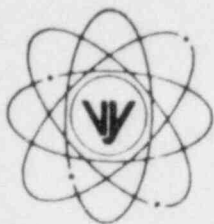


# VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

September 8, 1982

2.C.2.1  
FVY 82-99

REPLY TO:  
ENGINEERING OFFICE  
1671 WORCESTER ROAD  
FRAMINGHAM, MASSACHUSETTS 01701  
TELEPHONE 617-872-8100

United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: George H. Smith, Director  
Division of Emergency Preparedness  
and Operational Support

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) Letter, USNRC to VYNPC, "Emergency Preparedness Appraisal  
50-271/82-05," dated July 22, 1982

Dear Sir:

Subject: Response to Emergency Preparedness Appraisal

Reference (b) detailed the NRC staff's findings of the Emergency Preparedness Appraisal conducted during the period of March 16 - 24, 1982. We have reviewed the findings of appendices A and B of Reference (b) and our response to each has been prepared in the Attachment. Each response describes the items identified in Appendix A, and also discusses the results of our consideration of the items in Appendix B. Schedules for actions to be completed are also provided, where applicable.

Appendix C items of Reference (b) are currently being evaluated. A response to each item and page changes to the Emergency Plan, as necessary, will be prepared and are expected to be submitted on schedule. We will notify you as soon as possible if this schedule changes.

We trust this information is satisfactory; however, should you have any questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

*Warren P. Murphy*  
Warren P. Murphy  
Vice President and  
Manager of Operations

WPM/dm

8210220418 821012  
PDR ADOCK 05000271  
Q PDR

VERMONT YANKEE

ATTACHMENT A

RESPONSE TO

EMERGENCY PREPAREDNESS APPRAISAL REPORT

APPENDIX A

"SIGNIFICANT EMERGENCY PREPAREDNESS FINDINGS"

1. NRC FINDING

Perform a study to determine how the intent of the augmentation goals of NUREG-0654, Table B-1, can be achieved after the declaration of an emergency. The results of this study will be documented and a copy forwarded to the NRC Region I office for review and evaluation along with a description of compensatory measures for any augmentation goals not met.

RESPONSE

Vermont Yankee performed a study to determine how the intent of the augmentation goals of NUREG-0654, Table B-1, could be achieved after the declaration of an emergency. The results of the study, summarized in a June 16, 1982 letter to NRC Region I, demonstrated that the intent of the augmentation goals was generally met. Since that time, we have formalized the emergency notification method and further improvement will be realized with the plant phone system upgrade which will be completed early in 1983. NRC Inspection Report 50-271/82-11 reviewed the plant's response to this finding and confirmed that the finding had been adequately addressed.

2. NRC FINDING

Inspect and repair, as necessary, the reach rod couplings for the post-accident reactor water sampling panel to ensure proper valve manipulation.

RESPONSE

The Post-Accident Sample Panel (PASP) Valve reach rods have been inspected and repaired. Upon disassembly of the reach rods from the valve stems, technicians noted that the rod set screws were improperly aligned with the indentation on the valve stems. The set screws were realigned and retightened for all PASP valves with reach rods. Each valve was subsequently exercised to confirm proper engagement of the reach rod with the valves. This work was completed by April 30, 1982.

NRC Inspection Report 50-271/82-11 reviewed the plant's response to this finding and confirmed that the finding had been adequately addressed.

3. NRC FINDING

Evaluate whether containment samples are representative because of iodine plate-out in the sample vials and correct any deficiencies identified. Provide a written report on the results to the NRC Region I office.

RESPONSE

In response to this finding, a containment air sampling cylinder was sent for plate-out analysis to an outside consultant. The results indicate that the amount of plate-out, with methyl iodine testing, was less than 0.01%, as documented in our VYNPC letter to USNRC, dated June 30, 1982. We are continuing our analysis to determine elemental iodine plate-out characteristics and anticipate that this item will be satisfactorily resolved between our Staff and your Ms. Marie Mojta.

4. NRC FINDING

Resolve the problems with the meteorological sensor resulting from foliage growth in the vicinity of the meteorological tower.

