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FVY 83-49

May 31, 1983

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation
Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

References (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, YAEC to USNRC, FYR 83-07, dated January 13, 1983
(c) Letter, USNRC to YAEC, dated February 2, 1983

Subject: Vermont Yankee 1983 Emergency Exercise Plans

Dear Sir:

The purpose of this letter is to inform you that we have adopted the emergency plan exercise concept proposed by Yankee Atomic Electric Company in Reference (b), which has been accepted by the NRC in Reference (c). In keeping with this concept, we have scheduled an "EOF-IN" exercise for August 11, 1983 and an "EOF-OUT" exercise for September 21, 1983.

Enclosed are a series of Attachments which meet the intent of Vermont Yankee Nuclear Power Corporation in conducting these scheduled exercises. Attachment I is a list of objectives for the "EOF-IN" exercise. Attachment II is a simulation list corresponding to the "EOF-IN" exercise arrangements. Attachment III is a list of objectives for the "EOF-OUT" exercise. Attachment IV is a simulation list corresponding to the "EOF-OUT" exercise.

If you have any questions concerning this submittal, please contact us immediately as we do not want to delay the planning process. If no further communications are received relative to this issue, our plans will be considered accepted.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

J B Sinclair

J. B. Sinclair
Licensing Engineer

IE 35

PDC/lmm
Enclosure

Attachment I

Objectives for the August 11, 1983
Vermont Yankee Nuclear Power Station Emergency Plan Exercise
("EOF-IN")

1. Demonstrate that the new "EOF-IN" exercise concept represents an improvement in the testing of on-site emergency response plans and procedures.

2. Provide an opportunity for hands-on practice and experience in performance of emergency duties in accordance with the emergency plan implementing procedures under simulated emergency conditions.

3. Test and evaluate the ability of station personnel to recognize emergency initiating events and properly catagorize and classify the emergency according to pre-established Emergency Action Levels.

4. Demonstrate that plant personnel can manage the initial manpower needs required by each on-site center and that these staffing levels can be augmented if escalation of the event warrants such action (i.e., use of on-site assistance teams).

5. Test and evaluate the adequacy of the plant emergency notification process and those emergency communication channels dedicated to this process. This will include review of such elements as:

   a. The use of the Nuclear Alert System;
   b. The activation of the Yankee NSD pager system; and
   c. The use of in-plant telephone and page systems in managing required communications.

6. Test and evaluate control measures used in conducting an orderly plant evacuation.

7. Demonstrate the ability of plant personnel to properly implement the activaton of in-plant emergency response facilities (i.e., Control Room, TSC, OSC, and partial EOF/RC activation) as appropriate for the existing emergency class and test the transfer of organizational control among centers when escalating or de-escalating to a different emergency class.

8. Demonstrate that the plant has established adequate engineering support capability (i.e., the Engineering Support Center) to provide in-depth accident analysis.

9. Test and evaluate the plant's ability to conduct in-plant radiological surveys, post accident sampling, and analysis, and to establish appropriate emergency radiation exposure control measures associated with these activities.

10. Demonstrate that adequate security measures, such as personnel accountability and plant access control, are implemented under simulated emergency conditions.

Attachment 1

Objectives for the August 11, 1983
Vermont Yankee Nuclear Power Station Emergency Plan Exercise
("EOF-IN")

11. Test and evaluate the organization's implementation of a on-site recovery phase following simulated accident conditions.

12. Demonstrate the plant's ability to manage effective documentation associated with performance of the following:

    a. Emergency communications;
    b. Emergency calculations;
    c. Emergency response actions; and
    d. Emergency exposure control.

Attachment II

The 1983 Vermont Yankee Nuclear Power Station Emergeny Plan Exercise ("EOF-IN") Simulation List

1. If exercise conditions warrant the issuance of potassium iodide (KI), then the decision will be recorded but the action will be simulated.

2. All in-plant corrective actions will be simulated.

3. During the exercise, a complete plant evacuation and center activation will initially occur. Once the exercise participants have been selected, then those personnel unassigned will be allowed to return to their normal duties.

4. If exercise conditions warrant off-site monitoring team action, then off-site monitoring team results will be issued to selected EOF staff to simulate that these actions have been taken.

5. If exercise conditions warrant implementation of decontamination practices, then these actions will be simulated in-plant.

