

SVY 20-081

16 October 2020 File No. 129657

Gerold Noyes, PE Environmental Engineer Department of Environmental Conservation Waste Management and Prevention Division Sites Management Section 1 National Life Drive – Davis 1 Montpelier, VT 05620-3704

Subject: Post-Demolition Survey and Sampling Plan Vermont Yankee Nuclear Power Station 320 Governor Hunt Road Vernon, Vermont

Dear Mr. Noyes:

Haley & Aldrich, on behalf of the NorthStar Vermont Yankee Decommissioning Project (VY), has prepared this Post-Demolition Survey and Sampling Plan to support the ongoing efforts to reach site closure and demonstrate compliance with the Memorandum of Understanding (MOU) #8880 between your agency and NorthStar Nuclear Decommissioning Company, LLC.

This plan has been designed to evaluate soils following slab and structure removals as well as pipe trenches and paved areas. The purpose of these actions is to supplement our Supplemental Site Investigation (SSI) findings and document final site conditions. This plan will also provide VY hold points to ensure that environmental professionals are both notified and on site when areas are exposed so that we may conduct these surveys in a timely manner, and without impacting the decontamination and decommissioning (D&D) schedule.

If you have any questions, please feel free to call Nadia Glucksberg at 207-482-4623 at your convenience.

Sincerely yours, HALEY & ALDRICH, INC.

Miles van Noordennen, CHMM Sr. Technical Specialist

Nadia Glucksberg Program Manager

www.haleyaldrich.com



POST-DEMOLITION SURVEY AND SAMPLING PLAN VERMONT YANKEE NUCLEAR POWER STATION 320 GOVERNOR HUNT ROAD VERNON, VERMONT

by Haley & Aldrich, Inc. Rocky Hill, Connecticut

for NorthStar Nuclear Decommissioning Company, LLC Vernon, Vermont

File No. 129657 October 2020





Enclosures

SIGNATURE PAGE FOR

POST-DEMOLITION SURVEY AND SAMPLING PLAN VERMONT YANKEE NUCLEAR POWER STATION 320 GOVERNOR HUNT ROAD VERNON, VERMONT

PREPARED FOR NORTHSTAR NUCLEAR DECOMMISSIONING COMPANY, LLC VERNON, VERMONT

PREPARED BY:

Miles van Noordennen Senior Technical Specialist Haley & Aldrich, Inc.

REVIEWED AND APPROVED BY:

Nadia Glucksberg Program Manager Haley & Aldrich, Inc.

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Elida Danaher Senior Technical Specialist Haley & Aldrich, Inc.

Executive Summary

Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this Post-Demolition Survey and Sampling Plan (Sampling Plan) on behalf of NorthStar Nuclear Decommissioning Company, LLC (NNDC) to support the ongoing decontamination and decommissioning (D&D) activities being completed at the Vermont Yankee Nuclear Power Station (VYNPS) located in Vernon, Vermont. Specifically, this Sampling Plan describes the survey and sampling activities that will be implemented related to the buildings/structures as they are demolished and removed from site.

After each structure, or portions of a structure if applicable, has been removed, qualified field personnel will perform a walk-down to identify potentially impacted areas within the former structure's footprint (See Figures 3 and 4, and Table 1). The walk-down will consist of a visual survey and will be documented with photographs. For aboveground storage tanks (ASTs) that are located above asphalt, walk-downs will be conducted both at the time of tank removal to assess potential staining on the pavement, and again following paving removal to assess the underlying soils. Any staining or discoloration in the underlying soils that are not obviously naturally occurring will be identified and documented.

Post-demolition survey and sampling results will be documented in a final Report following all D&D activities. If any soil remediation is required resulting from any post-demolition survey and sampling efforts, that work would be completed and documented under a separate Corrective Action Plan. Sample locations including photoionization detector (PID) screening locations will be documented in the final Report along with any analytical sample results.

The goal of these activities is to support the Supplemental Site Investigation Report findings and evaluate if there are undocumented releases that require remedial actions and to demonstrate that final site conditions are in compliance with the clean-up criteria as regulated by the Investigation and Remediation of Contaminated Properties Rule as adopted on July 6, 2019 (I-Rule).