RESPONSE

Evergreen trees were cut down on both sides of the primary meteorological tower to remove all foliage within approximately 100 feet from the tower. This action was completed prior to June 15, 1982, and the action was documented by our letter of June 30, 1982. NRC Inspection Report 50-271/82-11 reviewed the plant's response to this finding and confirmed that the finding had been adequately addressed.

NRC Inspection Report 50-271/82-11 reviewed the plant's response to this finding and confirmed that the finding had been adequately addressed.

3. NRC FINDING

Evaluate whether containment samples are representative because of iodine plate-out in the sample vials and correct any deficiencies identified. Provide a written report on the results to the NRC Region I office.

RESPONSE

In response to this finding, a containment air sampling cylinder was sent for plate-out analysis to an outside consultant. The results indicate that the amount of plate-out, with methyl iodine testing, was less than 0.01%, as documented in our VYNPC letter to USNRC, dated June 30, 1982. We are continuing our analysis to determine elemental iodine plate-out characteristics and anticipate that this item will be satisfactorily resolved between our Staff and your Ms. Marie Mojta.

4. NRC FINDING

Resolve the problems with the meteorological sensor resulting from foliage growth in the vicinity of the meteorological tower.

RESPONSE

Evergreen trees were cut down on both sides of the primary meteorological tower to remove all foliage within approximately 100 feet from the tower. This action was completed prior to June 15, 1982, and the action was documented by our letter of June 30, 1982. NRC Inspection Report 50-271/82-11 reviewed the plant's response to this finding and confirmed that the finding had been adequately addressed.

5. NRC FINDING

Revise the implementing procedures to direct the Emergency Director, Emergency Coordinator or Recovery Manager, as appropriate, to recommend either shelter or evacuation as core conditions or projected doses dictate to all the plume EPZ States (Vermont, New Hampshire and Massachusetts) and provide the criteria for making these recommendations. Provide training for those individuals on the criteria for making protective action recommendations relating to off-site consequences and provide off-site officials with an opportunity to review these criteria and their bases (see NUREG/CR-1131).

RESPONSE

Procedure OP-3511, "Off-Site Protective Action Recommendation", will be added to the Emergency Plan Implementing Procedure Manual. The procedure will establish plant criteria for making off-site protective action recommendations based on either projected dose or core cooling considerations. All other appropriate implementing procedures will be revised to state that the initial responsibility for issuance of a protective action recommendation rests with the Plant Emergency Director who, in turn, transfers this responsibility to the Site Recovery Manager upon his arrival at the site.

All procedures relative to this issue are currently being reviewed by Vermont State officials. The other EPZ States have been notified of this new protective action criteria in a YAEC letter, dated July 14, 1982. Due to the impact that these State officials have had on the revision process, a request for an extension of the original CAL 82-13 commitment date was made and granted by USNRC letter to VYNPC, dated July 30, 1982. We anticipate that this work will be completed by September 30, 1982.

6. NRC FINDING

Revise the procedure containing Emergency Action Levels (EALs) to address the requirements of NUREG-0654, Appendix 1. Train the Control Room staff and other appropriate individuals on the revised procedures.

RESPONSE

Procedure AP-3125, "Emergency Plan Classification and Action Level Scheme", has been revised and expanded to address the conditions specified in NUREG-0654, Appendix 1. This procedure is in the process of review by Vermont State officials and is expected to be issued by September 30, 1982. Training of Control Room Staff and other appropriate individuals has been completed.

7. NRC FINDING

Provide a backshift call-in documented method for notifying all appropriate emergency organization personnel down to the working level.

RESPONSE

A backshift call-in method for notifying all appropriate emergency organization personnel down to the working level has been instituted as of June, 1982. The Plant Security Staff has been assigned the responsibility for initiating and documenting the response.

8. NRC FINDING

Revise the assessment procedures to: provide for initially obtaining an estimate of thyroid dose rate when plant conditions indicate that an off-site problem may exist (this should include the criteria used to indicate when to perform this function); provide a method for making initial dose projections if installed Control Room instrumentation is inoperable; provide a criteria for recommending protective actions based on core conditions; and provide Control Room personnel with the

relationship of high-range containment readings to core condition (i.e., gap release or core melt).

