



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

August 15, 2018

Mr. Corey Daniels
Director, Nuclear Decommissioning
Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
320 Governor Hunt Rd
Vernon, VT 05354

**SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION - ISSUANCE OF
AMENDMENT TO CHANGE THE PERMANENTLY DEFUELED TECHNICAL
SPECIFICATIONS TO REFLECT PERMANENT REMOVAL OF SPENT FUEL
FROM THE SPENT FUEL POOL (EPID NO. L-2017-LLA-0125)**

Dear Mr. Daniels:

In response to your application dated July 20, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17206A200), the U.S. Nuclear Regulatory Commission (NRC) has issued the enclosed Amendment No. 270 to Renewed Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station (VY). The amendment consists of revisions to the Renewed Operating License and the Permanently Defueled Technical Specifications (PDTS) to reflect removal of all spent nuclear fuel from the spent fuel pool (SFP) and transfer of the fuel to dry cask storage within an Independent Spent Fuel Storage Installation (ISFSI). The changes also make conforming revisions to the VY PDTS. These changes will reflect the permanently-shutdown status of VY, as well as the reduced scope of structures, systems, and components necessary to ensure plant safety once all spent fuel has been permanently moved to the VY ISFSI, an activity which is currently scheduled for completion in 2018.

The proposed changes include the relocation of administrative controls from the PDTS to the VY Quality Assurance Program Manual (QAPM). A new regulatory commitment is described in Attachment 5 to the application. The commitment states that the administrative controls relocated from the PDTS will be incorporated into the VY QAPM as shown and described in Attachment 4 to the application. The scheduled implementation date of the relocation of administrative controls from the PDTS to the QAPM is within 60 days following Entergy Nuclear Operations, Inc.'s notification to the NRC that all spent nuclear fuel has been transferred out of the spent fuel pool and placed within the ISFSI. NRC requests that completion of this action be reported to the NRC in writing.

The NRC staff has determined that its documented safety evaluation does not contain Sensitive Unclassified Non-Safeguards Information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390, "Public inspections, exemptions, requests for withholding." In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

C. Daniels

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A copy of the related Safety Evaluation is provided in Enclosure 2. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice. If you have any questions, please contact me at 301-415-6634, or via e-mail at Jack.Parrott@nrc.gov.

Sincerely,

/RA/

Jack D. Parrott, Senior Project Manager
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No. 50-271

Enclosures:

1. Amendment No. 270 to DPR-28
2. Safety Evaluation

cc w/encls: Distribution via Listserv

C. Daniels

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**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-271

VERMONT YANKEE NUCLEAR POWER STATION

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 270
License No. DPR-28

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for a license amendment filed by Entergy Nuclear Operations, Inc., dated July 20, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and applicable portions of the Commission's regulations set forth in 10 CFR Chapter I, and all required notifications to other agencies or bodies have been duly made;
 - B. The facility will operate in conformity with the application, as supplemented, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, Renewed Facility Operating License No. DPR-28 is amended as indicated in the attachment to this license amendment, and is hereby amended to read as follows:

Paragraph h. of the license findings of Renewed Facility Operating License No. DPR-28 is hereby deleted.

Paragraph 3.B. of Renewed Facility Operating License No. DPR-28 is hereby amended to read:

Enclosure 1

The Technical Specifications contained in Appendix A, as revised through Amendment No. 270, are hereby incorporated in the license. Entergy Nuclear Operations, Inc. shall operate the facility in accordance with the Technical Specifications.

Paragraph 3.C. of Renewed Facility Operating License No. DPR-28 is hereby amended to read:

Deleted per Amendment No. 270.

Paragraph 3.E.10. of Renewed Facility Operating License No. DPR-28 is hereby amended to read:

A report shall be submitted to MDPH and MDC by May 15 of each year specifying the total quantities of radioactive materials released to the Connecticut River during the previous calendar year.

Paragraph 3.E.13. of Renewed Facility Operating License No. DPR-28 is hereby amended to read:

This paragraph deleted by Amendment No. 270.

Paragraphs 3.K. through 3.S. of Renewed Facility Operating License No. DPR-28 are hereby deleted.

