

TO: NRC DCC

VERMONT YANKEE CONTROLLED DOCUMENT TRANSMITTAL FORM

License No DPR-28
Docket No 50-271

SECTION 1

DOCUMENT TITLE: IMPLEMENTING PROCEDURES TO THE E-PLAN

COPY NUMBER: 54

CHANGE NUMBER: #187

ISSUE DATE: September 5, 2000

INSTRUCTIONS:

- a. Attached is an authorized controlled copy to the above listed document for retention as your assigned copy.
- b. Review the revised material.
- c. Incorporate new change into the controlled document by document issue date, if applicable.
- d. Ensure that those who use the document are aware of the change.
- e. Destroy all superseded pages.
- f. Destroy obsolete forms and insert new forms into the files.
- g. Sign and date this form and return to the Executive Secretary (ES) or Document Control Center (DCC).
- h. Complete appropriate change information on VY Controlled Document Record of Changes.

TRANSMITTED BY: *Duan McCue*

ES or DCC Signature

AFTER COMPLYING WITH THE ABOVE
INSTRUCTIONS, PLEASE RETURN TO THE ES OR
DCC WITHIN 10 DAYS OF THE ISSUE DATE.

SECTION 2

The undersigned acknowledges completion of the preceding instructions.

Signature of Recipient: _____ Date: _____

A045

Eplan Implementing Plant Procedures

To: Eplan Implementing Procedure Controlled Set Holders

From: Diane McCue

Date: 09/05/00

Re: VY Eplan Implementing Procedure Change #187, Instruction Sheet

LPC's:

The following LPC's should be incorporated into the appropriate procedures:

Proc/Rev #

LPC #

Procedure Title

OP 3505/23

1, 2

Emergency Preparedness Exer/Drills

OP 3712/15

1

Emergency Plan Training

LPC's

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3505

REVISION 23

EMERGENCY PREPAREDNESS EXERCISES AND DRILLS

USE CLASSIFICATION: **INFORMATION**, except for Appendix A,
which is classified as **CONTINUOUS**

LPC No.	Effective Date	Affected Pages
1		3-7 of 15; VYOPF 3505.02
2	08/24/00	12 & 13 of 15

Implementation Statement: N/A

Issue Date: 05/25/00

PURPOSE

This procedure provides the criteria for testing and evaluating the adequacy of emergency facilities, equipment, procedures, communication channels, actions of emergency response personnel and coordination between off-site authorities and the plant.

DISCUSSION

An exercise tests the execution of the overall plant emergency preparedness and the integration of the preparedness with off-site authorities.

A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular emergency response function. Certain drills are conducted as a component of an exercise.

Emergency Preparedness Exercises and Drills are conducted as specified in this procedure to test individual tasks and the overall plant readiness capability to execute the Emergency Plan and its implementing procedures. It outlines the process by which exercises and drills are developed and evaluated.

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An Exercise Coordinator, who is appointed by the Director of Human Resources & Public Affairs (or designated alternate), plans the Emergency Preparedness Exercise/Drill. The Exercise Coordinator may assist the plant personnel in preparing and conducting drills, when requested; otherwise, drill preparation and conduct are by plant personnel.

Plant management has the option to include a fire drill and/or a medical drill during the Emergency Preparedness Exercise or any combination thereof. Plant management has the option to conduct drills, with or without off-site agencies, designed to test the plant's readiness capability.

All weaknesses and deficiencies identified by controllers, are documented as specified in this procedure. Off-site agencies are contacted to inform them of the proposed exercise/date and to determine their degree of participation.

