

7/22/2014  
79FR42539

# PUBLIC SUBMISSION

(2)

**As of:** August 22, 2014  
**Received:** August 21, 2014  
**Status:** Pending\_Post  
**Tracking No.** 1jy-8dxa-b0id  
**Comments Due:** August 21, 2014  
**Submission Type:** API

**Docket:** NRC-2014-0169

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

**Comment On:** NRC-2014-0169-0001

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

**Document:** NRC-2014-0169-DRAFT-0002

Comment on FR Doc # 2014-17257

## Submitter Information

**Name:** Anthony Leshinskie

**Address:**

State of Vermont, Public Service Department  
 112 State Street  
 Montpelier, VT, 05620-2601

**Email:** Anthony.Leshinskie@state.vt.us

**Organization:** State of Vermont

**Government Agency Type:** State

**Government Agency:** Public Service Department

RECEIVED

2014 AUG 22 PM 2:07

RULES AND DIRECTIVES  
 BRANCH  
 INFO

## General Comment

The attached comments were received by the Vermont Public Service Department and are submitted on behalf of the Vermont Department of Public Safety, Division of Emergency Management and Homeland Security regarding the Vermont Yankee License Amendment Request included in NRC-2014-0169 (published in the Federal Register on July 21, 2014).

## Attachments

ENVY Bvy 14-018 Public Period Comments PSD-EMHS to NRC

**SUNSI Review Complete**

**Template = ADM - 013**

**E-RIDS = ADM-03**

**Add=** M. Persderson (MAHA)  
 D. Broadus (DAB)



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

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

August 21, 2014

Docket ID NRC-2014-0169

Comments received by the Vermont Public Service Department regarding the following License Amendment Request published in the Federal Register on July 22, 2014:

ENTERGY NUCLEAR VERMONT YANKEE, LLC & ENTERGY NUCLEAR OPERATIONS, INC.,  
DOCKET NO. 50-271, VERMONT YANKEE NUCLEAR POWER STATION, VERNON, VT.

*Date of amendment request:* March 24, 2014. A publicly available version is in ADAMS under Accession No. ML14085A257.

*Description of amendment request:* The proposed amendment would revise the site emergency plan for the permanently defueled condition to reflect changes in the on-shift staffing and Emergency Response Organization staffing.

Gentlemen:

The Vermont Public Service Department has received the following comments regarding the subject Vermont Yankee License Amendment Request (LAR) available publically via ADAMS Accession No. ML14085A257. The comments were created by staff at the Vermont Department of Public Safety, Division of Emergency Management and Homeland Security on behalf of the State of Vermont. The comments were compiled by the Vermont State Nuclear Engineer and Decommissioning Coordinator and are respectfully submitted for Nuclear Regulatory Commission consideration as it examines the merits of this LAR as part of the Safety Evaluation Report process for Vermont Yankee.

The Vermont Division of Emergency Management and Homeland Security comments on this LAR are as follows:

The Vermont Division of Emergency Management and Homeland Security (DEMHS) and the State Emergency Operations Center (SEOC) interface with the Vermont Yankee (VY) Emergency Response Organization (ERO) during an incident at the plant. The SEOC personnel specifically communicate with members of the Joint Information Center (JIC) and the Emergency Operations Facility (EOF) in order to maintain situational awareness of the evolving issues at the plant and how plant personnel are applying mitigation measures.

In the subject March 24, 2014 submission to the NRC, VY outlined 27 positions within the ERO that will be eliminated post-shutdown (post- shutdown, plus a sixty day implementation period). Of those 27 positions, two have defined responsibilities within their implementing procedures at the EOF and JIC to interface with the states - the EOF Manager and the JIC Logistics Coordinator. In the submission they also outlined how the responsibilities of those positions would be absorbed by other positions. After conducting a review of the elimination of those two positions in the EOF and JIC, it has been determined that the impact is minimal to the state's ability to coordinate with plant personnel during an emergency. State personnel will continue to coordinate and work with the personnel who will remain at the EOF and JIC, including those



people who will absorb the responsibilities of the eliminated positions.

This LAR as well as the other proposed changes to the licensee emergency plan have far-reaching impacts to off-site emergency plans maintained by the State and local jurisdictions. The proposed changes in the plan directly affect how the state will respond to this incident and therefore it is critical that input is solicited at the earliest possible point. While VY, in this case, has provided the submissions to the State once they have sent them to the NRC, it would be advantageous for the states to have the ability to view and provide comment on the plan changes before they are submitted to the NRC. This would provide the states additional time to make plan changes off-site and implement necessary changes to the program as the hazards on site change. This will also cut down more Requests for Additional Information from the NRC regarding how much the licensee has involved the off-site response organizations in making these changes because the license would be able to provide that information.

Recognizing the Vermont Public Service Department is designated as the State Liaison, it is the view of DEMHS that the NRC should require licensees to integrate Offsite Response Organizations at the state level ahead of LARs 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. This will increase licensee and state communication in a time period when information sharing could become difficult due to the dynamic environment that exists for a decommissioning nuclear power plant.

Thank you.

NRC or Vermont Yankee questions regarding these comments may be directed to the Vermont State Nuclear Engineer and Decommissioning Coordinator via the contact information included below, who will redirect them to the appropriate Vermont DEMHS staff.

Regards,

/s/ Anthony R. Leshinskie

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