2014 letter (Reference 4), that:

The NCO position combines the post-shutdown duties of the licensed Reactor Operator (RO) and the non-licensed Auxiliary Operator (AO).

The licensee concluded that, although the number of on-shift staff at VY following permanent defueling will be reduced from current normal operating levels, the proposed VY staffing levels will be commensurate with the need to safely store spent fuel at the facility in a manner that is protective of the public health and safety.

The NRC requires that the licensee's emergency plan (EP) be at a level of effectiveness commensurate with the potential consequences to public health and safety and common defense and security at the licensee's site. With the permanent cessation of operations and the permanent removal of the fuel from the reactor vessel at VY, most of the accident scenarios postulated for an operating power reactor are no longer possible. The irradiated fuel is now stored in the SFP and will remain on-site until it can be moved off-site for long-term storage or disposal. The reactor, reactor coolant system (RCS), and reactor support systems are no longer in operation and have no function related to the storage of the irradiated fuel. Therefore, postulated accidents involving a failure or malfunction of the reactor, RCS, or reactor support systems are no longer applicable. During reactor decommissioning, the principal public safety concerns involve the perceived radiological risks associated with the storage of spent fuel on-site. The proposed level of on-site operations staff will continue to provide for communication and coordination capabilities with off-site organizations, for the level of support required for the remaining design basis accidents (DBAs) and the prompt implementation of mitigative actions in response to an SFP accident.

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed level of the on-shift staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.2 Major Functional Area: Notification/Communication

The regulations in Section IV.D.3 of Appendix E to 10 CFR Part 50 require that the licensee have the capability to notify responsible State and local government agencies within 15 minutes after declaration of an emergency. The regulations in 10 CFR 50.72(a)(3) require that the licensee notify the NRC immediately after notification of the appropriate State or local agencies and not later than 60 minutes after the time the licensee declares one of the emergency classes.

The licensee uses the InForm Notification System located in the Control Room and the EOF. The InForm system consists of source and destination computers that take advantage of the internet to send Emergency Notification Forms to the States of Vermont, New Hampshire, and Massachusetts during a declared emergency. This system is staffed on a 24-hour basis at the Control Room and the State Police dispatching points. The activation of the public notification system starts with this 24-hour State Police link. The InForm system performs self-checks every 10 seconds.

The licensee also uses the Nuclear Alert System (NAS), which originates in the Control Room as a backup system. The NAS is a system of dedicated phone circuits independent of the normal land-line phone system. The NAS is used to notify the State Police of Vermont, Massachusetts, and New Hampshire of any emergency. The VY SEP describes this system as a secure (dedicated) communications arrangement that is installed for the primary purpose of initial

notification of the States, via State Police. The NAS also links the Control Room, the Emergency Operating Centers and Incident Field Offices of Massachusetts, New Hampshire, and Vermont, and the EOF/Recovery Center (RC). This communication system incorporates all of the principal emergency response centers into a single dedicated network.

The licensee states, in its letter of March 24, 2014 (Reference 2), that:

For purposes of the OSA, the NRC notifications were treated as a continuous action in accordance with 10 CFR 50.72(c)(3), meaning that once the initial NRC communications are established, it was assumed that the NRC will request an open line to be continuously maintained with the NRC Operations Center. The use of dedicated phone circuits and wireless headsets enables these notifications to be performed by the same on-shift communicator who performs the state notifications.

The licensee proposes to replace the performance of on-shift notification by the STA/AO with the CRS/CFH. The on-shift notification function is currently augmented by one position within 30 minutes and two additional positions within 60 minutes of notification. These augmentation resources would report to the EOF, assume the function once the EOF is activated and would be managed by the Emergency Director. The licensee states that the current communication protocol may remain within the Control Room for the first 60 minutes, regardless of the presence of any prior ERO augmentation. The licensee's post-shutdown OSA concluded that in a permanently defueled condition, the CRS/CFH can perform this required SEP action in a timely manner and that there are no collateral duties identified that would prevent the timely performance of this emergency plan function. The staff reviewed the licensee's post-shutdown OSA using the guidance provided in NEI 10-05 (Reference 7).

The NRC requires that the licensee's EP be at a level of effectiveness commensurate with the potential consequences to public health and safety and common defense and security at the licensee's site. With the permanent cessation of operations and the permanent removal of the fuel from the reactor vessel at VY, most of the accident scenarios postulated for an operating power reactor are no longer possible. The irradiated fuel is now stored in the SFP and will remain on-site until it can be moved off-site for long-term storage or disposal. The reactor, RCS, and reactor support systems are no longer in operation and have no function related to the storage of the irradiated fuel. Therefore, postulated accidents involving failure or malfunction of the reactor, RCS, or reactor support systems are no longer applicable. During reactor decommissioning, the principal public safety concerns involve the radiological risks associated with the storage of spent fuel on-site. The proposed level of on-site operations staff will continue to provide for communication and coordination capabilities with off-site organizations for the level of support required for the remaining DBAs and the prompt implementation of mitigative actions in response to an SFP accident. Additionally, the licensee continues to maintain the same level of communications equipment capabilities to perform timely communications with the required off-site agencies.

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed level of the on-shift staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of

credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.3 Major Functional Area: Radiological Accident Assessment and Support of Operational Accident Assessment: Off-site Dose Assessment

The purpose of conducting the off-site dose assessment is to review radiological conditions using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessments based upon those changing radiological conditions, and recommend appropriate off-site protective measures. This function is currently performed by the Control Room staff (i.e., Shift Manager, CRS, Chemistry Technician and STA) and augmented by one person reporting to the EOF within 30 minutes of notification and assuming the off-site dose assessment function once the EOF is activated.

The licensee proposes to eliminate the on-shift positions of the STA and Chemistry Technician, and have the Shift Manager or CRS/CFH perform the task of off-site dose assessment. The licensee states that the proposed elimination of the STA and Chemistry Technician is appropriate in a permanently shutdown and defueled condition, since many of the potential initiating conditions, that would lead to an emergency declaration are no longer credible. The set of plant equipment involved in this condition is also greatly reduced, which also reduces the need for assessments and mitigation activities in the Control Room for an emergency. The post-shutdown OSA concluded that in a permanently shutdown and defueled condition, the CRS/CFH can perform the off-site dose assessment in a timely manner, and that there are no collateral duties that would prevent the timely performance of this emergency plan function. The staff reviewed the licensee's post-shutdown OSA using the guidance provided in NEI 10-05 (Reference 7).