#### RESPONSE

The assessment procedures have been revised to: 1) provide for obtaining an estimate of thyroid dose rate when plant conditions indicate that an off-site problem may exist; 2) provide a backup method to the dose projection capability for the condition when Control Room instrumentation is inoperable; 3) provide an off-site protective action based on a total loss of all core cooling capability; and 4) provide EALs which correspond to various degrees of core degradation. Training in these areas has been completed, and the revised procedures will be issued by September 30, 1982.

#### 9. NRC FINDING

Provide new procedures or revise existing ones to include methods to distinguish radiiodine from noble gases for in-plant, site boundary and off-site radiological air sampling. Such procedures should include: trigger levels for purging and counting of charcoal cartridges on a high resolution system and for alternate use of silver zeolite cartridges.

#### RESPONSE

Procedure OP-3510, "Off-Site and Site Boundary Monitoring", has been revised to establish a trigger level for use of silver zeolite as a sample medium instead of charcoal. Procedure OP-3530, "Post-Accident Sampling", has been revised to recognize the use of silver zeolite for stack gas or in-plant sampling purposes. Training in these procedures has been completed and the revised procedures will be issued by September 30, 1982.



10. NRC FINDING

Provide the NRC with a revised Emergency Plan which contains a description of the systems and procedures used to assure that plume EPZ State/local officials have the capability to make a public notification decision within 15 minutes for situations requiring urgent sheltering or evacuation.

RESPONSE

A meeting between NRC, FEMA, the plume EPZ States, and Vermont Yankee personnel was held on January 20, 1982. The purpose of the meeting was to discuss protective action recommendations; to develop assurance that the licensee can make protective action recommendations; and to discuss off-site authority capability to make prompt protective action decisions and activate the Emergency Public Notification System to provide public instruction and direction once a decision has been made. The results of the meeting indicated the issue was to be further evaluated and resolved between NRC, FEMA, and the States. Vermont Yankee will continue to monitor progress in this area and will include more information on this subject in its Emergency Plan when it develops.

VERMONT YANKEE

ATTACHMENT B

RESPONSE TO

EMERGENCY PREPAREDNESS APPRAISAL REPORT

APPENDIX B

"EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS"

1. NRC FINDING

Provide, in the on-site EPC job description, the authority to contact the Plant Manager directly as needed on emergency planning items.

RESPONSE

The EPC has good communication with all levels of on-site emergency response organization. In addition, the EPC maintains direct communications with the NSD office which is responsible for coordinating emergency plan maintenance and off-site authority interface. Additional authority is not required.

2. NRC FINDING

Formalize the provisions for ongoing training of the plant EPC.

RESPONSE

The EPC participates in formal training on an annual basis, therefore, additional provisions for ongoing training of the plant EPC are not considered necessary.

3. NRC FINDING

Provide for notifying appropriate personnel when key emergency functions (e.g., off-site protective action recommendation) are transferred to the Recovery Manager.

RESPONSE

Section 8.3 of the Emergency Plan will be revised to discuss the manner in which emergency functions are transferred to the Site Recovery Manager. Appropriate implementing procedures will be revised accordingly. The revisions are expected to be completed by December 31, 1982.

4. NRC FINDING

Provide a procedure to maintain the Emergency Personnel Assignment List to ensure that personnel are qualified, that the appropriate emergency functions are addressed, and sufficient coverage is maintained.

RESPONSE

The Emergency Personnel Assignment List is required by OP-3506, "Emergency Equipment Readiness Checklist". This list is maintained in an up-to-date status by the Emergency Plan Coordinator.

5. NRC FINDING

Provide specifically for radwaste operations and representation at the State EOCs (if requested) in the emergency organization.

RESPONSE

Auxiliary Operators normally perform radwaste operation, and they are assigned to the Operations Support Center during an emergency situation. Representation at the State EOCs is not normally provided by utility personnel. Should such a request be made, it will be evaluated by the Site Recovery Manager. Note that the plume EPZ States dispatch officials to the Vermont Yankee EOF in an emergency.

6. NRC FINDING

Offer emergency training to the officers of fire, police and ambulance/rescue companies who have mutual aid agreements with licensee's primary support companies.