3. This license amendment is effective upon approval of the amendment, and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Bruce A. Watson, CHP, Chief
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Attachment:
Changes to Renewed Facility
Operating License No. DPR-28

Date of Issuance: August 15, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 270
TO RENEWED FACILITY OPERATING LICENSE NO. DPR-28
DOCKET NO. 50-271

Replace the following pages of Renewed Facility Operating License No. DPR-28 and Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License No DPR-28

REMOVE

first page

- 2 -
- 3 -
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- 7 -
- 8 -
- 9 -

INSERT

revised first page

- 2 -
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- 4 -
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Technical Specifications

REMOVE

All pages
(including title page)

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revised title page

- i -
1
2

Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc.

(Vermont Yankee Nuclear Power Station)

Docket No. 50-271

Renewed Facility Operating License

Renewed Operating License No. DPR-28

The U.S. Nuclear Regulatory Commission (NRC or the Commission), having previously made the findings set forth in Facility Operating License No. DPR-28, dated February 28, 1973, has now found that:

- a. This paragraph deleted by Amendment No. 263.
- b. The facility is prohibited from operating the reactor in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission; and
- c. There is reasonable assurance (i) that the activities authorized by this license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission; and
- d. Entergy Nuclear Vermont Yankee, LLC is financially qualified and Entergy Nuclear Operations, Inc. is technically and financially qualified to engage in the activities authorized by this license, in accordance with the rules and regulations of the Commission; and
- e. Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. have satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements" of the Commission's regulations; and
- f. The issuance of this license will not be inimical to the common defense and security or to the health and safety of the public; and
- g. After weighing the environmental, economic, technical and other benefits of the facility against environmental costs and considering available alternatives, the issuance of this license (subject to the conditions for protection of the environment set forth herein) is in accordance with 10 CFR Part 51, of the Commission's regulations and all applicable requirements of said Part 51 have been satisfied.

Renewed Facility Operating License No. DPR-28
Amendment ~~263~~, 270

Accordingly, Facility Operating License No. DPR-28, as amended, issued to Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. is superseded by Renewed Facility Operating License No. DPR-28 and is hereby amended in its entirety to read:

1. This renewed license applies to the Vermont Yankee Nuclear Power Station (the facility), a single cycle, boiling water, light water moderated and cooled reactor, and associated electric generating equipment. The facility is located on Entergy Nuclear Vermont Yankee, LLC's site, in the Town of Vernon, Windham County, Vermont, and is described in the application as amended.
2. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:
 - A. Pursuant to Sections 104b of the Atomic Energy Act of 1954, as amended (the Act), and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," Entergy Nuclear Vermont Yankee, LLC to possess and use, and Entergy Nuclear Operations, Inc., to possess and use the facility as a utilization facility at the designated location on the Entergy Nuclear Vermont Yankee, LLC site.
 - B. Entergy Nuclear Operations, Inc., pursuant to the Act and 10 CFR Part 70, to possess at any time special nuclear material that was used as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation as described in the Final Safety Analysis Report, as supplemented and amended.
 - C. Entergy Nuclear Operations, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source, and special nuclear material as sealed neutron sources that were used for reactor startup, sealed sources that were used for calibration of reactor instrumentation and are used in radiation monitoring equipment, and as fission detectors in amounts as required.
 - D. Entergy Nuclear Operations, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components.
 - E. Entergy Nuclear Operations, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not to separate, such byproduct and special nuclear material as may be produced by operation of the facility.

3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Section 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

- A. This paragraph deleted by Amendment No. 263.

- B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 270, are hereby incorporated in the license. Entergy Nuclear Operations, Inc. shall operate the facility in accordance with the Technical Specifications.

- C. This paragraph deleted by Amendment No. 270.

- D. This paragraph deleted by Amendment No. 226.

- E. Environmental Conditions

Pursuant to the Initial Decision of the presiding Atomic Safety and Licensing Board issued February 27, 1973, the following conditions for the protection of the environment are incorporated herein:

1. This paragraph deleted by Amendment No. 206, October 22, 2001.
2. This paragraph deleted by Amendment 131, 10/07/91.
3. This paragraph deleted by Amendment No. 206, October 22, 2001.
4. If harmful effects or evidence of irreversible damage in land or water ecosystems as a result of facility operation are detected by Entergy Nuclear Operations, Inc.'s environmental monitoring program, Entergy Nuclear Operations, Inc. shall provide an analysis of the problem to the Commission and to the advisory group for the Technical Specifications, and Entergy Nuclear Operations, Inc. thereafter will provide, subject to the review by the aforesaid advisory group, a course of action to be taken immediately to alleviate the problem.
5. Entergy Nuclear Operations, Inc. will grant authorized representatives of the Massachusetts Department of Public Health (MDPH) and Metropolitan District Commission (MDC) access to records and charts related to discharge of radioactive materials to the Connecticut River.
6. This paragraph deleted by Amendment No. 206, October 22, 2001.