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Figure No.	Title
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2	Current Site Conditions (Circa 20XX)
3	Site Structures
4	Relevant Piping



List of Abbreviations

AST	above-ground storage tank
D&D	decontamination and decommissioning
ENVY EPH	Entergy Nuclear Vermont Yankee extractable petroleum hydrocarbon
ft bgs	feet below ground surface
Haley & Aldrich	Haley & Aldrich, Inc.
NNDC NRC	NorthStar Nuclear Decommissioning Company, LLC Nuclear Regulatory Commission
PAH PID	polynuclear aromatic hydrocarbon photoionization detector
QAPP	Quality Assurance Project Plan
Sampling Plan	Post-Demolition Survey and Sampling Plan
VPH VYNPS	volatile petroleum hydrocarbon Vermont Yankee Nuclear Power Station



1. Introduction

Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this Post-Demolition Survey and Sampling Plan (Sampling Plan) on behalf of NorthStar Nuclear Decommissioning Company, LLC (NNDC) to support the ongoing decontamination and decommissioning (D&D) activities being completed at the Vermont Yankee Nuclear Power Station (VYNPS) located in Vernon, Vermont. Specifically, this Plan describes the survey and sampling activities that will be implemented related to the buildings/structures as they are demolished and removed from site.

1.1 BACKGROUND

VYNPS is located in Vernon, Vermont (Figure 1) and was a pressurized water reactor that is currently undergoing D&D activities. The site is approximately 125 acres in size. It is bounded to the east and south by the Connecticut River, to the west by residential properties, and to the north by agricultural fields. Formerly owned and operated by Entergy Nuclear Vermont Yankee (ENVY), the Nuclear Regulatory Commission (NRC) license and property ownership were transferred to NNDC on 11 January 2019. NNDC will close the Site, bringing it to a greenfield condition, including removing all structures to four feet below ground surface (ft bgs) and remediating any environmental media, as necessary.

1.2 PURPOSE

The purpose of this Sampling Plan is to describe the sampling frequencies and methods for assessing buildings/structures and their associated footprints with respect to non-radiological constituents following demolition activities. Results from these efforts, supplemented with data collected during site investigations completed to-date and summarized in the Non-Radiological Site Investigation Report (Haley & Aldrich, 2019) and Non-Radiological Supplemental Site Investigation Report (Haley & Aldrich, 2019), will be used to support the demolition and closure of the following areas:

- Building slabs and/or foundations;
- Fuel Oil Above-Ground Storage Tanks (ASTs);
- Underground fuel oil piping;
- Building drains and piping; and
- Paved areas.

These structures and areas are shown on Figures 3 and 4.



2. Proposed Survey and Sampling Activities

2.1 POST-DEMOLITION WALK-DOWN AND INSPECTION

After each structure, or portions of a structure if applicable, has been removed, qualified field personnel will perform a walk-down to identify potentially impacted areas within the former structure's footprint (See Figures 3 and 4, and Table 1). The walk-down will consist of a visual survey and will be documented with photographs. For ASTs that are located above asphalt, walk-downs will be conducted both at the time of tank removal to assess potential staining on the pavement, and again following paving removal to assess the underlying soils. Any staining or discoloration in the underlying soils that are not obviously naturally occurring will be identified and documented.

Following, or concurrent, with the walk-downs, a photoionization detector (PID) will be used to generally screen the shallow soils within the footprint to assess the potential for any general releases of chemicals from the structures to the underlying soils such as fuel oils or solvents.

2.2 POST-DEMOLITION SAMPLING RATIONALE

As discussed above, walk-downs will be completed at each area or structure to identify any areas of stained soils or areas that show other indications of potential contamination. If a minor stained area (i.e. 25 square feet or less in size) is identified during the post-demolition inspection, a single soil sample will be collected from a representative location as determined by qualified field personnel. For larger stained areas, one sample per 25 square feet of visibly stained soil will be collected, up to a maximum of four samples collected per individual stained area. At a minimum, samples will be submitted for analysis of polynuclear aromatic hydrocarbons (PAHs), extractable petroleum hydrocarbons (EPH), and volatile petroleum hydrocarbons (VPH). If other contaminants were known to be stored in the area or structure previously, samples will also be submitted for analysis of those parameters.

