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TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

TRANSMITTAL: LISTED BELOW ARE NEW/REVISED PROCEDURES WHICH MUST BE IMMEDIATELY INSERTED INTO OR DISCARDED FROM YOUR PROCEDURE MANUAL.

Action Required	Section or Description
REMOVE AND DESTROY	EI-1, R/32, ENTIRE PROCEDURE
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SIGN, DATE, AND RETURN THE ACKNOWLEDGEMENT FORM WITHIN 10 DAYS TO THE PALISADES PLANT DOCUMENT CONTROL.

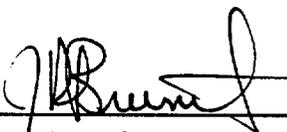
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PALISADES NUCLEAR PLANT
EMERGENCY IMPLEMENTING PROCEDURE

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS


_____, 3/13/00
Procedure Sponsor Date

BNYoung, 2/18/00

Technical Reviewer Date

DJFitzgibbon, 3/4/00

User Reviewer Date

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

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ATTACHMENTS

Attachment 1, "Site Emergency Plan Classification"
Attachment 2, "Emergency Actions/Notifications"

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

USER ALERT

REFERENCE USE PROCEDURE

Refer to the procedure periodically to confirm that all procedure segments of an activity will be or are being performed. Where required, sign appropriate sign-off blanks to certify that all segments are complete.

1.0 PERSONNEL RESPONSIBILITIES

- 1.1 The Shift Supervisor shall implement this procedure and assume the title and responsibilities of the Site Emergency Director (SED) until relieved by Plant Management identified below.

Responsibilities of the Site Emergency Director can be found in Emergency Implementing Procedure EI-2.1, "Site Emergency Director."

- 1.2 The normal line of succession for the SED shall conform to the individuals as listed in the Delegation of Responsibility memo published by the General Manager - Plant Operations. The succession of Delegation of Responsibility is required by CTS - Technical Specification, Section 6.1 {ITS - Improved Technical Specifications Admin 5.1.1}.

For backshifts or weekends, the Duty and Call Superintendent assumes the role of the General Manager - Plant Operations.

2.0 PURPOSE

To classify those emergency conditions that necessitate the activation to the Site Emergency Plan. To identify actions that should be taken to mitigate the consequences of an emergency.

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

3.0 REFERENCES

3.1 SOURCE DOCUMENTS

- 3.1.1 Emergency Operating Procedure EOP-2.0, "Reactor Trip Recovery"
- 3.1.2 Emergency Operating Procedure EOP-3.0, "Station Blackout Recovery"
- 3.1.3 Emergency Operating Procedure EOP-5.0, "Steam Generator Tube Rupture"
- 3.1.4 Emergency Operating Procedure EOP-6.0, "Excess Steam Demand Event"
- 3.1.5 Emergency Operating Procedure EOP-7.0, "Loss of All Feedwater"
- 3.1.6 Emergency Operating Procedure EOP-8.0, "Loss of Offsite Power/Forced Circulation Recovery"
- 3.1.7 NUREG 0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Section D
- 3.1.8 Palisades Site Emergency Plan

3.2 REFERENCE DOCUMENTS

- 3.2.1 Emergency Implementing Procedure EI-2.1, "Site Emergency Director"
- 3.2.2 Emergency Implementing Procedure EI-2.2, "Emergency Staff Augmentation"
- 3.2.3 Emergency Implementing Procedure EI-3, "Communications and Notifications"
- 3.2.4 Emergency Implementing Procedure EI-5.0, "Reentry"
- 3.2.5 Emergency Implementing Procedure EI-5.1, "Recovery"
- 3.2.6 Emergency Implementing Procedure EI-6.0, "Offsite Dose Calculation and Recommendations for Protective Actions"

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- 3.2.7 Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations"
- 3.2.8 Emergency Implementing Procedure EI-7.0, "Emergency Post Accident Sampling Decision Process"
- 3.2.9 Emergency Implementing Procedure EI-8, "Onsite Radiological Monitoring"
- 3.2.10 Emergency Implementing Procedure EI-9, "Offsite Radiological Monitoring"
- 3.2.11 Emergency Implementing Procedure EI-10, "Accident Environmental Assessment"
- 3.2.12 Emergency Implementing Procedure EI-11, "Determination of Extent of Core Damage"
- 3.2.13 Emergency Implementing Procedure EI-12.1, "Personnel Accountability and Assembly"
- 3.2.14 Emergency Implementing Procedure EI-13, "Evacuations/Reassembly"
- 3.2.15 Emergency Operating Procedure EOP-4.0, "Loss of Coolant Accident Recovery"
- 3.2.16 Emergency Operating Procedure EOP-9.0, "Functional Recovery Procedure"
- 3.2.17 Palisades Administrative Procedure 3.03, "Corrective Action Process"
- 3.2.18 Palisades Administrative Procedure 4.00, "Operations Organization"
- 3.2.19 Off Normal Procedure ONP-23.1, "Primary Coolant Leak"
- 3.2.20 Off Normal Procedure ONP-23.2, "Steam Generator Tube Leak"
- 3.2.21 System Operating Procedure SOP-34, "Plant Process Computer (PPC) System"
- 3.2.22 Palisades Oil and Hazardous Materials Spill Prevention Plan