RESPONSE

An annual training seminar will be offered to mutual aid fire companies and police agencies. Attendance will be voluntary. The Emergency Plan will be revised accordingly.

7. NRC FINDING

Provide for training workers on major emergency procedure and equipment changes to include hands-on training if applicable.

RESPONSE

OP-3712, "Emergency Plan Training", procedure will be revised to reflect the above consideration. The revision is expected to be completed by December 31, 1982.

8. NRC FINDING

Provide additional training to Emergency Directors/Shift Supervisors in classifying accidents and in initiating dose calculations (i.e., either doing the calculations themselves or delegating to an HP Tech. or STA).

RESPONSE

Additional training has been provided to the Emergency Directors/Shift Supervisors in classifying accidents in accordance with the commitment established in conjunction with Appendix A, Item 7.

Emergency Directors/Shift Supervisors have also been provided additional instruction concerning the dose projection methodology.

9. NRC FINDING

Provide additional training to individuals who perform dose calculations including use of the off-site dose rate nomogram and TI-59 calculator.

RESPONSE

Sessions providing additional training to emergency response staff in the area of dose projection techniques have been completed.

10. NRC FINDING

Provide additional training to personnel who would perform post-accident sampling/analysis and main stack sampling/analysis to include typical exposure rates that may be encountered during the above procedures and in methods for counting high-level samples using the GeLi System.

RESPONSE

Additional instruction will be provided to those emergency assistance personnel responsible for post-accident sampling analysis.

11. NRC FINDING

Review the responsibilities of the Radiological Assistant and determine the need for delegating some of the individual's duties during an emergency.

RESPONSE

The Emergency Tag Board assignments will be revised to require assistance personnel whose major functions are to maintain records and update status boards. These assistance personnel will alleviate a major portion of the Radiological Assistant's time commitment.

12. NRC FINDING

Assure that records are kept on training of off-site medical personnel.

RESPONSE

Plant procedures will be revised to assure that records are kept on training of off-site medical personnel. The revision is expected to be completed by December 31, 1982.

13. NRC FINDING

Provide thyroid dose nomograms in the Control Room.

RESPONSE

A thyroid dose nomogram is available in the Control Room. Projection of off-site thyroid doses will be performed when actual stack gas or field samples have been drawn and analyzed. OP-3513 describes the method for projecting off-site thyroid dose as a function of actual sample results.

14. NRC FINDING

Complete the study evaluating the need for HEPA and charcoal filtration of the Control Room Ventilation System and document the conclusions to the Nuclear Regulatory Commission.

RESPONSE

A study has been completed and the findings have been submitted to the NRC in a letter to the NRC, dated January 12, 1981 (FVY 81-8).

15. NRC FINDING

Provide designated office space for each major TSC functional subgroup, and take steps to reduce crowding in the TSC Communications Center.

RESPONSE

Sufficient office space for each major TSC functional subgroup is presently provided. Emphasis concerning the aspect of crowd reduction in the TSC Communications Center will be provided during upcoming training sessions.

16. NRC FINDING

Designate and equip an alternate EOF sufficiently distant from the site that it would not be rendered uninhabitable by shifting meteorology conditions (following review of the proposed AEOF location by NRC).

RESPONSE

An alternate EOF will be established at the Vermont Yankee Corporate Office Building which is located approximately 8.7 miles north of the plant.

17. NRC FINDING

Establish a location for the Eberline SAM-II air sample counter such that it need not be unplugged, thereby eliminating the required warm-up/stabilization time.

RESPONSE

The SAM-II will be located in the Sample Analysis area of the EOF. This will allow continuous operation, thereby eliminating the required warm-up/stabilization time.

18. NRC FINDING

Provide adequate shielding for transporting high activity reactor coolant samples to the analysis laboratory.

RESPONSE

OP-3530, "Post-Accident Sampling", specifies the use of portable shields to transport the reactor coolant samples to the analysis laboratory. The procedure also specifies the use of a dilution technique to produce manageable sample levels.



19. NRC FINDING

Determine the maximum reactor coolant sample concentrations that could be analyzed under worst case accident conditions.

RESPONSE

The maximum reactor coolant sample concentration that could be analyzed with the present system has been determined to be 4.7 mCi/cc.