In addition to collecting biased samples from stained areas, field screening will be completed using a PID. Soils will be exposed using dedicated or reusable equipment (i.e. scoopulas, spoons, etc.) and PID measurements will be collected directly from those exposed soils. Areas of elevated PID readings based on field judgement will also be sampled and submitted for PAH, EPH, and VPH analysis.

Areas or locations beneath structures that do not exhibit staining or other indications of contamination will be assessed as described in the following subsections.

2.2.1 Building Slabs/Foundations

PID screening will be completed on a 50-foot grid following removal of building slabs/foundations to assess underlying soil conditions. If any elevated PID readings are noted during the screening, analytical samples will be collected from the impacted area as well as from below the impacted area. Samples will be submitted for analysis of applicable parameters based on professional judgement.

For structures with foundations remaining in place, namely sub-surface structures, a walkdown will take place to survey the entire area to ensure that all components and materials have been removed from the structure, and to note the condition of the remaining concrete. If any stained concrete is noted during the walkdown, samples will be collected and submitted for analysis of polychlorinated biphenyls (PCBs) and PAHs.



As an example, we understand that areas such as the former Chemistry Laboratory are identified as Potential Contaminant Sources (PCSs) and this approach will allow NNDC to include a hold point in the demolition process to allow for surveys and sampling as appropriate to document site conditions and demonstrate compliance with the I-Rule.

2.2.2 Fuel Oil ASTs

At a minimum, one sample will be collected from soils beneath each fuel oil AST following pavement removal, if applicable, biased to the area directly below any valves or areas where staining was observed on the pavement. If staining was observed on the underlying soils, additional samples may also be collected, depending on the size of the stained area, following the guidance described above in Section 2.2. In the event stained soils are observed, samples will be collected from both the impacted soil and from soils immediately below the impacted soils to bound the potentially contaminated area. Soil samples will be submitted for applicable parameters as shown on Table 1.

2.2.3 Storm Water Catch Basins

Catch basins onsite have been routinely inspected and have found to be in proper working order and without accumulation of sediments within the basins. The outfalls associated with each of the catch basins onsite have been characterized as part of the site investigations completed to-date with no remediation required. Catch basins and associated outfalls are currently planned to be left in place. However, if NNDC completes removal of the storm water system as part of the D&D activities, including all piping, catch basins, and outfalls, all components will be visually inspected upon removal to verify the integrity of the systems.

2.2.4 Underground Fuel Oil Piping

The Vermont Department of Environmental Conservation (VT DEC) Underground Storage Tank Program will be notified at least five days prior to the commencement of underground piping closure activities. Upon removal of underground fuel oil piping, the associated pipe trench will be inspected and direct PID readings will be taken every 25 linear feet. If elevated readings are observed, or if stained soils are noted, soil samples will be collected at those locations and submitted for analysis of PAHs, EPH, VPH, and metals. Whether stained soils or elevated PID readings are observed or not, a minimum of one sample will still be collected every 100 linear feet of a singular pipe (or one sample per 1,000 square feet of excavation area where multiple lines are removed) and submitted for analysis of PAHs, EPH, VPH, and total metals. Field observations and PID measurements will be recorded on the VT DEC Underground Storage Tank and Piping Closure Form. An electronic version of this form along with any other relevant documentation will be sent to the VT DEC Waste Management and Prevention Division (WMPD).

Please note that piping associated with both the 75,000-gallon Fuel Oil Storage Tank (FOST) and the former 10,000-gallon Fuel Oil underground storage tank (UST) are already part of a Remediation Plan. The additional surveys proposed here are for areas of the piping where we have not delineated impacts or releases. The known impacted areas will be remediated under a formal Corrective Action Plan (CAP).



2.2.5 Building Drains and Piping

Any building drains identified at the VYNPS will be visually surveyed at the drain locations and along the drain pipelines upon removal. At this time, these activities are not anticipated as all known drains and associated piping are contained within buildings and discharge(d) into processing tanks without having opportunity to reach underlying soils. If conditions change, or if unexpected drains or piping are encountered during building demolition activities, these areas will be visually inspected and soil samples will be collected, as necessary.