The licensee provides that the Chemistry Technician is currently an on-shift position to collect and analyze a liquid sample if the applicable radiation monitor is not available during a release, or as directed by the Shift Manager. If the on-shift Chemistry Technician position is eliminated, the on-shift Radiation Protection Technician will be able to perform sampling and analysis, so as not to delay information potentially needed by the Shift Manager in determining if an emergency declaration is required. For gaseous releases, the only credible scenario would be to mechanically damage spent fuel during handling or by impact of a heavy object. Plant activities that could potentially cause mechanical damage will require that a Chemistry Technician be on-site or that the radiation monitor, as listed in the gaseous effluent emergency action levels (EALs), be in service; thereby alleviating a potential delay in sample analysis to determine EAL applicability. The licensee revised the applicable fuel handling procedures to incorporate this as a prerequisite prior to fuel handling activities. Additionally, the licensee provides that the post-shutdown OSA confirmed that no chemistry job tasks were noted as being required within the first 90 minutes of any of the analyzed events. The staff reviewed the licensee's post-shutdown OSA using the guidance provided in NEI 10-05 (Reference 7).

The elimination of the STA position is discussed in Section 3.4.1 below.

The NRC requires that the licensee's EP be at a level of effectiveness commensurate with the potential consequences to public health and safety and common defense and security at the licensee's site. With the permanent cessation of operations and the permanent removal of the

fuel from the reactor vessel at VY, most of the accident scenarios postulated for an operating power reactor are no longer possible. The irradiated fuel is now stored in the SFP and will remain on-site until it can be moved off-site for long-term storage or disposal. The reactor, RCS, and reactor support systems are no longer in operation and have no function related to the storage of the irradiated fuel. Therefore, postulated accidents involving failure or malfunction of the reactor, RCS, or reactor support systems are no longer applicable. During reactor decommissioning, the principal public safety concerns involve the radiological risks associated with the storage of spent fuel on-site. The proposed level of on-site operations staff will continue to provide for communication and coordination capabilities with off-site organizations for the level of support required for the remaining DBAs and the prompt implementation of mitigative actions in response to an SFP accident. The Shift Manager or CRS/CFH will maintain the capability to perform the function of the on-shift dose assessment.

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed change to the level of on-shift staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.4 Major Functional Area: Plant System Engineering

3.4.1 Major Task: Technical Support - Shift Technical Advisor

The emergency planning function of the STA is to perform independent assessments of plant operating concerns, technical support, appropriate corrective actions, analysis of events and their effects, effectiveness of response(s) to emergent conditions, classifications of emergencies, protection of the public, and any other actions related to critical safety functions and plant safety during abnormal and emergency situations. The STA also contributes to operations during normal plant conditions. By routine monitoring of equipment and plant operations, the STA can focus on preventative actions in order to mitigate the consequences of an accident. Additionally, the STA provides the core/thermal hydraulics function of the emergency plan for the confirmation of adequacy of core cooling, maintenance of coolable core geometry, and to verify that actual plant response to the event is as expected until relieved by the TSC Reactor Engineer within 30 minutes of notification.

Because of the permanent cessation of operations and removal of fuel from the reactor vessel at VY, the licensee proposes to eliminate the STA position from the emergency plan, since this condition no longer makes the position necessary for technical and analytical assistance for plant operational concerns during abnormal and emergency situations, analysis of events and their effects, or the on-shift core/thermal hydraulics function of the emergency plan, as described previously. The on-shift technical support function for the remaining accident scenarios associated with the storage of spent fuel will be assumed by the Control Room personnel. The licensee's post-shutdown OSA concluded that the on-shift Shift Manager and CRS/CFH can perform any required technical analysis associated with the storage of spent fuel until augmented by the proposed TSC Engineering Coordinator, in a timely manner; and that there are no collateral duties that would prevent the timely performance of this task. The staff reviewed the licensee's post-shutdown OSA using the guidance provided in NEI 10-05 (Reference 7).

The NRC requires that the licensee's EP be at a level of effectiveness commensurate with the potential consequences to public health and safety and common defense and security at the licensee's site. With the permanent cessation of operations and the permanent removal of the fuel from the reactor vessel at VY, most of the accident scenarios postulated for an operating power reactor are no longer possible. The irradiated fuel is now stored in the SFP and will remain on-site until it can be moved off-site for long-term storage or disposal. The reactor, RCS, and reactor support systems are no longer in operation and have no function related to the storage of the irradiated fuel. Therefore, postulated accidents involving a failure or malfunction of the reactor, RCS, or reactor support systems are no longer applicable. During reactor decommissioning, the principal public safety concerns involve the perceived radiological risks associated with the storage of spent fuel on-site. The proposed level of on-site operations staff will continue to provide for communication and coordination capabilities with off-site organizations for the level of support required for the remaining DBAs and the prompt implementation of mitigative actions in response to an SFP accident. The Shift Manager or CRS/CFH will maintain the capability to perform the function of on-shift technical analysis for the limited applicable accident scenarios associated with the storage of spent fuel.

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed change to the level of on-shift staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.5 Major Functional Area: Repair and Corrective Actions

3.5.1 Major Task: Mechanical Maintenance

The mechanical maintenance function provides for minor or limited scope damage repair and corrective actions. NEI 10-05 (Reference 7) defines repair and corrective action as:

An action that can be performed promptly to restore a nonfunctional component to functional status (e.g., resetting a breaker), or to place a component in a desired configuration (e.g., open a valve), and which does not require work planning or implementation of lockout/tag out controls to complete.

The licensee proposes to replace the on-shift AO, who is currently assigned this function as a collateral duty, with a CRO/AO/NCO. Changing the designation of the individual fulfilling the position of the on-shift AO, with an expanded list of qualified individuals designated as CROs/AOs/NCOs, is an administrative change. The on-shift CROs/AOs/NCOs would have the necessary expertise and training to perform troubleshooting and minor repairs during the permanently defueled condition. The CROs/AOs/NCOs would be available to satisfy any minor troubleshooting and repair activities that might be needed. The VY CROs/AOs/NCOs are currently trained to perform the actions associated with the repair and corrective action functional area. The licensee's post-shutdown OSA concluded that in a permanently shutdown and defueled condition, the CROs/AOs/NCOs can perform this required SEP action in a timely manner and that there are no collateral duties that would prevent the timely performance of this task. The staff reviewed the licensee's post-shutdown OSA using the guidance provided in NEI 10-05 (Reference 7).

NUREG-0654, Table B-1 (Reference 6), indicates that repair and corrective action tasks may be performed by qualified shift personnel assigned to other emergency response functions/tasks (i.e., collateral duties). In addition, repair and corrective action is an acceptable collateral duty in accordance with the guidance in NEI 10-05 (Reference 7). Therefore, the proposed change does not represent a deviation from NUREG-0654, Table B-1 (Reference 6).

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed change to the level of on-shift staffing is administrative and continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.5.2 Major Task: Rad Waste Operator

The Rad Waste Operator function provides for minor or limited scope damage repair and corrective actions, similar to those discussed in Section 3.5.1.