6. Plant access control measures will be simulated during the exercise.

7. The emergency plant pager system activation will be simulated.

8. It is not the intent of this exercise to demonstrate off-site governmental interface.

9. Sample analysis activities at the EOF/RC will be simulated by issuing results to EOF staff.

10. Decision-making actions relative to in-plant recovery planning will be implemented but actions dictated by this planning process will be simulated.

11. The entire EOF/RC organization will not be fully activated for this exercise. Sufficient EOF/RC staff will be activated to support communications, personnel monitoring, and manpower planning for plant support/plant recovery.

12. The News Media Center will not be activated for this exercise.

13. Yankee NSD emergency response will be activated through the "pager" arrangement, but only the plant engineering and nuclear engineering elements will respond.

14. Yankee NSD site response will be pre-staged for exercise purposes.

15. Those persons designated as Controllers/Observers will not be required to participate in the exercise response actions.

16. For the purpose of the exercise, smoking and drinking will be allowed at all emergency centers. Drinking will not be allowed in any portion of the OSC located within the Radiation Control Area.

Attachment III

The 1983 Vermont Yankee Nuclear Power Station Emergency Plan Exercise ("EOF-OUT") Objectives

1. Demonstrate that the new "EOF-OUT" exercise concept represents an improvement in the test of State and local emergency response plans.

2. Demonstrate the performance of emergency duties associated with the coordination and interface of plant response with off-site governmental agency response.

3. Test and evaluate the plant's ability to effectively notify all responding off-site organizations of the appropriate emergency class associated with the escalation and de-escalation of accident conditions.

4. Demonstrate that protective action recommendations can be issued in a timely and effective manner to the State decision makers.

5. Test and evaluate the ability of field sample teams to conduct off-site radiological surveys, transmit results to the EOF/RC and effectively integrate the analysis of these field results in the dose projection and accident assessment process.

6. Demonstrate that the emergency response organizations can effectively consider re-entry and recovery aspects associated with the termination of the emergency phase with respect to offsite agencies and offsite radiological conditions.

7. Demonstrate the ability of emergency response personnel to properly implement the activation of selected emergency response facilities (i.e., full EOF/RC, News Media Center, and partial Engineering Support Center activation) as appropriate for the existing emergency class.

8. Security access control measures at both the EOF/RC and the News Media Center will be activated.

9. Demonstrate the ability of the plant emergency response organization to manage manpower planning associated with adequate staffing of EOF/RC and Media Center functions.

9. Demonstrate that the EOF/RC staff can manage effective documentation associated with the performance of the following:

   a. On-site and off-site emergency communications;
   b. Dose projection analysis; and
   c. Emergency response actions and the decision-making process associated with those response actions;

10. Demonstrate that the News Media Center can access accident information, provide direct interface with State media representatives, and issue coordinated press releases in a timely fashion.

Attachment IV

The 1983 Vermont Yankee Nuclear Power Station Emergency Plan Exercise ("EOF-OUT") Simulation List

1. The initial declaration of an emergency condition will be made in the Control Room by the Shift Supervisor/Plant Emergency Director. All subsequent declarations of an escalating emergency condition will be simulated by the Exercise Controller in the TSC.

2. All in-plant emergency centers will not be activated. An Exercise Controller will simulate the TSC communications to the EOF/RC.

3. The initial plant announcement will be modified to request only EOF/RC personnel response.

4. Although site access control measures will be conducted, the personnel accountability process will be simulated.

5. The Yankee NSD emergency response will be fully activated through "pager" notification, but only the environmental department elements will respond.

6. The present dose assessment capability of Vermont Yankee will be tested during this exercise. In addition, the near-term dose assessment model and system will be activated by a NSD engineer during the exercise to demonstrate the improvements being made by Vermont Yankee in the dose assessment area.

7. A pre-programmed meteorological data base will be used to simulate exercise scenario conditions.

8. The administration of KI will be simulated.

9. Press releases will be written and approved, but actual releases to the press will be simulated.

10. Offsite monitoring teams will not be required to wear protective clothing.

11. Exercise players will be allowed to eat and drink without considering potential radiological contamination due to the simulated radiological conditions.

12. Emergency personnel will simulate decontamination practices if required.

13. Actual silver loaded silica gel cartridges will not be used during the exercise. All kits are provided with a set of charcoal cartridges which the players will be instructed to simulate their use as silica gel.

14. Controllers/Observers and State agency representatives will not be issued personnel dosimetry unless they are required to enter the plant proper.

15. Those persons designated as Controllers/Observers will not be required to participate in exercise response.