2.2.6 Former Storage Areas (RCRA Less Than 90 Day Areas and Satellite Storage Areas).

Prior to demolition of areas that were formerly used as storage areas for hazardous waste, a walk- down will be completed by qualified field personnel to identify potentially impacted areas. The walk-down will consist of a visual survey and will be documented with photographs. The floors in this area will be inspected for visible cracks, sealed cracks, floor drains, sealed floor drains, and staining. Observations will be documented in the Hazardous Waste Generator Pre-Closure Notification Form and submitted to the VT DEC WMPD.

Upon removal, walk-downs of the areas will be conducted to identify any potential stained areas. PID screening will also be completed on a 50-foot grid (one measurement every 2,500 square feet). Soil samples will be collected if stained soils or elevated PID readings are observed. If no stained soils or elevated PID readings are observed, soil samples will be collected to confirm there are no impacts at a frequency of one per one hundred square feet. Those samples will be submitted for analysis of PAHs, EPH, and VPH.

2.2.7 Paved Areas

Parking lot pavement and other paved areas around the VYNPS may be removed as part of the D&D activities. Upon removal, walk-downs of the areas will be conducted to identify any potential stained areas. PID screening will also be completed on a 50-foot grid (one measurement every 2,500 square feet). Soil samples will be collected if stained soils or elevated PID readings are observed. Those samples will be submitted for analysis of PAHs, EPH, and VPH.

2.3 SAMPLE ANALYSIS

Samples will be collected following the Quality Assurance Project Plan (QAPP)(Haley & Aldrich, 2019) and submitted to Alpha Analytical Laboratories of Marlborough, Massachusetts. Samples will be collected from the shallow exposed soils from 0 to 0.5 ft bgs.

2.4 POST-DEMOLITION SURVEY AND SAMPLING DOCUMENTATION

Post-demolition survey and sampling results will be documented in a final Report following all D&D activities. If any soil remediation is required resulting from any post-demolition survey and sampling efforts, that work would be completed and documented under a separate Corrective Action Plan. Sample locations including PID screening locations will be documented in the final Report along with any analytical sample results.



References

- 1. Haley & Aldrich, Quality Assurance Project Plan, Rev. F, Vermont Yankee Nuclear Power Station, Vernon, Vermont, April 2019.
- 2. Haley & Aldrich, Non-Radiological Site Investigation Report, Rev. A, Vermont Yankee Nuclear Power Station, Vernon, Vermont, July 2019.
- 3. Haley & Aldrich, Non-Radiological Supplemental Site Investigation Report, Rev. B, Vermont Yankee Nuclear Power Station, Vernon, Vermont, May 2020.
- 4. Vermont Department of Environmental Conservation, Aboveground Storage Tank Rules, Montpelier, Vermont, August 2017.
- 5. Vermont Department of Environmental Conservation, Underground Storage Tank Rules, Montpelier, Vermont, November 2019.
- 6. Vermont Department of Environmental Conservation, Vermont Hazardous Waste Generator and Facility Closure Guidance, Waterbury, Vermont, May 2005.

