



State of New Hampshire Department of Safety

John J. Barthelmes, Commissioner

Kevin P. O'Brien, Assistant Commissioner

Homeland Security and Emergency Management

Perry E. Plummer, Director

Jennifer L. Harper, Assistant Director



June 26, 2015

Mr. Christopher Wamser
Site Vice President
Entergy Nuclear Vermont Yankee, LLC
P.O. Box 250
320 Governor Hunt Road
Vernon, VT 05354

Dear Mr. Wamser,

On June 26, 2015, The State of New Hampshire Department of Safety, Division of Homeland Security and Emergency Management (NHHSEM) entered into a Settlement Agreement with Entergy Nuclear Vermont Yankee, LLC, pursuant to the Vermont Yankee Nuclear Power Station (VYNPS) located in Vernon, Vermont.

Over the years, NHHSEM and Vermont Yankee have worked collaboratively to develop and manage the offsite preparedness and response plan as it pertains to the State of NH and the protection of its citizens. The decision to decommission the plant and cease power generation operations on December 29, 2014 prompted a review of the offsite response plan requirements and its continuing appropriateness. Pursuant to this, NHHSEM has reviewed Entergy VY's (1) License Amendment Request ("LAR") to revise the VYNPS emergency plan and emergency action level scheme to reflect the plant's permanently defueled condition; (2) Permanently Defueled Emergency Plan, Rev. 0 ("PDEP"); (3) Permanently Defueled Emergency Action Level Technical Bases, Rev. 0; and (4) Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR Part 50, Appendix E.

After careful review, NHHSEM feels the "Permanently Defueled Emergency Plan" and revised emergency action levels are appropriate for the substantially reduced radiological risk and consequences of any potential emergencies in VYNPS' permanently shut down and defueled condition. NHHSEM is comfortable that under the PDEP and reduced scope of required activities that there will be adequate offsite emergency planning, coordination and protection when VYNPS is permanently shut down. For example, the VYNPS PDEP includes provisions for communication with and the rapid deployment of offsite mutual aid resources (such as law enforcement, ambulance, or fire/rescue services), as required under U.S. Nuclear Regulatory Commission (NRC) regulations.

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If approved by the NRC, the license amendment would reduce some of the emergency planning burden on offsite response organizations within the Emergency Planning Zone (EPZ), including the elimination of the Federal Emergency Management Agency (FEMA) requirement for periodic, full-scale emergency planning exercise evaluations.

Under the PDEP, NHHSEM and other state and local response organizations would implement their approved comprehensive, all-hazard emergency management plans and have the opportunity to participate in VYNPS emergency planning drills and exercises as offered by the facility.

Given these conditions outlined in the PDEP and funding provided in the settlement agreement to allow NHHSEM to continue to monitor activities, New Hampshire Homeland Security and Emergency Management does not oppose the approval of the LAR.

We look forward to continuing to work with Vermont Yankee to ensure the safety of the citizens of NH.

Sincerely,



Perry E. Plummer
Director

cc: Mary Ann Dempsey, Legal Counsel to Governor Maggie Hassan
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