20. NRC FINDING

Determine the maximum containment sample concentrations that could be analyzed under worst case accident conditions.

RESPONSE

The maximum containment sample concentration that can be analyzed has been determined to be 36 mCi/cc with the present system.

21. NRC FINDING

Develop plans and procedures for post-accident sampling and analysis of liquid from systems known to be contaminated or normally contaminated with radioactive material. The procedure should contain the following guidance: whether the liquids can or should be transferred to other storage facilities, processed or discharged; precautions to be taken during sampling; and immediate actions required to evaluate the radiation levels of the liquids.

RESPONSE

OP-3530 adequately addresses all considerations for post-accident sampling and subsequent analysis of high level radioactive material. In the event that present sample storage area becomes burdened, an interim storage facility would be made available in some secure location such as

the Radwaste Cask Handling Room. Detailed procedures would be developed at that time by the Recovery Organization.

22. NRC FINDING

Provide an assembly area outside of the site area that could be used under conditions requiring immediate evacuation of the nearby site and as a reassembly area for re-entry operations.

RESPONSE

The Governor Hunt House (the primary EOF/RC) serves as an assembly area under conditions requiring immediate evacuation. Vernon Town Hall provides overflow capability for evacuating personnel. Additional capability is available at the VY Corporate Office in Brattleboro. All three sites could be used as a reassembly area for re-entry operations.

23. NRC FINDING

Provide for showering contaminated persons at the alternate EOF and for liquid waste disposal.

RESPONSE

The Alternate EOF plans for Vermont Yankee are changing with the recent setup at a new Corporate Office in Brattleboro. Appropriate arrangements to use this new facility as an AEOF will be established.

24. NRC FINDING

Provide copies of decontamination procedures at each decontamination location.

RESPONSE

The decontamination procedures will be included in each of the Emergency Plan Implementing Procedure Manuals located at each decontamination station.

25. NRC FINDING

Conduct a survey to identify local resources that could be used to support the expanded emergency organization that would respond to an emergency.

RESPONSE

Sufficient information from plant sources (e.g., Purchasing Department and/or Public Relations Staff) presently exist to identify local resources that could be used to support an expanded emergency organization.

26. NRC FINDING

Provide back-up instruments at the EOF for the off-site monitoring teams.

RESPONSE

The instruments at the EOF can be augmented with supplies from three sources: 1) in-plant supplies, 2) the ESC emergency kits, and/or 3) equipment acquired through the Yankee Mutual Assistance Plan; therefore, no additional instrumentation beyond that already available at the EOF is deemed necessary.

27. NRC FINDING

Ensure that adequate procedures for calibration of the high-range stack and containment monitors are in place prior to the next scheduled calibration.

RESPONSE

Calibration procedures for the high-range stack and containment monitors are under development. These procedures will be in place prior to the next calibration scheduled for the March, 1983 refueling outage.

29. NRC FINDING

Improve the display of the temperature difference parameter in the Control Room. The size and scale of the recorder was insufficient to determine differences in stability class.

RESPONSE

The instrumentation referred to by the finding is the back-up meteorological tower information and, as such, its readout is considered adequate to assess meteorological conditions.

29. NRC FINDING

Provide for a dedicated system of communications among the CR, TSC, EOF and OSC.

RESPONSE

A sophisticated communication system is being installed among the centers which will provide these emergency centers with a greatly enhanced communication capability. Plans are underway for an upgraded telephone system to service the plant. It is anticipated this upgrade will include an intercom feature for emergency center communication purposes. In the meantime, the plant gaitronics system will continue to be useful for emergency center communication.

30. NRC FINDING

Ensure that action will be completed on the pager system to correct deficiencies identified during backshift tests.

RESPONSE

A new antenna location has been established in order to increase the range of the pager system. An additional pager service has been contracted for the Massachusetts area to correct deficiencies identified in that area during the communication drills.

31. NRC FINDING

Relocate the emergency communication equipment in the Control Room such that it will not interfere with Control Room immediate actions.

RESPONSE

The new sophisticated communication system is being installed in the Control Room which will eliminate interference with Control Room operator immediate actions.