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TABLES

			Sampling Basis Per Removed Structure			Sampling Basis Per Remaining Structure			
			Approximate Square		Elevated PID Readings	Analytical	Walkdown Completed	Stained Areas Noted	Analytical
AOC	Structure/Area	Associated PCS(s)	Footage	PID Screening Locations	(Y/N)	Samples (Y/N)	(Y/N)	(Y/N)	Samples (Y/N)
1	Auto Transformer	1-1							
	Former Spare Main Transformer	1-2							
2	99 kV Distribution Transformer	2-1							
	Keene Line Breaker	2-2							
	Bus Line Breaker	2-3							
	Coolidge Line Breaker	2-4							
3	Former South Warehouse								
	Former 1,000-gallon Gasoline/Diesel UST	3-3							
	Former 550-gallon Diesel UST	3-4							
	1,000-gallon Diesel AST	3-5							
4	Former North Warehouse			22	Ν	Ν	NA	NA	NA
	Former 500-gallon Waste Oil AST	4-1	No stains noted	l during slab walkdown - F	ID locations part of build	ing survey	NA	NA	NA
	Former 550-gallon Diesel UST	4-3		See Tank Sa	npling		NA	NA	NA
5	Turbine Building								
	12,000-gallon Fuel Oil AST	5-1							
	Former 5,000-gallon Fuel Oil UST	5-2							
	Interior Transformers	5-9							
6	Radwaste Building								
	Radwaste Tanks								
7	3,000-gallon Fuel Oil UST	7-1							
	Former 75,000-gallon Fuel Oil AST	7-2							
	9,600-gallon Diesel AST	7-3							
	1,000-gallon Gasoline AST	7-4							
	Former 500-gallon Waste Oil AST	7-5							
	275-gallon Fuel Oil AST	7-6							
8	Vernon Hydro Tie Transformer	8-1							
	COB Transformer	8-2							
	Administrative Building Transformer	8-3							
	PSB Transformer	8-4							
	Cooling Towers East Transformer	8-5							
	Cooling Towers West Transformer	8-6							
	Main Transformer	8-7							
	Auxiliary Transformer	8-8							
	Start-Up Transformer T-3A	8-9							
	Start-Up Transformer T-3B	8-10							
9	Intake Structure								
	Discharge Structure								

			Sampling Basis Per Removed Structure						
			Approximate Square		Elevated PID Readings	Analytical	Walkdov		
AOC	Structure/Area	Associated PCS(s)	Footage	PID Screening Locations	(Y/N)	Samples (Y/N)			
	Chemical Addition Building		U						
10	Main Parking Lot	10-1							
	PSB Parking Lot	10-2							
	Overflow Parking Lot	10-3							
11	Hazardous Materials Short-Term Storage Area	11-1							
	Former Universal Waste Storage Area	11-2							
	Universal Waste Storage Area	11-3							
12	Edson's Garage Structure								
	Former Gasoline USTs	12-1							
	275-gallon Fuel Oil AST	12-5							
13	Main Septic System	13-1							
	New Warehouse Septic	13-2							
	COB Septic	13-3							
14	North SW System and Outfall	14-1							
	South SW System and Outfall	14-2							
	Southeast SW System and Outfall	14-3							
	345 kV SW System and Outfall	14-4							
	115 kV SW System and Outfall	14-5							
	VELCO SW System and Outfall	14-6							
15	East Cooling Tower								
	West Cooling Tower								
NA	Reactor Building								
	Administrative Building								
	Salt Shed								
	Dog House								
	Nitrogen Facility								
	Gatehouse 1								
	Gatehouse 2								
	Drum Storage Building								
	Rotor Storage								
	PSB								
	AOG								
	САВ								
	СОВ								
	Rail Lines								
	ISFSI								
	CST								
	DWST								
	Stack								
				1					

Sampling Basis Per Remaining Structure								
n Completed Y/N)	Stained Areas Noted (Y/N)	Analytical Samples (Y/N)						

			Sampling Basis Per Removed Structure				Sampling Basis Per Remaining Structure			
			Approximate Square		Elevated PID Readings	Analytical	Walkdown Completed	Stained Areas Noted	Analytical	
AOC	Structure/Area	Associated PCS(s)	Footage	PID Screening Locations	(Y/N)	Samples (Y/N)	(Y/N)	(Y/N)	Samples (Y/N)	
Notes:										
Gray shaded areas have been completed.										