ATTACHMENTS

- | | | |
|----|---------------|--|
| 1. | Table 1 | Generic Reminder List of Scenario-Related Items for the Exercise/Drill Coordinator |
| 2. | Figure 1 | Simulator/Plant Gai-Tronics Link |
| 3. | VYOPF 3505.01 | Emergency Preparedness Exercise/Drill Planning Form |
| 4. | VYOPF 3505.02 | Emergency Exercise/Drill Controller's Evaluation Form |
| 5. | VYOPF 3505.03 | Medical Drill Planning Form |
| 6. | VYOPF 3505.04 | Deleted |
| 7. | VYOPF 3505.05 | Health Physics Drill Planning Form |
| 8. | VYOPF 3505.06 | Off-Site Participation Fire Drill Planning Form |
| 9. | Appendix A | Implementation of the Simulator/Plant Gai-Tronics Link |

REFERENCES AND COMMITMENTS

1. Technical Specifications and Site Documents
 - a. Vermont Yankee Emergency Plan
2. Codes, Standards and Regulations
 - a. 10CFR50.47, 10CFR50.54(q), and 10CFR50 Appendix E
3. Commitments
 - a. EPEX93SC3CPE1
 - b. EPEX93SC2CPE1
 - c. INF89046
 - d. AUDITRPT 2000-1407_00 (VYOPF 3505.02)
4. Supplemental References
 - a. AP 0009, Event Reports
 - b. AP 0028, Commitment Tracking
 - c. OP 3506, Emergency Equipment Readiness Check
 - d. OP 3531, Emergency Call-In Method
 - e. AP 3700, Fire Training
 - f. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

PRECAUTIONS

1. The initiating announcement and subsequent communications associated with drills and the emergency exercises include the words "THIS IS A DRILL".
2. During a simulated accident, no action to materially alter the plant operating conditions are permitted unless previously authorized in writing by the Plant Manager.
3. An emergency exercise is terminated by the Shift Supervisor or higher management at any time plant operational conditions warrant such action.
4. Proper radiation protection controls are maintained and adhered to during drills and exercises.

PREREQUISITES

1. Prior to establishing the exercise/drill date for the Emergency Preparedness Exercise/Drill, the Emergency Plan Supervisor obtains the approval of Vermont Yankee Management.
2. Before initiating a full or partial participation Emergency Preparedness Exercise/Drill, all applicable off-site agencies are made cognizant by the Emergency Plan Supervisor of the intended exercise/drill and a determination made as to their degree of participation. (Refer to VYOPF 3505.01 Emergency Preparedness Exercise/Drill Planning Form.)

3. Before initiating a full or partial participation Emergency Preparedness Exercise/Drill, the Emergency Plan Supervisor verifies the contents of those letters of agreement (which are maintained in Appendix E of the Vermont Yankee Emergency Plan) are still valid (refer to VYOPF 3505.01 Emergency Preparedness Exercise/Drill Planning Form).

PROCEDURE

A. Emergency Preparedness Exercise/Drill

NOTE

A full participation exercise shall be conducted every two years. At least one drill involving a combination of some of the principal functional areas of emergency response shall be conducted in the interval between biennial exercises. State and off-site agencies may participate in drills.

1. Working Exercise/Drill Groups

- a. The following working groups exist solely to support the planning, conduct, and evaluation of the exercise/drill:
 - 1) Exercise/Drill Planning Committee
 - a) This group has policy level, broad oversight, and decision-making responsibilities associated with the annual exercise/drill, and is made up of the following members:
 1. Vice President, Vermont Yankee
 2. Director of Safety & Regulatory Affairs
 3. Director of Human Resources & Public Affairs
 4. Plant Manager
 5. Exercise Coordinator
 6. Emergency Plan Supervisor
 7. Training Superintendent
 - b) Members of this group have the authority to commit resources from their organizations. This group does not have access to scenario information other than objectives and other information available to participants, such as extent of play.
 - c) This group may delegate responsibilities as defined in Section 2 of this procedure to other individuals as warranted.

d) This group approves the following:

1. Exercise date (if applicable)
2. Training drill date
3. Exercise objectives (if applicable)
4. Training drill objectives
5. Exercise scope (if applicable)
6. Integration of VY and off-site objectives and activities
7. Exercise Coordinator

e) To ensure that the Exercise/Drill Coordinator is fully cognizant of and has the time to deal with, previous and upcoming exercise issues, the Director of Human Resources & Public Affairs appoints, within 3 months following an exercise, an Exercise/Drill Coordinator (with previous exercise experience) for the next exercise, and an Exercise/Drill Coordinator designate for the following exercise. (EPEX93SC3CPE1)

2) Exercise/Drill Planning and Support Group

a) This group, led by the Exercise/Drill Coordinator, consists of individuals made available by the Exercise Planning Committee. The responsibilities of the group include the following:

1. Establish and maintain schedules and punchlists.
2. Interface with off-site groups for preparation and conduct of the exercise/drill.
3. Prepare training for players and controllers.
4. Assemble exercise/drill package.
5. Brief and train NRC officials, as necessary.
6. Conduct critiques.