The licensee provides that an AO or CRO currently performs the function of the Rad Waste Operator. The licensee proposes to replace the AO/CRO with a CRO/AO/NCO. Changing the designation of the individual fulfilling the position of the on-shift AO with an expanded list of qualified individuals designated as CROs/AOs/NCOs is an administrative change. The licensee states that the CROs/AOs/NCOs are trained to perform the actions associated with the repair and corrective action functional area during the permanently defueled condition. The licensee's post-shutdown OSA concluded that in a permanently defueled condition, the CROs/AOs/NCOs can perform this required SEP action in a timely manner and that there are no collateral duties that would prevent the timely performance of this task. The staff reviewed the licensee's post-shutdown OSA using the guidance provided in NEI 10-05 (Reference 7).

NUREG-0654, Table B-1 (Reference 6), indicates that repair and corrective action tasks may be performed by qualified shift personnel assigned to other emergency response functions/tasks (i.e., collateral duties). In addition, repair and corrective action is an acceptable collateral duty in accordance with the guidance in NEI 10-05 (Reference 7). Therefore, the proposed change does not represent a deviation from NUREG-0654, Table B-1 (Reference 6).

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed change to the level of on-shift staffing is administrative and continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.5.3 Major Task: Electrical Maintenance/Instrument and Control Technician

The electrical maintenance/instrument and control function provides for minor or limited scope damage repair and corrective actions, such as identification and correction of controller and set point maladjustments, tripped breakers and overloads, surveillance necessary for accident mitigation and/or hands off troubleshooting.

The licensee provides that an AO currently performs the function of the on-shift Electrical Maintenance/Instrument and Control Technician. The licensee states that the function of this position is to provide for minor or limited scope damage repair and corrective actions, such as identification and correction of controller and set point maladjustments, tripped breakers and overloads, surveillance necessary for accident mitigation and/or inspection/troubleshooting, and proposes to replace the AO with a CRO/AO/NCO. Changing the designation of the individual fulfilling the position of the on-shift AO, with an expanded list of qualified individuals designated as CROs/AOs/NCOs, is an administrative change. The on-shift CROs/AOs/NCOs have the necessary expertise and training to perform troubleshooting, and minor repairs during the permanently defueled condition. The post-shutdown OSA concluded that in a permanently shutdown and defueled condition, CROs/AOs/NCOs can perform this required SEP action in a timely manner and that there are no collateral duties that would prevent the timely performance of this task. The staff reviewed the licensee's post-shutdown OSA using the guidance provided in NEI 10-05 (Reference 7).

NUREG-0654, Table B-1 (Reference 6) indicates that repair and corrective action tasks may be performed by qualified shift personnel assigned to other emergency response functions/tasks (i.e., collateral duties). In addition, repair and corrective action is an acceptable collateral duty in accordance with the guidance in NEI 10-05 (Reference 7). Therefore, the proposed change does not represent a deviation from NUREG-0654, Table B-1 (Reference 6).

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed change to the level of on-shift staffing is administrative and continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.6 Major Functional Area: Protective Actions (In-Plant)

The licensee's SEP currently has two AOs provided for this position and proposes to replace the two AOs with two CROs/AOs/NCOs. Changing the designation of the individuals fulfilling the position of the on-shift AO with an expanded list of qualified individuals, designated as CROs/AOs/NCOs, is an administrative change.

The licensee provides that in the original SEP, radiological access control was a labor-intensive task. Dedicated RP Technicians were required to check dose margins, training qualifications, and to ensure that workers had read and understood their radiation work permit. Worker access control is now automated because RP work processes have been computerized. Radiation work permit access control and electronic dosimeter computer systems work together to provide a fully integrated system, allowing workers to sign-in on their radiation work permit and to self-issue electronic dosimeters. The electronic dosimeter provides the worker with a continuous status of dose received and work area dose rates, and will alarm at preset dose and dose rate alarms. Access control is maintained because the worker must obtain an electronic dosimeter and enter a radiation work permit number into the access control computer system, prior to being allowed access into the Radiologically Controlled Area (RCA). Additionally, personnel are required and trained to self-monitor for radioactive contamination whenever they exit the RCA. NUREG-0654, Table B-1 indicates that protective action (in-plant) tasks may be performed by

qualified shift personnel assigned other emergency response functions/tasks. The licensee relies on the availability of computer systems, electronic dosimeters and enhanced processes to relieve RP Technicians of access control, personnel monitoring and dosimetry tasks; thereby, freeing the RP Technicians to cover any vital response activities.

Based on the NRC staff's review of the analysis in this section, the staff finds that the proposed change to the level of on-shift staffing is administrative and continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.7 Licensee Emergency Response Organization Changes

The proposed changes to the SEP will eliminate non-minimum (i.e., not required for facility activation), augmented ERO positions currently identified in the VY SEP under:

- Table 8.3, "A Summary of Off-site Coordination,"
- Figure 8.2, "VY Emergency Management Organization,"
- Figure 8.3, "Technical Support Center Emergency Organization,"
- Figure 8.4, "Operations Support Center Emergency Organization,"
- Figure 8.5, "Emergency Operations Facility Organization,"
- Figure 8.7, "Joint Information Center Organization," and
- Table 9.1, "Vermont Yankee Emergency Response."

Specific positions identified for elimination, as summarized in the sections below, are listed in Section 1.0 of this safety evaluation and Table 1 of Attachment 1 to the licensee's March 24, 2014, letter (Reference 2).

In the permanently shutdown and defueled condition, VY will maintain ERO teams, with one complete team being on duty and another on-call at any given time. When the Shift Manager directs the activation of the ERO call out system, ERO members are notified to facilitate adequate coverage of ERO positions at their designated emergency response facilities (ERF).

The licensee's March 24, 2014 letter (Reference 2) states:

VY requires members to act promptly in reporting to their assigned ERF, even when not on duty. During duty periods, the procedure further requires that team members respond within the required response time for their ERF (unless a longer time frame is specified for their specific ERO position) and that they remain fit for duty throughout the duty assignment. Individuals are trained to respond to their ERF even if they are not on duty. Excess personnel that respond may be assigned support responsibilities or be designated as a relief shift....

The proposed revisions to the SEP will not change these requirements. It will continue to be a management expectation that all duty and support ERO members report to their respective ERF as quickly as possible.