			Sampling Basis Per Tank and Extent of Fuel Oil Lines					
			AST/UST Samples	Fuel Oil Lines			PID Screening	Notes
AOC	Structure/Area	Associated PCS(s)	Collected	Present (Y/N)	Linear Extent	Areal Extent	Locations	
1	Auto Transformer	1-1						
	Former Spare Main Transformer	1-2						1
2	99 kV Distribution Transformer	2-1						
	Keene Line Breaker	2-2						
	Bus Line Breaker	2-3						
	Coolidge Line Breaker	2-4						
3	Former South Warehouse							
	Former 1,000-gallon Gasoline/Diesel UST	3-3						
	Former 550-gallon Diesel UST	3-4						
	1,000-gallon Diesel AST	3-5						
								Removed Novem
4	Former North Warehouse		NA	NA	NA	NA	NA	2016
	Former 500-gallon Waste Oil AST	4-1	NA	N	NA	NA	NA	
			EXNW01					
			EXNW02					Tank slab remov
	Former 550-gallon Diesel UST	4-3	EXNW03	Y	10 ft	NA	12	April 2017
5	Turbine Building							
	12,000-gallon Fuel Oil AST	5-1						
	Former 5,000-gallon Fuel Oil UST	5-2						
	Interior Transformers	5-9						
6	Radwaste Building							
	Radwaste Tanks							
7	3,000-gallon Fuel Oil UST	7-1						
	Former 75,000-gallon Fuel Oil AST	7-2						
	9,600-gallon Diesel AST	7-3						
	1,000-gallon Gasoline AST	7-4						
	Former 500-gallon Waste Oil AST	7-5						
	275-gallon Fuel Oil AST	7-6						
8	Vernon Hydro Tie Transformer	8-1						
	COB Transformer	8-2						
	Administrative Building Transformer	8-3						
	PSB Transformer	8-4						
	Cooling Towers East Transformer	8-5						
	Cooling Towers West Transformer	8-6						
	Main Transformer	8-7						
	Auxiliary Transformer	8-8						
	Start-Up Transformer T-3A	8-9						
	Start-Up Transformer T-3B	8-10						
9	Intake Structure							
	Discharge Structure							



			Sampling Basis Per Tank and Extent of Fuel Oil Lines					
			AST/UST Samples	Fuel Oil Lines			PID Screening	Notes
AOC	Structure/Area	Associated PCS(s)	Collected	Present (Y/N)	Linear Extent	Areal Extent	Locations	
	Chemical Addition Building							
10	Main Parking Lot	10-1						
-	PSB Parking Lot	10-2						
	Overflow Parking Lot	10-3						
11	Hazardous Materials Short-Term Storage Area	11-1						
	Former Universal Waste Storage Area	11-2						
	Universal Waste Storage Area	11-3						
12	Edson's Garage Structure							
	Former Gasoline USTs	12-1						
	275-gallon Fuel Oil AST	12-5						
13	Main Septic System	13-1						
	New Warehouse Septic	13-2						
	COB Septic	13-3						
14	North SW System and Outfall	14-1						
	South SW System and Outfall	14-2						
	Southeast SW System and Outfall	14-3						
	345 kV SW System and Outfall	14-4						
	115 kV SW System and Outfall	14-5						
	VELCO SW System and Outfall	14-6						
15	East Cooling Tower							
	West Cooling Tower							
NA	Reactor Building							
	Administrative Building							
	Salt Shed							
	Dog House							
	Nitrogen Facility							
	Gatehouse 1							
	Gatehouse 2							
	Drum Storage Building							
	Rotor Storage							
	PSB							
	AOG							
	САВ							
	СОВ							
	Rail Lines							
	ISFSI							
	CST							
	DWST							
	Stack							
								1



		Sampling Basis Per Tank and Extent of Fuel Oil Lines						
			AST/UST Samples	Fuel Oil Lines			PID Screening	Notes
AOC	Structure/Area	Associated PCS(s)	Collected	Present (Y/N)	Linear Extent	Areal Extent	Locations	
Notes:								
Gray shaded areas have been completed.								

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FIGURES





LEGEND



ABOVE-GRADE STRUCTURE HAS BEEN DEMOLISHED AND REMOVED FROM SITE-SLAB/FOUNDATION STILL IN PLACE

STRUCTURE DEMOLITION HAS COMMENCED

NOTES

1. ALL LOCATIONS ARE APPROXIMATE.

2. AERIAL IMAGERY SOURCE: GOOGLE, OCTOBER 2018



150 SCALE IN FEET

VERMONT YANKEE NUCLEAR POWER STATION 320 GOVERNOR HUNT ROAD VERNON, VERMONT

CURRENT SITE CONDITIONS CIRCA 31 AUGUST 2020

SEPTEMBER 2020