3) Scenario Development Group

a) This group led by the Exercise/Drill Coordinator, may consist of individuals selected from the following areas of expertise:

1. Operations
2. Reactor Engineering
3. Radiation Protection
4. Chemistry
5. Simulator
6. Security
7. Contracted support, as necessary

b) This group has the following responsibilities:

1. Prepares the scenario.
2. Prepares radiological, plume, and operational data.
3. Develops mini-scenarios and related mock-ups.
4. Performs tests on simulator.
5. Determines plant activities.

4) Exercise/Drill Controller Group

a) This group consists of individuals who are made available by the Exercise Planning Committee and who, under the direction of the Exercise/Drill Coordinator, initiate and direct the events of the scenario and evaluate VY's performance.

2. Individual Responsibilities

a. Director of Human Resources & Public Affairs

- 1) The Director of Human Resources & Public Affairs (or designated alternate) has overall responsibility for the Emergency Preparedness Program which includes the Emergency Preparedness Exercise/Drill.

EMERGENCY EXERCISE/DRILL
CONTROLLER'S EVALUATION FORM

Controller's Name: _____ Exercise/Drill Date: _____

Exercise/Drill Title: _____

Controller's Location: _____

Observed:	<u>Player</u>	<u>Function</u>
	_____	_____
	_____	_____
	_____	_____

Overall Performance and Observations: (Include the proper and effective use of procedures, equipment and personnel) _____

Comments and Recommendations (Specific): _____

Potential Weaknesses: _____

NOTE

Use additional pages as required.

| Print Name: _____

Signature: _____

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4 Disposition:

Emergency Plan Review: _____ / _____
| (print/sign) Date

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d. Emergency Plan Liaison

- 1) The Emergency Plan Liaison provides assistance to the off-site response organizations in planning and preparations for the exercise/drill.
 - a) Assist in determining the off-site objectives for the exercise/drill for each state through active liaison with the States, and FEMA.
 - b) Contact appropriate off-site agencies to determine their degree of participation. Refer to the listing of off-site agencies on the Emergency Preparedness Exercise/Drill Planning Form.
 - c) Ensure that all Letters of Agreement stipulated in Appendix E of the Vermont Yankee Emergency Plan are current, by reviewing findings documented on the Emergency Preparedness Exercise/Drill Planning Form (VYOPF 3505.01). If not current, make necessary update action.

B. Drills

1. Medical Drills

- a. Conduct at least one drill annually to evaluate the training of the plant's medical response team and off-site medical response personnel. This drill may be performed as part of the required annual emergency preparedness exercise, fire drill, or as a stand alone Medical Drill.
- b. The Emergency Plan Supervisor, and Emergency Plan Liaison, develop a drill scenario. Utilize the Medical Drill Planning Form, VYOPF 3505.03, for Medical Drill planning and approval.
- c. The Emergency Plan Liaison contacts off-site medical response personnel (ambulance and hospital) to request their participation in the drill.
- d. The Emergency Plan Liaison contacts the Vernon Police to notify them of the date and time of the drill.
- e. Prior to the drill, the Emergency Plan Liaison notifies the following:
 - 1) Director of Public Affairs
 - 2) Radiation Protection Manager
 - 3) Operations Manager
 - 4) Security Manager
 - 5) NRC Resident Inspector
 - 6) Safety Coordinator

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- f. The Emergency Plan Liaison briefs controllers on the drill and issues Emergency Exercise/Drill Controller's Evaluation Form, VYOPF 3505.02.
- g. The Emergency Plan Liaison conducts a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.
- h. All Emergency Exercise/Drill Controller's Evaluation Forms are collected by the Emergency Plan Liaison at the conclusion of the critique.