Currently, VY maintains a minimum of four (4) persons per ERO position as specified in SEP Table 8.4, Note 3. In order to provide flexibility and optimize the staff available in the permanently shutdown and defueled condition, SEP Table 8.4, Note 3, is being revised to remove the minimum number of persons per ERO position and states the following:

ENVY has designated ERO members who staff positions required to meet [the] minimum staffing to activate the TSC, OSC and EOF. The minimum staff positions required to activate the TSC and EOF are shown in E Plan [SEP] Figures 8.3 and 8.5. The OSC Manager is the only position required to activate and staff the OSC. All ERO personnel are expected to respond when notified by the emergency call-in notification system.

Although ERO activation/response time requirements will be unchanged, the elimination of credible accidents involving an operating power reactor provides additional time to plan and execute assessment and mitigation actions. The licensee maintains that the proposed changes do not impact the capability to assess and monitor actual or potential off-site consequences of a radiological emergency and the ability to promptly implement SFP mitigation actions. Appropriate assessment and mitigation actions are within the capabilities of the reduced TSC/OSC/EOF staff.

The licensee further states that the ERFs will continue to be activated at an Alert or higher declaration. Functional responsibilities of the positions eliminated, as a result of the changes, will be reassigned to remaining positions. The licensee states that the proposed ERO staffing reductions continue to address the risks to the public health and safety, and comply with the SEP, site commitments, and applicable regulations.

In the licensee's March 24, 2014, letter (Reference 2), it included Attachment 5, "Vermont Yankee Nuclear Power Station ERO Task Analysis," which contains details for each current position in the ERFs: OSC, TSC, EOF, and JIC. Each current ERO position is identified and the associated duties are captured in the ERO Task Analysis. The duties of the EOF and JIC positions that are proposed to be eliminated were reviewed and analyzed to identify the key duties associated with the position; and the duties were then evaluated against the planning standards in NUREG-0654/FEMA-REP-1, Revision 1, and the following VY procedures:

- EN-EP-801, "Emergency Response Organization,"
- EN-TQ-1 10, "Emergency Response Organization Training," and
- EN-TQ-1 10-01, "Fleet Emergency Plan Training Course Summary."

To validate the results of the analysis, three training drills conducted by the licensee in the fourth quarter of Calendar Year 2014, prior to the requested approval date. The drills were conducted to provide an opportunity for the licensee to confirm the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility and to utilize the post-shutdown procedures, currently being developed depicting the revised assignment of duties. The drills were also used to train and qualify post-shutdown ERO members, evaluate and validate the ability to accomplish the stated mission of each ERF, and to ensure that the planning standard functions are preserved with no degradation in time-sensitive activities or in

the ability to communicate with off-site response organizations. The drills were also conducted to validate that the post-shutdown ERO continues to address the risks to the public health and safety in the permanently defueled condition and to comply with the VY SEP as proposed, site commitments and applicable regulations.

NRC staff and FEMA observed the training drills conducted by the licensee on November 12, 2014, and December 3, 2014, to independently confirm the ability of the proposed post-shutdown ERO to perform the necessary functions of each emergency response facility; and to utilize the post-shutdown procedures currently being developed to reflect the proposed revised assignment of duties. The licensee staffed the ERF with the ERO, as proposed, and responded to a scenario that escalated up to the General Emergency classification. The responsible off-site response organizations (OROs) were invited to participate in the drill; however, they did not participate. Therefore, the licensee personnel staffed the roles of the typical ORO responders in the applicable facilities, which were observed by FEMA. No issues with proposed on-shift and ERO staffing changes were identified during the NRC staff and FEMA observation of these drills.

3.7.1 Operations Support Center (OSC)

Currently, the OSC has the following positions:

- OSC Manager,
- Operations Support,
- I&C/Electrical Coordinator,
- Mechanical Coordinator,
- Radiological/Chemistry Coordinator,
- Work Control Coordinator, and
- OSC Log Keeper.

The licensee proposes to only maintain the OSC Manager position, and if at any time the OSC Manager determines that additional manpower is necessary to accomplish the mission of the OSC, the OSC Manager will contact the Administration and Logistics Coordinator in the EOF to arrange for augmentation by additional on-site personnel to support the emergency response functions of the OSC.

Licensee ERO staffing, as required by the current implementing procedures, is intended to address the risks to public health and safety inherent in an operating reactor. The risk in the permanently shutdown and defueled condition is significantly reduced. Many of the potential initiating conditions that would lead to an emergency declaration will no longer be credible. The set of plant equipment required in the permanently shutdown and defueled condition is also greatly reduced, which reduces the assessments and mitigation activities that the TSC/OSC must perform. The spectrum of credible accidents and operational events, and the quantity and complexity of activities required for safe storage of spent fuel is reduced, as compared to an operating power reactor. Restoration of equipment supporting spent fuel cooling and inventory will be the primary focus of emergency mitigation actions for the TSC/OSC, in a permanently shutdown and defueled condition. In addition, the elimination of credible accidents involving an operating power reactor provides additional time to plan and execute assessment and mitigation actions.

The primary events of concern in the immediate post-shutdown and defueled condition will be a fuel handling accident and a loss of SFP cooling and/or water inventory. During fuel handling activities, there will be extra personnel on-site that will, in the event that a fuel handling accident were to occur, be able to respond to the event. Events involving a loss of SFP cooling and/or water inventory can be addressed by implementation of the SFP inventory makeup strategies, as required under 10 CFR 50.54(hh)(2). These strategies will also continue to be required as License Condition 3.N, "Mitigation Strategy License Condition." OSC staff is not relied upon to implement SFP inventory makeup. As such, elimination of the Operations Support, I&C/Electrical Coordinator, Mechanical Coordinator, Radiological/Chemistry Coordinator, Work Control Coordinator, and OSC Log Keeper positions do not impact the ability of the ERO to perform the required function based on the permanent shutdown and defueled condition of the facility. As discussed previously in Section 3.7, NRC staff and FEMA observed the training drills conducted by the licensee on November 12, 2014, and December 3, 2014, to independently confirm the ability of the proposed post-shutdown ERO to perform the necessary functions of each emergency response facility; and to utilize the post-shutdown procedures currently being developed to reflect the proposed revision to the assignment of duties. No issues with the proposed on-shift and ERO staffing changes were identified during NRC staff and FEMA observation of these drills.

Based on the NRC staff's review of the analysis addressed above, the staff finds that the proposed change to the level of ERO staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement SFP mitigation actions.

3.7.2 Technical Support Center (TSC)

Currently, the TSC has the following positions:

- Emergency Plant Manager,
- TSC Manager,
- Operations Coordinator,
- Radiological Coordinator,
- TSC Reactor Engineer,
- Engineering Coordinator,
- Maintenance Coordinator,
- Manpower and Planning Liaison,
- ENS Communicator,
- TSC Communicator,
- TSC Engineers, and
- IT Specialist.

The licensee proposes to only maintain the following TSC positions:

- Emergency Plant Manager,
- Operations Coordinator,
- Radiological Coordinator,

- Engineering Coordinator, Maintenance Coordinator, and
- ENS Communicator.

