



**Entergy Nuclear Operations, Inc.**

Vermont Yankee  
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802-257-7711

**Christopher J. Wamser**  
Site Vice President

BVY 15-045

July 16, 2015

10 CFR 50.90  
10 CFR 50.54(q)(4)

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

**SUBJECT:** Vermont Yankee Permanently Defueled Emergency Plan and Emergency Action Level Scheme - Supplement 4 (TAC No. MF4279)  
Vermont Yankee Nuclear Power Station  
Docket No. 50-271  
License No. DPR-28

**REFERENCES:**

1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Vermont Yankee Permanently Defueled Emergency Plan and Emergency Action Level Scheme," BVY 14-033, dated June 12, 2014 (ML14168A302) (TAC No. MF4279)
2. Email, NRC to Entergy Nuclear Operations, Inc. "Request for Info-EP," dated July 8, 2015

Dear Sir or Madam:

By letter dated June 12, 2014 (Reference 1), Entergy Nuclear Operations, Inc. (ENO) requested an amendment to Renewed Facility Operating License Number DPR-28 for Vermont Yankee Nuclear Power Station (VY). The proposed amendment would revise the Site Emergency Plan and Emergency Action Level Scheme commensurate with the permanently defueled condition of the VY reactor vessel.

In Reference 2, the NRC provided ENO with a request for additional information (RAI). Attachment 1 of this letter contains the response to the RAI. Attachment 2 contains a replacement page of the VY Permanently Defueled Emergency Plan, Revision 0.

The conclusions of the no significant hazards consideration and the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this supplement.

Should you have any questions concerning this letter or require additional information, please contact Mr. Philip Couture at 802-451-3193.

This letter contains no new regulatory commitments.

AX45  
LRR

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 16, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ch Recchia', followed by a long horizontal flourish.

CJW/plc

- Attachments:
1. Response to Request for Additional Information
  2. Replacement Page for Permanently Defueled Emergency Plan, Revision 0

cc: Mr. Daniel H. Dorman, Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

Mr. James S. Kim, Project Manager  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop O8D15  
Washington, DC 20555

Mr. Christopher Recchia, Commissioner  
Vermont Department of Public Service  
112 State Street – Drawer 20  
Montpelier, Vermont 05602-2601

Attachment 1

Vermont Yankee Nuclear Power Station  
Response to Request for Additional Information

**REQUEST FOR ADDITIONAL INFORMATION  
REGARDING AMENDMENT REQUEST FOR  
PERMANENTLY DEFUELED EMERGENCY PLAN CHANGE  
ENTERGY NUCLEAR OPERATIONS, INC.  
VERMONT YANKEE NUCLEAR POWER STATION  
DOCKET NOS. 50-271**

With regards to NSIR/DPR-ISG-02, Interim Staff Guidance, Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants, dated May 11, 2015, in Attachment 1 on page 33, in the table, Item A4. indicates that each licensee shall be capable of continuous (24-hour) operations for a protracted period (with respect to emergency response). Please identify what document that is on the docket identifies that you meet this criteria.

Response

Section 8.2 of the Permanently Defueled Emergency Plan (PDEP) provided as Attachment 2 of Reference 1 is revised to add the following statement (shown in underline format):

**8.2. Emergency Response Organization**

*The VY ERO is activated at an Alert classification. However, it can be activated in part or in whole at the discretion of the Emergency Director for an Unusual Event.*

*Plans and procedures are in place to ensure the timely activation of the ERO. The goal of the ERO is to augment the on-shift staff within 2 hours of an Alert classification. Due to the slow rate of the postulated event scenarios in the accident analysis and the ability of the on-shift staff to implement the Emergency Plan, the ERO augmentation goal of 2 hours is appropriate. The designated on-shift and augmented VY ERO staff are capable of continuous (24-hour) operations for a protracted period.*

*The minimum augmented staff consists of a Technical Coordinator and a Radiation Protection Coordinator. Augmented staff provides the technical expertise required to assist the Emergency Director. The on-shift staff is augmented by additional personnel that report as directed after receiving notification of an emergency requiring augmented staff. Designated members of the on-shift staff fulfill roles within the ERO appropriate with their training and experience. For example, Radiation Protection personnel would be expected to undertake radiation protection activities, Security personnel would undertake security activities, engineering personnel would focus on plant assessment, provide technical support and assist in recovery operations as designated by the Technical Coordinator, and Operations personnel would focus on plant operations.*

*The VY ERO is illustrated in Figure 8.1.*

Attachment 2 of this letter provides a replacement page for the PDEP to reflect this change. Section 8.2 is also reformatted (last line is brought up to 3<sup>rd</sup> paragraph) to maintain pagination.

References

1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Vermont Yankee Permanently Defueled Emergency Plan and Emergency Action Level Scheme - Supplement 3 (TAC No. MF4279)," BVY 15-039, dated June 18, 2015 (ML15173A100)

Attachment 2

Vermont Yankee Nuclear Power Station

Replacement Page for Permanently Defueled Emergency Plan, Revision 0

## **8.2. Emergency Response Organization**

The VY ERO is activated at an Alert classification. However, it can be activated in part or in whole at the discretion of the Emergency Director for an Unusual Event.

Plans and procedures are in place to ensure the timely activation of the ERO. The goal of the ERO is to augment the on-shift staff within 2 hours of an Alert classification. Due to the slow rate of the postulated event scenarios in the accident analysis and the ability of the on-shift staff to implement the Emergency Plan, the ERO augmentation goal of 2 hours is appropriate. The designated on-shift and augmented VY ERO staff are capable of continuous (24-hour) operations for a protracted period.

The minimum augmented staff consists of a Technical Coordinator and a Radiation Protection Coordinator. Augmented staff provides the technical expertise required to assist the Emergency Director. The on-shift staff is augmented by additional personnel that report as directed after receiving notification of an emergency requiring augmented staff. Designated members of the on-shift staff fulfill roles within the ERO appropriate with their training and experience. For example, Radiation Protection personnel would be expected to undertake radiation protection activities, Security personnel would undertake security activities, engineering personnel would focus on plant assessment, provide technical support and assist in recovery operations as designated by the Technical Coordinator, and Operations personnel would focus on plant operations. The VY ERO is illustrated in Figure 8.1.

### **8.2.1. Technical Coordinator**

The Technical Coordinator reports to the Emergency Director. During an emergency, the responsibilities of the Technical Coordinator include:

1. Evaluate technical data pertinent to plant conditions
2. Augment the emergency staff as deemed necessary
3. Designate engineering support, as necessary, to evaluate plant conditions and provide technical support
4. Recommend mitigating and corrective actions
5. Direct search and rescue operations
6. Coordinate maintenance and equipment restoration
7. Establish and maintain communications as desired by the Emergency Director
8. Maintain a record of event activities

Permanently Defueled  
Emergency Plan  
Revision 0  
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