2. Health Physics Drills

- a. A drill is conducted semi-annually which involves response to and analysis of, simulated elevated airborne and liquid samples, and direct radiation measurements in the plant. The semi-annual Health Physics Drills are conducted as follows:
 - 1) One of the drills may be performed as part of the required Emergency Preparedness Exercise/Drill.
 - 2) One of the drills is performed separately, and following the guidelines outlined in this procedure.
 - 3) One of the drills should include use of the post-accident sampling system.

NOTE

Time frame to conduct the drill should allow enough time for obtaining and counting planned drill chemistry samples.

- b. In conjunction with the Chemistry Manager and the Radiation Protection Manager, the EPS directs the development of a drill scenario utilizing the Health Physics Drill Planning Form, VYOPF 3505.05.
- c. The EPS briefs controllers on the drill and distributes Emergency Exercise/Drill Controller's Evaluation Form, VYOPF 3505.02.
- d. The EPS conducts a critique for controllers and participants to present their observations and comments. All weaknesses and deficiencies are documented and resolved as outlined in Section C.

3. Radiological Monitoring Drills

- a. At least one drill is conducted each year to evaluate on-site and off-site collection and analysis of airborne sample media. This drill may be performed as part of the required Emergency Preparedness Exercise/Drill.

VERMONT YANKEE NUCLEAR POWER STATION

OPERATING PROCEDURE

OP 3712

REVISION 15

EMERGENCY PLAN TRAINING

USE CLASSIFICATION: INFORMATION

LPC No.	Effective Date	Affected Pages
1	08/24/00	1, 2 & 3 of 5

Implementation Statement: N/A

Issue Date: 08/27/99

Dept. Mgr.	_____	Proc. No.	<u>OP 3712</u>
PORC	_____	Rev. No.	<u>15</u>
Plant Mgr.	_____	Issue Date	<u>08/27/99</u>
Dir. of Ops.	_____	Review Date	<u>08/27/01</u>

EMERGENCY PLAN TRAINING

PURPOSE

To specify the Emergency Plan training requirements for the Vermont Yankee staff and supporting contractors and to outline the training provided for local medical support personnel, local fire department, the news media, and state and local government emergency assistance personnel in support of the emergency response.

The use classification of this procedure is **Information Use**.

DISCUSSION

The Vermont Yankee staff and supporting contractors annually receive a general overview training module covering the Emergency Plan and the Implementing Procedures to the Emergency Plan as part of GET. Additionally, personnel receive position specific training to qualify them for their respective assignments during an Emergency. These position specific training modules and assignments to them are specified by the Emergency Assistance Personnel List which is formulated by the Emergency Plan Coordinator.

The Vermont Yankee Emergency Plan Training is based upon Appendix E to 10CFR50, Vermont Yankee's Emergency Plan, and the Implementing Procedures to the Emergency Plan. It is, where applicable, performance-based, personnel-specific training and is assigned in accordance with the Emergency Assistance Personnel List (EAPL). The Emergency Plan Coordinator maintains the Emergency Assistance Personnel List with assistance from the Training Department per AP 3532, Emergency Preparedness Organization.

On a quarterly basis, the Emergency Plan Coordinator will publish an updated list of Emergency Assistant Personnel training status. The list will show who has completed emergency response training for the updating of the Emergency Assistant Personnel List. (MOO ID 8714)

I
LPC 1 The Emergency Assistance Personnel List assignments will be audited annually by the Emergency Plan Coordinator in conjunction with the Director of Human Resources and Public Affairs and the Plant Manager to ensure continued concurrence with emergency response assignments (MOO ID 8714).

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LPC 1 The Emergency Plan Supervisor, in conjunction with the Technical Training Manager, will evaluate changes to the Emergency Plan and the Implementing Procedures to the Emergency Plan to determine if the change or changes require additional training (MOO ID 8714). Similarly, the Emergency Plan Supervisor and the Technical Training Manager review and approve applicable Emergency Plan training materials for use (INS8707CPE2).