The proposed staffing change eliminates one minimum required staff ERO position, the TSC Reactor Engineer. The primary function of the TSC Reactor Engineer is to provide confirmation of adequacy of core cooling, maintenance of coolable core geometry, and to verify that actual plant response to the event is as expected. The on-shift STA currently performs this function under the guidance of the Shift Manager until relieved by the TSC Reactor Engineer. As discussed previously in Section 3.4.1, the licensee is proposing to eliminate the STA position, and for the Shift Manager or CRS/CFH to inherit the on-shift technical analysis function for the limited applicable accident scenarios in the permanently defueled and shutdown condition of the reactor. The current VY staffing requirement is to augment the on-shift core/thermal hydraulics capability provided by the STA with a TSC Reactor Engineer within 30 minutes of notification.

The NRC requires that the licensee's EP be at a level of effectiveness commensurate with the potential consequences to public health and safety and common defense and security at the licensee's site. With the permanent cessation of operations and the permanent removal of the fuel from the reactor vessel at VY, most of the accident scenarios postulated for an operating power reactor are no longer possible. The irradiated fuel is now stored in the SFP and will remain on-site until it can be moved off-site for long-term storage or disposal. The reactor, RCS, and reactor support systems are no longer in operation and have no function related to the storage of the irradiated fuel. Therefore, the major task of evaluating core/thermal hydraulics is not necessary in this permanently shutdown and defueled condition. Therefore, the licensee concluded that the core/thermal hydraulics function could be eliminated without increasing the risk to the public health and safety because the major task of evaluating core/thermal hydraulics is not necessary in a permanently shutdown and defueled condition.

Additionally, the licensee states that the three duties for the TSC Reactor Engineer also include: determining and providing an estimate of core damage, assisting in implementation of Severe Accident Management Guidelines and providing core parameter information results. Any other TSC Reactor Engineer duties described in the implementing procedures that are unrelated to core assessment, such as assisting the Emergency Plant Manager and Engineering Coordinator; providing recommendations to plant operators; and assisting in the development of emergency procedures are either no longer necessary in a permanently shutdown and defueled condition or will be performed by other members of the post-shutdown ERO.

As discussed previously in Section 3.7.1, the current ERO staffing required by the implementing procedures is intended to address the risks to public health and safety inherent in an operating power reactor. The risk in the permanently shutdown and defueled condition is significantly reduced. Remaining ERO positions will inherit duties from eliminated positions, but do not impact the ability of the ERF, as a whole, to perform its designated mission for the scope of remaining applicable accidents. As such, elimination of the TSC Manager, Manpower and Planning Liaison, TSC Communicator, TSC Engineers, and IT Specialist positions do not impact the ability of the ERO to perform the required function based on the permanent shutdown and defueled condition of the facility. As discussed previously in Section 3.7, NRC staff and FEMA observed the training drills conducted by the licensee on November 12, 2014, and December 3, 2014, to independently confirm the ability of the proposed post-shutdown ERO to perform the necessary functions of each emergency response facility; and to utilize the post-shutdown

procedures currently being developed to reflect the proposed revised assignment of duties. No issues with the proposed on-shift and ERO staffing changes were identified during NRC staff and FEMA observation of these drills.

Based on the NRC staff's review of the analysis addressed above, the staff finds that the proposed change to the level of ERO staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.7.3 Emergency Operations Facility (EOF)

Currently, the EOF has the following positions:

- Emergency Director,
- EOF Manager,
- Technical Advisor,
- EOF Communicator,
- Radiological Assessment Coordinator,
- Off-site Communicator,
- Public Information Liaison,
- Lead Off-site Liaison,
- Off-site Team Coordinator,
- Administration and Logistics Coordinator,
- Emergency Planning Coordinator,
- IT Specialist,
- Dose Assessor,
- Off-site Liaisons,
- Personnel and Equipment Monitor, and
- EOF Log Keeper.

The licensee proposes to only maintain the following EOF positions:

- Emergency Director,
- Technical Advisor,
- Radiological Assessment Coordinator,
- Off-site Communicator,
- Lead Off-site Liaison,
- Off-site Team Coordinator,
- Administration and Logistics Coordinator,
- Dose Assessor,
- Off-site Liaisons, and
- Personnel and Equipment Monitor.

The duties of the eliminated EOF Manager position that are not currently performed redundantly by other ERO positions will not be eliminated, but will be transferred to the Emergency Director,

Administration and Logistics Coordinator, Technical Advisor, Lead Off-site Liaison, or the Off-site Communicator in the EOF.

As discussed previously in Section 3.7.1, the current ERO staffing required by the implementing procedures is intended to address the risks to public health and safety inherent in an operating power reactor. The risk in the permanently shutdown and defueled condition is significantly reduced. Remaining ERO positions will inherit duties from eliminated positions, but do not impact the ability of the ERF, as a whole, to perform its designated mission for the scope of remaining applicable accidents. As such, elimination of the EOF Manager, EOF Communicator, Public Information Liaison, Emergency Planning Coordinator, IT Specialist, and EOF Log Keeper positions do not impact the ability of the ERO to perform the required function based on the permanent shutdown and defueled condition of the facility. As discussed previously in Section 3.7, NRC staff and observed the training drills conducted by the licensee on November 12, 2014, and December 3, 2014, to independently to confirm the ability of the proposed post-shutdown ERO to perform the necessary functions of each emergency response facility; and to utilize the post-shutdown procedures currently being developed to reflect the proposed revised assignment of duties. No issues with proposed on-shift and ERO staffing changes were identified during NRC staff and FEMA observation of these drills.

Based on the NRC staff's review of the analysis addressed above, the staff finds that the proposed change to the staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.7.4 Joint Information Center (JIC)

Currently, the JIC has the following positions:

- Company Spokesperson,
- JIC Manager,
- Information Coordinator,
- Press Release Writer, Logistics Coordinator,
- Technical Assistant,
- Technical Advisor,
- JIC Log Keeper,
- Inquiry Response Coordinator,
- Inquiry Responder,
- Media Monitor/Status Phone Recorder,
- Media Monitor,
- Media Liaison, and
- Credentialing.

The licensee proposes to only maintain the following JIC positions:

- Company Spokesperson,
- JIC Manager,

- Technical Advisor,
- Inquiry Responder,
- Media Monitor, and
- Media Liaison.