7. This paragraph deleted by Amendment No. 206, October 22, 2001.
8. Entergy Nuclear Operations, Inc. will permit authorized representatives of the MDPH and MDC to examine the chemical and radioactivity analyses performed by Entergy Nuclear Operations, Inc.
9. Entergy Nuclear Operations, Inc. shall immediately notify MDPH, or an agency designated by MDPH, in the event concentrations of radioactive materials in liquid effluents, measured at the point of release from the Vermont Yankee facility, exceed the limit set forth in the facility Offsite Dose Calculation Manual. Entergy Nuclear Operations, Inc. will also notify MDPH in writing within 30 days following the release of radioactive materials in liquid effluents in excess of 10 percent of the limit set forth in the facility Offsite Dose Calculation Manual.
10. A report shall be submitted to MDPH and MDC by May 15 of each year, specifying the total quantities of radioactive materials released to the Connecticut River during the previous calendar year.
The report shall contain the following information:
 - (a) Total curie activity discharged other than tritium and dissolved gases.
 - (b) Total curie alpha activity discharged.
 - (c) Total curies of tritium discharged.
 - (d) Total curies of dissolved radio-gases discharged.
 - (e) Total volume (in gallons) of liquid waste discharged.
 - (f) Total volume (in gallons) of dilution water.
 - (g) Average concentration at discharge outfall.
 - (h) This paragraph deleted by Amendment No. 206, October 22, 2001.
 - (i) Total radioactivity (in curies) released by nuclide including dissolved radio-gases.
 - (j) Percent of the facility Offsite Dose Calculation Manual limit for total activity released.
11. This paragraph deleted by Amendment No. 206, October 22, 2001.
12. This paragraph deleted by Amendment No. 206, October 22, 2001.
13. This paragraph deleted by Amendment No. 270.

14. Entergy Nuclear Operations, Inc. shall furnish advance notification to MDPH, or to another Commonwealth agency designated by MDPH, of the time, method and proposed route through the Commonwealth of any shipments of nuclear fuel and wastes to and from the Vermont Yankee facility which will utilize railways or roadways in the Commonwealth.

F. This paragraph deleted by Amendment No. 263.

G. Security Plan

Entergy Nuclear Operations, Inc. shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans¹ including amendments made pursuant to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "ISFSI Physical Security Plan, Revision 0," approved on July 25, 2018.

H. This paragraph deleted by Amendment No. 107, 8/25/88.

I. This paragraph deleted by Amendment No. 131, 10/7/91.

¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

J. License Transfer Conditions

On the closing date of the transfer of Vermont Yankee Nuclear Power Station (Vermont Yankee), Entergy Nuclear Vermont Yankee, LLC shall obtain from Vermont Yankee Nuclear Power Corporation all of the accumulated decommissioning trust funds for the facility, and ensure the deposit of such funds into a decommissioning trust for Vermont Yankee established by Entergy Nuclear Vermont Yankee, LLC. If the amount of such funds does not meet or exceed the minimum amount required for the facility pursuant to 10 CFR 50.75, Entergy Nuclear Vermont Yankee, LLC shall at such time deposit additional funds into the trust and/or obtain a parent company guarantee (to be updated annually) and/or obtain a surety pursuant to 10 CFR 50.75(e)(1)(iii) in a form acceptable to the NRC and in an amount or amounts which, when combined with the decommissioning trust funds for the facility that have been obtained and deposited as required above, equals or exceeds the total amount required for the facility pursuant to 10 CFR 50.75. The decommissioning trust, and surety if utilized, shall be subject to or be consistent with the following requirements, as applicable:

a. Decommissioning Trust

- (i) The decommissioning trust agreement must be in a form acceptable to the NRC.
- (ii) With respect to the decommissioning trust funds, investments in the securities or other obligations of Entergy Corporation and its affiliates, successors, or assigns shall be prohibited. In addition, except for investments tied to market indexes or other non-nuclear-sector mutual funds, investments in any entity owning one or more nuclear power plants are prohibited.
- (iii) The decommissioning trust agreement must provide that no disbursements or payments from the trust, other than for ordinary administrative expenses, shall be made by the trustee until the trustee has first given the NRC 30 days prior written notice of payment. The decommissioning trust agreement shall further contain a provision that no disbursements or payments from the trust shall be made if the trustee receives prior written notice of objection from the Director of the Office of Nuclear Reactor Regulation.
- (iv) The decommissioning trust agreement must provide that the agreement cannot be amended in any material respect without 30 days prior written notification to the Director of the Office of Nuclear Reactor Regulation.