32. NRC FINDING

Review the emergency procedures to ensure that they contain sufficient precautions and caution statements.

RESPONSE

Plant procedures have been revised to include additional emphasis as to radiation protection concerns.

33. NRC FINDING

Review the Control Room emergency alarm, abnormal occurrence procedures to ensure that all references to other procedures are correct.

RESPONSE

Control Room emergency procedures have been revised to ensure that all references to other procedures are correct.

34. NRC FINDING

Review the Control Room emergency alarm, abnormal occurrence procedures to identify those procedures where direct event classifications can be made and to ensure that the direct classifications are correct.

RESPONSE

The emergency alarm procedures are symptom-oriented whereas the emergency classification procedure and NUREG-0654 guidance are event-oriented. The two philosophies differ in intent and, therefore, make it unwise to establish direct classification in the alarm procedure. Event classification in an emergency category will continue to be accomplished by the implementation of the emergency classification procedure.

35. NRC FINDING

Reference the procedure containing the emergency phone numbers or provide the appropriate numbers at the steps in the implementing procedures requiring their use.

RESPONSE

The emergency plan implementing procedures will be revised to reference the appropriate communication procedure. The revisions are expected to be completed by December 31, 1982.

36. NRC FINDING

Provide information in the off-site monitoring procedure for obtaining a vehicle for use during site boundary and off-site monitoring.

RESPONSE

OP-3510, "Off-Site and Site Boundary Monitoring", has been modified to direct the team to obtain a vehicle from the Security Force.

37. NRC FINDING

Provide instructions in the off-site monitoring procedure for determining when the monitoring team is located in the plume (GM open - closed window).

RESPONSE

Elevated radiation levels observed in the field will prompt sampling. Subsequent detection of sample activity levels provides sufficient evidence of plume location.

38. NRC FINDING

Develop a simple checklist of radiation protection concerns and precautions for in-plant survey teams under post-accident conditions. Such a checklist could be appended to an existing procedure or issued as a new in-plant survey procedure.

RESPONSE

A simple checklist addressing these concerns will be added to OP-3507, "Emergency Radiation Exposure Control".

39. NRC FINDING

Provide high-range (0-25R, 1-100R) pocket dosimeters for special monitoring situations.

RESPONSE

0-100R high-range pocket dosimeters will be purchased to supplement present emergency supplies.

40. NRC FINDING

Establish provisions for rapidly supplementing the on-site supply of silver zeolite cartridges.

RESPONSE

Additional silver zeolite cartridges, beyond the supply already available, can be obtained through Yankee Mutual Assistance Plan arrangements.

41. NRC FINDING

Add the Control Room to the list of areas requiring radiological habitability assessment contained in Appendix VI to Procedures OP-3501, 3502, and 3503.

RESPONSE

An appropriate statement addressing this concern will be added to the implementing procedures. The revisions are expected to be completed by December 31, 1982.



42. NRC FINDING

Revise Procedure OP-3530 "Post-Accident Sampling" to include the following items:

- Table of Contents and Listing of Equipment;
- Precautions concerning expected dose rate using NUREG-0737 source terms;
- Data sheets and provisions for reporting and returning all original data sheets to the appropriate emergency organizational elements; and
- Reference to Procedure DP-2630 to perform conductivity measurements on post-accident reactor coolant samples.

RESPONSE

OP-3530, "Post Accident Sampling" has been revised to reflect the above considerations.

43. NRC FINDING

Address the assignment of duties for RMP samples to be collected during an emergency, and reference applicable Environmental Laboratory procedures in station Procedure OP-3509.

RESPONSE

OP-3509 will be revised to reflect that REMP samples will be collected in accordance with OP-4501, "Environmental Radiation Surveillance Program", and OP-4510, "Environmental Surveillance". The revision is expected to be completed by December 31, 1982.

44. NRC FINDING

Establish criteria for distribution of potassium iodine for thyroid blocking.

RESPONSE

Appropriate implementing procedures will be modified to establish criteria for the distribution of potassium iodine for thyroid blocking. The revisions are expected to be completed by December 31, 1982.

45. NRC FINDING

Develop a procedure for immediate evacuation to a predetermined location and to provide a reassembly area to be used by personnel reporting to the site if conditions warrant. This should include a revision to the call-up procedures to allow directing off duty augmentation personnel to this location.