As discussed previously in Section 3.7.1, the current ERO staffing required by implementing procedures is intended to address the risks to public health and safety inherent in an operating power reactor. The risk in the permanently shutdown and defueled condition is significantly reduced. Remaining ERO positions will inherit duties from eliminated positions, but do not impact the ability of the ERF, as a whole, to perform its designated mission for the scope of remaining applicable accidents. As such, elimination of the Information Coordinator, Press Release Writer, Logistics Coordinator, Technical Assistant, Inquiry Responder, Media Monitor, and Media Liaison positions do not impact the ability of the ERO to perform the required function based on the permanent shutdown and defueled condition of the facility. As discussed previously in Section 3.7, NRC staff and observed the training drills conducted by the licensee on November 12, 2014, and December 3, 2014, to independently confirm the ability of the proposed post-shutdown ERO to perform the necessary functions of each emergency response facility; and to utilize the post-shutdown procedures currently being developed to reflect the proposed revised assignment of duties. No issues with proposed on-shift and ERO staffing changes were identified during NRC staff and FEMA observation of these drills.

Based on the NRC staff's review of the analysis addressed above, the staff finds that the proposed change to the staffing continues to meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, commensurate with the reduced spectrum of credible accidents in the permanently shutdown and defueled condition, and that the licensee retains the ability to promptly implement the SFP mitigation actions.

3.7.5 Potential Impact of Staff Changes on Off-site Emergency Response Organizational Interfaces

In a May 5, 2014, letter (Reference 8), the NRC staff requested additional information related to whether the proposed changes to the VY SEP were evaluated for their impact on State and local REP plans approved by FEMA. Specifically the staff sought further clarity in regards to:

- licensee interface and coordination with State and local response organizations;
- the evaluation performed; and
- documentation regarding discussions with affected State and local response organizations used in making the licensee's determination.

In a letter dated May 21, 2014 (Reference 3), the licensee noted that the proposed changes to the VY SEP were evaluated for impacts on the ability of State and local response organizations to effectively implement their FEMA-approved REP plans. This evaluation included a review of the following REP plans:

- State of Vermont Emergency Operations Plan 2013, Incident Annex 9A, "Vermont Radiological Emergency Response Plan;"

- New Hampshire State Emergency Operations Plan Incident Annex, "Radiological Emergency Response for Nuclear Facilities," and Attachment A, "Implementing Procedures for State Agencies," dated January 2014; and
- Massachusetts Standard Operating Procedures in Support of the Radiological Emergency Response Plan MEMA Region III/IV, dated February 2013.

The proposed changes involve the elimination of the EOF Manager and JIC Logistics Coordinator positions that have tasks that involve direct interface with State and local officials. The licensee has addressed the elimination of these ERO positions that interface with off-site representatives by transferring such necessary tasks to remaining positions. Reviews of the proposed changes for impact on their REP plans by representatives from the emergency management agencies from Vermont, New Hampshire, and Massachusetts was documented by email exchange, confirming that the States had not identified any interface or coordination impediments as a result of the elimination of the designated positions in the EOF and JIC.

The NRC staff provided copies of these emails to FEMA in an August 6, 2014 letter, "Vermont Yankee Pre-Exemption Emergency Plan – Request From Entergy Nuclear Operations, Inc. For Approval to Eliminate Certain Emergency Response Organization Positions" (Reference 9), and requested FEMA's review and concurrence of the licensee's proposed ERO changes, which eliminated the EOF Manager and JIC Logistics Coordinator positions that interfaced with State and local officials. In an August 19, 2014, letter, "Vermont Yankee Pre-Exemption Emergency Plan – Request From Entergy Nuclear Operations, Inc. For Approval to Eliminate Certain Emergency Response Organization Positions" (Reference 10), FEMA responded that the changes were not significant pursuant to 44 CFR 350.14(b), thus not requiring a review by FEMA of the affected State and local plans.

As stated previously, NRC staff and observed the training drills conducted by the licensee on November 12, 2014, and December 3, 2014, to independently confirm the ability of the proposed post-shutdown ERO to perform the necessary functions of each emergency response facility and to utilize the post-shutdown procedures currently being developed to reflect the proposed revised assignment of duties. The licensee staffed the ERF with the ERO as proposed and responded to a scenario that escalated up to the General Emergency classification. The responsible off-site response organizations (OROs) were invited to participate in the drill; however, they did not participate. Therefore, licensee personnel staffed the roles of the typical ORO responders in the applicable facilities and were observed by FEMA.

FEMA provided the following statement based on its observations:

FEMA Region 1 Radiological Emergency Preparedness (REP) staff observed VY post-shutdown EP drills on November 12, 2014, and December 3, 2014. Based on our observations, FEMA Region 1 REP Program believes that the proposed staffing reductions at VY will not degrade the interface between the licensee's staff and the off-site response organizations at the JIC and the EOF.

Based on the NRC staff's observations of the drills, no issues were identified with respect to the proposed staffing changes regarding off-site ERO interfaces for the permanently shutdown and defueled condition.

3.8 Summary

The NRC staff finds that the proposed emergency plan changes meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, and provide reasonable assurance that adequate protective measures can and will continue to be taken in the event of a radiological emergency, commensurate with the reduced spectrum of credible accidents in the permanently shutdown and defueled condition. Therefore, the NRC staff approves the licensee's proposed changes to the VY SEP contained in its application dated March 24, 2014, and as supplemented by letters dated May 21, 2014, and August 14, 2014.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

According to 10 CFR 50.91(a)(3), the Commission will not make and will not publish a final determination on no significant hazards consideration, unless it receives a request for a hearing on the license amendment request. In this case, there was a request for a hearing on the licensee's request to change its staffing at VY, following the facility's permanent cessation of operations and permanent defueling. Therefore, the Commission has made the following final no significant hazards consideration determination.

The Commission's regulations in 10 CFR 50.92(c) state that the Commission may make a final determination that a proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration which is presented below.

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes to the SEP do not impact the function of plant structures, systems, or components (SSCs). The proposed changes do not affect accident initiators or precursors, nor does it alter design assumptions. The proposed changes do not prevent the ability of the on-shift staff and ERO to perform their intended functions to mitigate the consequences of any accident or event that will be credible in the permanently defueled condition. The proposed changes only remove positions that will no longer be credited in the SEP in the permanently defueled condition.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes reduce the number of on-shift and ERO positions commensurate with the hazards associated with a permanently shutdown and defueled facility. The proposed changes do not involve installation of new equipment or modification of existing equipment, so that no new equipment failure modes are introduced. Also, the proposed changes do not result in a change to the way that the equipment or facility is operated so that no new accident initiators are created.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed changes are associated with the SEP staffing and do not impact operation of the plant or its response to transients or accidents. The change does not affect the Technical Specifications. The proposed changes do not involve a change in the method of plant operation, and no accident analyses will be affected by the proposed changes. Safety analysis acceptance criteria are not affected by the proposed changes. The revised SEP will continue to provide the necessary response staff with the proposed changes.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's no significant hazards consideration analysis. The NRC received comments on the no significant hazards consideration determination from the State of Vermont (see Section 5.0). The staff considered these comments with respect to the no significant hazards consideration determination, and determined that the comments were not applicable to the no significant hazards consideration determination. As such, the comments were reviewed and considered as part of the State Consultation process, as described in Section 5.0. Section 5.0 provides the staff's response to each of the comments received. Based on this review and on the NRC staff's safety evaluation of the underlying license amendment request, the NRC staff concludes that the three standards of 10 CFR 50.92(c) are satisfied. Accordingly, the NRC staff makes a final determination that no significant hazards consideration is involved.