Formal critiques will be held of all training exercises. Identified weaknesses and/or deficiencies requiring further corrective action will be forwarded to the Emergency Plan Supervisor for resolution in accordance with OP 3505, Section C. (MOO ID 8914)

The following sections are included in this procedure:

<u>Title</u>	<u>Page</u>
I. EMERGENCY RESPONSE TRAINING	3
I.A News Media Center	3
I.B Medical Response Team	3
I.C Controller Training	4
II. SPECIAL EMERGENCY RESPONSE TRAINING GROUPS	4
II.A Local Medical Support Personnel	4
II.B State and Local Governments	5
II.C Local Fire Department	5

REFERENCES

1. Technical Specifications
 - a. None
2. Administrative Limits
 - a. On a quarterly basis, the Emergency Plan Coordinator will publish an updated list of Emergency Assistant Personnel training status. The list will show who has completed emergency response training for the updating of the Emergency Assistant Personnel List. (MOO ID 8714)
 - b. The Emergency Assistance Personnel List assignments will be audited annually by the Emergency Plan Coordinator in conjunction with the Director of Human Resources & Public Affairs and the Plant Manager to ensure continued concurrence with emergency response assignments. (MOO ID 8714)
3. Other
 - a. Vermont Yankee Emergency Plan
 - b. Vermont Yankee Implementing Procedures to the Emergency Plan
 - c. Appendix E, 10CFR50
 - d. Training Department Directives
 - e. Emergency Plan Training Program Description
 - f. AP 0700, Vermont Yankee Staff Training
 - g. AP 0840, Medical Response Team Training
 - h. OP 3505, Emergency Preparedness Exercises and Drills
 - i. OP 3510, Off-Site and Site Boundary Monitoring
 - j. AP 3532, Emergency Preparedness Organization
 - k. AP 6807, Collection, Temporary Storage and Retrieval of QA Records

RESPONSIBILITIES

1. The Emergency Plan Supervisor has the overall responsibility to ensure all training is completed in accordance with Emergency Plan Training Program Description (EPTPD). (SSCA0983, IFI932401)
- ILPC 1 2. The Emergency Plan Liaisons are responsible for coordinating the training of the local medical support personnel, state and local government personnel, and personnel from the Vernon fire department and other Southwestern Fire Mutual Aid District fire departments within the VY 10 mile EPZ. The Training Department will, upon request, assist in this effort (Section II.A,B,C of this procedure)(SSCA 0539 and SSCA 0618).
- ILPC 1 3. The Director of Human Resources and Public Affairs is responsible for annual training of the news media and News Media Center Staff. Training Department will, upon request, assist in this effort (Section I.A of this procedure).
- ILPC 1 4. The Training Department is responsible for completion of training in accordance with the EPTPD under the direction of the Technical Training Manager.
5. The Vermont Yankee Emergency Plan Training is based upon Appendix E to 10CFR50, Vermont Yankee's Emergency Plan, and the Implementing Procedures to the Emergency Plan. It is, where applicable, performance-based, personnel-specific training assigned in accordance with the Emergency Assistance Personnel List (EAPL). The Emergency Plan Coordinator maintains the Emergency Assistance Personnel List with assistance from the Training Department per AP 3532, Emergency Preparedness Organization.

PROCEDURE

Emergency Plan training will be provided for the following groups.

I. EMERGENCY RESPONSE TRAINING

The initial position specific emergency response training is defined in the Emergency Plan Training Program Description (EPTPD) for all but the following personnel.

The Emergency Response training is required for initial qualification and is the basis for required annual (calendar year) refresher/continuing training.

A. News Media

ILPC 1 The Director of Human Resources and Public Affairs coordinates a training program to acquaint local news media personnel with the emergency plans, points of contact for release of information, location of News Media Centers, and update on public information packets sent to the public. This training is conducted annually.

B. Medical Response Team

Medical Response Team training requirements are specified in AP 0840.