- (v) The appropriate section of the decommissioning trust agreement shall state that the trustee, investment advisor, or anyone else directing the investments made in the trust shall adhere to a "prudent investor" standard, as specified in 18 CFR 35.32(a)(3) of the Federal Energy Regulatory Commission's regulations.

b. Surety

- (i) The surety agreement must be in a form acceptable to the NRC and be in accordance with all applicable NRC regulations.
- (ii) The surety company providing any surety obtained to comply with the Order approving the transfer shall be one of those listed by the U.S. Department of the Treasury in the most recent edition of Circular 570 and shall have a coverage limit sufficient to cover the amount of the surety.
- (iii) Entergy Nuclear Vermont Yankee, LLC shall establish a standby trust to receive funds from the surety, if a surety is obtained, in the event that Entergy Nuclear Vermont Yankee, LLC defaults on its funding obligations for the decommissioning of Vermont Yankee. The standby trust agreement must be in a form acceptable to the NRC, and shall conform with all conditions otherwise applicable to the decommissioning trust agreement.
- (iv) The surety agreement must provide that the agreement cannot be amended in any material respect, or terminated, without 30 days prior written notification to the Director of the Office of Nuclear Reactor Regulation.

Entergy Nuclear Vermont Yankee, LLC shall take all necessary steps to ensure that the decommissioning trust is maintained in accordance with the application for approval of the transfer of this license to Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc., and the requirements of the Order approving the transfer, and consistent with the safety evaluation supporting the Order.

Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. shall take no action to cause Entergy Global Investments, Inc., or Entergy International Holdings Ltd. LLC, or their parent companies to void, cancel, or modify the lines of credit to provide funding for Vermont Yankee as represented in the application without prior written consent of the Director of the Office of Nuclear Reactor Regulation.

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4. This license is effective as of the date of issuance and is effective until the Commission notifies the licensee in writing that the license is terminated.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By
Eric J. Leeds

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Enclosures:
Appendix A - Technical Specifications

Date of Issuance: March 21, 2011

APPENDIX A

TO

10 CFR PART 50 LICENSE DPR-28

TECHNICAL SPECIFICATIONS

FOR

VERMONT YANKEE NUCLEAR POWER STATION

VERNON, VERMONT

ENTERGY NUCLEAR OPERATIONS, INC.

AND

ENTERGY NUCLEAR VERMONT YANKEE, LLC

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5.0 DESIGN FEATURES

5.1 Site

The station is located on the property on the west bank of the Connecticut River in the Town of Vernon, Vermont, which Entergy Nuclear Vermont Yankee, LLC either owns or to which it has perpetual rights and easements.

5.2 Spent Fuel Storage

Spent Fuel shall not be stored in the Spent Fuel Pool.

6.0 ADMINISTRATIVE CONTROLS

6.1 Deleted

6.2 Deleted

6.3 Deleted

6.4 Deleted

6.5 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraphs 20.1601(a) and 20.1601(b) of 10 CFR 20:

A. High Radiation Areas with dose rates greater than 0.1 rem/hour at 30 centimeters, but not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation:

1. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
2. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
3. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
4. Each individual or group entering such an area shall possess:
 - a. A radiation monitoring device that continuously displays radiation dose rates in the area, or
 - b. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 - c. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

- d. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 1. Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 2. Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
 5. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
- B. High Radiation Areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or from any surface penetrated by the radiation:
1. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
 - a. All such door and gate keys shall be maintained under the administrative control of the shift supervisor, and/or radiation protection manager, or his or her designee.
 - b. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
 2. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
 3. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

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4. Each individual or group entering such an area shall possess one of the following:
 - a. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 - b. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
 - c. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 1. Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 2. Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
 - d. In those cases where option (b) and (c), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
5. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
6. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.