Pursuant to 10 CFR 50.91(a)(4), since the NRC staff has determined that no significant hazards consideration is involved and that the amendment should be issued, the amendment will be effective as stated in the amendment, even though an interested person meeting the provisions for intervention called for in 10 CFR 2.309 has filed a request for a hearing.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the NRC published this proposed license amendment in the *Federal Register* (FR) on July 22, 2014 (79 FR 42546) for a 30-day comment period and a 60-day request for hearing period. The Commission received two sets of comments from the State of Vermont, Department of Public Service. Provided below are the comments received and the NRC staff's responses to those comments.

By letter dated August 21, 2014, ADAMS Accession No. ML14239A030 (Reference 11):

Comment	NRC Staff Response
<p>Recognizing the Vermont Public Service Department is designated as the State Liaison, it is the view of DEMHS [the Vermont Division of Emergency Management and Homeland Security] that the NRC should require licensees to integrate Off-site Response Organizations at the state level ahead of LARs [license amendment requests] relating to any emergency preparedness changes at the site. The NRC should also require the interaction to be documented as a part of the LAR submission.</p>	<p>The license amendment process is prescribed by regulation. While this process includes no requirement for licensees to consult with States before submitting license amendment requests, as a practical matter, consultation with States often occurs and is often beneficial.</p> <p>10 CFR 50.91(b) requires that, at the time a licensee requests an amendment, the licensee must notify the State in which its facility is located.</p> <p>The regulation also provides that the Commission will advise the State by sending it a copy of the <i>Federal Register</i> notice regarding the submission of the license amendment request, will consider any comments of the State official, will ensure that the State is aware of the application before it issues the amendment, and, after issuing the amendment, will send a copy of its determination to the State.</p> <p>However, in order for a requested change to a licensee's emergency plans to be granted, the licensee must demonstrate that its emergency plans, as changed, satisfy the standards of 10 CFR 50.47(b) and the requirements of Appendix E to Part 50. These standards include specifying the interfaces among various on-site response activities and off-site support and response activities. Therefore, although a licensee is not required to consult with a State before submitting a</p>

	<p>license amendment request, with respect to emergency plans, some level of interaction with the State is likely necessary in order to accurately specify these interfaces.</p> <p>ENO's satisfaction of this interface standard is discussed above in SER Section 3.7.5, "Potential Impact of ERO Changes on Off-site Emergency Response Organizational Interfaces."</p> <p>In conclusion, while the State believes that licensees should be required to consult with the State prior to requesting emergency plan changes; the staff notes that, as a practical matter, consultation with the State will often occur in order to satisfy the standards of 10 CFR 50.47(b) and the requirements of Appendix E to Part 50.</p> <p>Therefore, staff does not agree with the comment.</p>
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By letter dated August 21, 2014, ADAMS Accession No. ML14239A029 (Reference 12):

LAR Section	Comment	Staff Response
<p>Attachment #1, 5.2.4.2</p>	<p>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.</p>	<p>The first paragraph of the licensee's analysis in LAR Section 5.2.4.2 discusses that the VY staffing requirement at issue is to augment the on-shift core/thermal hydraulics capability with a TSC Reactor Engineer within 30 minutes of notification. It further discusses that the function of the TSC Reactor Engineer is to provide confirmation of adequacy of core cooling, maintenance of coolable core geometry, and to verify that actual plant response to the event is as expected. This function is initially performed by the STA until the position is augmented.</p> <p>The second paragraph in this section discusses that the TSC Reactor Engineer position can be eliminated without increasing the risk to the public health and safety because the major task of evaluating core/thermal hydraulics is not necessary in a permanently shutdown and defueled condition. It does not justify the elimination of the TSC Reactor Engineer through the</p>

LAR Section	Comment	Staff Response
		<p>use of another position to perform this function. Instead, it indicates the function is no longer required to be performed by either on-shift personnel or augmented personnel, based on the permanently shutdown and defueled condition of the plant.</p> <p>Therefore, the staff does not agree with the comment.</p>
<p>Attachment #1, 1</p>	<p>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.)</p>	<p>The firefighting function of the on-shift staff is an emergency plan function, but the composition of the Fire Brigade is dictated by 10 CFR 50.48, "Fire protection." These positions are designated to be a collateral duty for the on-shift staff, and therefore, may be made up of various combinations of qualified on-shift personnel. This is demonstrated by the notes on Table 8.4 and Figure 8.1 of Attachment 3, which provide that these positions may be filled by shift personnel assigned other functions (i.e., as a collateral duty) and are staffed in accordance with the Technical Requirements Manual and Administrative procedures.</p> <p>Therefore, the staff does not agree with the comment.</p>
<p>Attachment #3, Table 8.4 page 2 of 2</p>	<p>Do the 2 Fire Brigade positions noted in Comment #2 need to be noted here?</p>	<p>No, the 2 Fire Brigade positions are for rescue operations and first aid, which are correctly identified as collateral positions in Figure 8.1 of Attachment 3.</p>
<p>Attachment #4, IV.C.1 & VI</p>	<p>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 shutdown Vermont Yankee station will have a means to receive electric power in the event of a loss of off-site electric</p>	<p>The licensee's amendment request is associated with changes to the Emergency Plan. With respect to this amendment request, it is important to note that the emergency action levels (EALs) associated with loss of electrical power would be maintained. The change in power or availability of equipment (systems,</p>