RESPONSE

The primary EOF/RC facility will continue to serve as the primary evacuation, reassembly, and off-duty augmentation personnel assembly point. It is not possible to require evacuation of emergency centers before they are activated and determined to be uninhabitable. The procedures presently identify a phased evacuation process which properly integrates the use of the Alternate EOF.

46. NRC FINDING

Provide forms or a log at the EOF and Alternate EOF for recording names of contaminated individuals, contamination levels, decon method used and results of the decon.

RESPONSE

A log will be provided for the personnel monitoring team's use in recording the names of contaminated individuals, contamination levels, decon method used, and the results of the decon process. The Tag Board assignment for the personnel monitoring team will be revised to reflect its use.

47. NRC FINDING

Establish contamination action levels which would require further assessment (i.e., whole body counting, urinalysis).

RESPONSE

Contamination action level criteria will be established which specify when further stages of internal dose assessment are necessary. This criteria will be provided in RP-0520. The revision is expected to be completed by December 31, 1982.

48. NRC FINDING

Provide additional survey instruments at the EOF dedicated for personnel monitoring or make provisions for supplementing supplies during an emergency.

RESPONSE

The response to this item is the same as the response to Appendix B, Item 26.

49. NRC FINDING

Make the emergency exposure criteria for emergency workers consistent with the EPA Emergency Worker and Lifesaving Activity Protective Action Guides given in EPA-520/1-75-001.

RESPONSE

The basis for the current emergency exposure criteria is derived from NCRP 39 guidance. This criteria is acceptable to the plant staff and, therefore, the present exposure criteria will remain as currently specified.

50. NRC FINDING

Develop a repair/corrective action procedure for use by OSC, TSC and EOF personnel which would identify items necessary for consideration, planning, and briefing of teams prior to task performance.

RESPONSE

It would be premature to specify repair/corrective action procedures. The Site Recovery Manager and his staff have been charged with the responsibility of evaluating and identifying appropriate repair/corrective actions required to restore the plant to safe conditions. Therefore, the development of repair/corrective action procedures would be considered on an as-needed basis on the basis of actual emergency conditions.

51. NRC FINDING

Provide for backshift exercises, and for a backshift test of the off-duty emergency organization call-in system.

RESPONSE

The 1982 annual Emergency Plan exercise at Vermont Yankee was initiated during a backshift. Backshift drills and exercises have been and will continue to be considered in plant emergency planning. It should be noted emergency plan exercises involve many off-site organizations in addition to the plant. Coordination with these organizations on the timing at exercises is required, which prevents the plant from unilaterally committing to backshift exercises.

52. NRC FINDING

Provide for additional communications test in accordance with 10CFR50, Appendix E, III (E)(9).

RESPONSE

It is our understanding that we meet the intent of 10CFR50, Appendix E, III(E)(a) by communicating with the NRC using the Emergency Notification System.

53. NRC FINDING

As part of the audit process, observe drills and exercises, conduct follow-up to ensure that corrective actions have been actually performed and interview/walk-through personnel to check the adequacy of training.

RESPONSE

Yankee Quality Assurance Program presently provides a comprehensive and objective audit program to evaluate all emergency preparedness areas. Commencing with the 1982 emergency preparedness audit cycle, the audit program will include on a sample basis:

- 1) Types of emergency equipment and supplies checked by auditors;
- 2) Nature and character of verification performed on corrective actions resulting from drills and exercises; and
- 3) Observation of drills or exercises will be included as part of the audit program. These observations will be performed by individuals with no immediate responsibility for the emergency preparedness program.

54. NRC FINDING

Review the Emergency Plan and Procedures to ensure compatibility with the anticipated USNRC Region I response to the site during an emergency.

RESPONSE

The Vermont Yankee Emergency Plan and Procedures considers anticipated USNRC Region I response in all planning arrangements.

55. NRC FINDING

Expand the public information mailout/posters to include sheltering information, improvised respiratory protection, and the forms of releases and their relationship to protective actions.

RESPONSE

We are restricted as to the informational content of the public information brochures since State approval must be obtained prior to any distribution.