LAR Section	Comment	Staff Response
	<p>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.</p>	<p>structures and components) in the event of a station blackout would be covered by the existing EALs. The amendment request only addresses changes in staffing; it does not request any changes to their Technical Specifications or regulations associated with Station Blackout requirements. Subsequent requests for license amendments may address this issue, which the staff will review separately against our regulatory requirements under the license amendment process.</p> <p>Therefore, the comment is not applicable to the license amendment request.</p>
<p>Attachment #4, IV.C.2 & VI</p>	<p>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.</p>	<p>The license amendment request does not request any changes to the fire brigade, fire assessment equipment, or the fire protection equipment, which are comprised of the Fire Brigade, as dictated in 10 CFR 50.48, "Fire protection." Agreements currently in place with off-site fire response organizations are described in the current VY SEP.</p> <p>Therefore, the comment is not applicable to the license amendment request.</p>
<p>Attachment #4, II.C.9 & Subsequent E-Plan Tables</p>	<p>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 shutdown 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</p>	<p>The license amendment request does not request the removal of ERDS. Instead, the licensee requests a staffing reduction following the permanent defueling of VY. One fact used by ENO to support this requested staffing reduction is that the task of activating ERDS is no longer required by NRC regulations after the permanent defueling of VY. Therefore, the license amendment request does not itself request the removal of ERDS, but rather only states that the Commission's regulations provide that ERDS is not required after the permanent defueling of VY. In approving the license amendment request, the staff is not evaluating, or providing prior approval, for the removal of ERDS at VY, once the</p>

LAR Section	Comment	Staff Response
	<p>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 shutdown 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 shutdown 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.</p>	<p>facility is permanently shutdown and defueled.</p> <p>The licensee's statement that ERDS is not required after the permanent defueling of VY is correct. See 10 CFR Part 50, Appendix E, Section VI.</p> <p>Furthermore, Section 7.10 to the current Entergy VY SEP (Revision 54) provides that VY will maintain a continuous ERDS communication with the NRC Operations Center; it makes no commitment that ERDS will be provided by the licensee to the States. Instead, the licensee's commitments for the notification of the States of Vermont, New Hampshire, and Massachusetts and the content of these notifications are discussed in Sections 7.0, 8.5 and 11.1 of the VY SEP and Section 3.2 of this SER. ENO communicates from VY to the States through its InForm and NAS systems and through State representatives dispatched to the EOF; it does not communicate with the States through ERDS. ERDS data is provided to Vermont pursuant to a Memorandum of Understanding between Vermont and the NRC. See 62 Fed. Reg. 6281 (Feb. 11, 1997).</p> <p>Therefore, the comment is not applicable to the license amendment request.</p>

The NRC staff consulted with the State of Vermont official to discuss the staff responses to the comments on January 30, 2015. The State official had no additional comments.

6.0 ENVIRONMENTAL CONSIDERATION

The amendment changes requirements with respect to the installation or use of facility components located within the restricted area, as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released off-site, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has also determined that the amendment involves no significant hazards consideration. Accordingly, the amendment meets the eligibility criteria for categorical exclusion

set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

8.0 REFERENCES

1. Perito, Michael, Entergy Nuclear Operations Inc., letter to U.S. Nuclear Regulatory Commission, "Notification of Permanent Cessation of Power Operations," dated September 23, 2013 (ADAMS Accession No. ML13273A204).
2. Wamser, Christopher J., Entergy Nuclear Operations, Inc. letter to U.S. Nuclear Regulatory Commission, "Proposed Changes to the Vermont Yankee Emergency Plan," dated March 24, 2014 (ADAMS Accession No. ML14085A257).
3. Wamser, Christopher J., Entergy Nuclear Operations, Inc., letter to U.S. Nuclear Regulatory Commission, "Proposed Changes to the Vermont Yankee Emergency Plan - Supplement 1 (TAC No. MF3668)," dated May 21, 2014 (ADAMS Accession No. ML14149A048).
4. Wamser, Christopher J., Entergy Nuclear Operations, Inc., letter to U.S. Nuclear Regulatory Commission, "Proposed Changes to the Vermont Yankee Emergency Plan - Supplement 2 (TAC No. MF3668)," dated August 14, 2014 (ADAMS Accession No. ML14231A019).
5. U.S. Nuclear Regulatory Commission, Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," dated October 1981 (ADAMS Accession No. ML090440294).
6. U.S. Nuclear Regulatory Commission, Federal Emergency Management Agency (FEMA), NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," dated November 1980 (ADAMS Accession No. ML040420012).
7. NEI 10-05, Revision 0, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," dated June 2011 (ADAMS Accession No. ML111751698).
8. Kim, James, U.S. Nuclear Regulatory Commission, "Vermont Yankee Nuclear Power Station - Request for Additional Information Regarding License Amendment Request for Emergency Plan Change (TAC No. MF3668) (ADAMS Accession No. ML14115A029).

9. Anderson, Joseph D., U.S. Nuclear Regulatory Commission, letter to Vanessa Quinn, Federal Emergency Management Agency, "Vermont Yankee Pre-Exemption Emergency Plan - Request From Entergy Nuclear Operations, Inc. For Approval to Eliminate Certain Emergency Response Organization Positions," dated August 6, 2014 (ADAMS Accession No. ML14209A705).
10. Quinn, Vanessa E., Federal Emergency Management Agency, letter to Joseph Anderson, U.S. Nuclear Regulatory Commission, "Vermont Yankee Pre-Exemption Emergency Plan – Request From Entergy Nuclear Operations, Inc. For Approval to Eliminate Certain Emergency Response Organization Positions," dated August 19, 2014 (ADAMS Accession No. ML14233A593).
11. Leshinskie, Anthony R., State of Vermont, State Nuclear Engineer & Decommissioning Coordinator, "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" dated August 21, 2014 (ADAMS Accession No. ML14239A030).
12. Leshinskie, Anthony R., State of Vermont, State Nuclear Engineer & Decommissioning Coordinator, "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" dated August 21, 2014 (ADAMS Accession No. ML14239A029).

Principal Contributor: M. Norris, NSIR

Date: February 4, 2015

February 4, 2015

Vice President, Operations
Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
P.O. Box 250
Governor Hunt Road
Vernon, VT 05354

**SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION – ISSUANCE OF
AMENDMENT TO RENEWED FACILITY OPERATING LICENSE
RE: CHANGES TO THE EMERGENCY PLAN (TAC NO. MF3668)**

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 261 to Renewed Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station, in response to your application dated March 24, 2014, as supplemented by letters dated May 21, 2014, and August 14, 2014.

The amendment revises the site emergency plan for the permanently defueled condition to reflect changes in the on-shift staffing and Emergency Response Organization staffing.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

James Kim, Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures:

1. Amendment No. 261 to DPR-28
2. Safety Evaluation

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ADAMS Accession No.: ML14346A065

*via memo

OFFICE	DORL/LPL4-2/PM	DORL/LPL4-2/LA	DORL/LPL1-1/LA	NSIR/DPR/ORLOB/BC*	OGC - NLO
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DATE	12/17/14	12/16/14	12/17/14	12/10/14	12/23/14
OFFICE	DORL/LPL4-2/BC	NRR/DORL/DD	NRR/DORL/D	NRR/D	DORL/LPL4-2/PM
NAME	DBroaddus	GWilson (MKK for)	MEvans (GW for)	WDean	JKim
DATE	1/21/15	1/22/15	1/26/15	2/2/15	2/4/15

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