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| 3.2.23 CTS - Technical Specifications, Section 6.1
| {ITS - Improved Technical Specifications Admin 5.5.1}

3.2.24 Palisades Offsite Dose Calculation Manual

3.2.25 Fire Protection Implementing Procedures

3.2.26 Severe Accident Management Guidelines

| 3.2.27 10CFR50.54(x)

4.0 **INITIAL CONDITIONS AND/OR REQUIREMENTS**

This procedure shall be implemented any time an event occurs or conditions exist which, in the opinion of the Shift Supervisor/SED, may require activation of the Site Emergency Plan (SEP).

OR

When events occur or conditions exist after the activation of the SEP that, in the opinion of the SED, may require reclassification, either upgrading or downgrading.

5.0 **PRECAUTIONS AND LIMITATIONS**

Safeguards Contingency Procedures shall be activated if, during event response, signs of tampering, sabotage or other items of suspicious nature are indicated, or if the event affects security systems, ie, loss of detection systems, loss of communications, etc.

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

6.0 EMERGENCY CLASSIFICATION

USER ALERT
REFERENCE USE PROCEDURE

Refer to the procedure periodically to confirm that all procedure segments of an activity will be or are being performed. Where required, sign appropriate sign-off blanks to certify that all segments are complete.

6.1 CLASSIFICATION/RECLASSIFICATION

- a. Emergencies are grouped into four classifications listed below in order of severity:

Unusual Event

Events are in process or have occurred which indicate a potential degradation of the level of safety of the Plant. Unusual Events involve minor situations that have the potential to escalate to more serious emergencies.

Alert

Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the Plant. The consideration is, as in an Unusual Event, to prepare to cope with potentially more serious emergencies. Alerts may involve releases of radioactivity limited to small fractions of the EPA Protective Guidelines.

Site Area Emergency

Events are in process or have occurred which involve actual or likely major failures of Plant functions needed for protection of the public. The potential for a situation hazardous to the general public is the major concern during a Site Area Emergency. Any releases are not expected to exceed EPA Protective Action Guidelines except near site boundary.

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

General Emergency

Events are in process or have occurred which involve actual or imminent core degradation with the potential for loss of containment integrity {ITS - containment operable per LCO 3.6.1}. Releases can reasonably be expected to exceed EPA Protective Action Guidelines exposure levels offsite for more than the immediate site area.

b. The SED shall classify emergency conditions/events as follows:

1. Determine the category that conditions/events best fit from the list of keywords below:

Alarms/Annunciators - Attach 1, Pg 1
Communication Loss - Attach 1, Pg 2
Dry Fuel Storage Cask-ISFSI - Attach 1, Pg 3
Engineered Safety Features - Attach 1, Pg 4
Evacuation - Control Room - Attach 1, Pg 6
Fire - Attach 1, Pg 7
Fission Product Barriers/Fuel Damage - Attach 1, Pg 8
Hazards - General - Attach 1, Pg 10
Miscellaneous - Attach 1, Pg 13
Natural Phenomenon - Attach 1, Pg 15
Plant Power - Electrical - Attach 1, Pg 17
Primary Coolant System Integrity - Attach 1, Pg 19
Primary Coolant System - Temperature or Pressure - Attach 1, Pg 23
Radiation Levels - Attach 1, Pg 24
Releases - Attach 1, Pg 25
Safety Injection System - Attach 1, Pg 29
Secondary Side - Attach 1, Pg 30
Security - Attach 1, Pg 31

2. Use the keyword identified above and Attachment 1, "Site Emergency Plan Classification," to classify the conditions/event.

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

6.2 DETERMINATION OF EMERGENCY ACTIONS/NOTIFICATIONS

NOTE: The SED may assign a person to complete Attachment 2, "Emergency Actions/Notifications."

- a. The numbers in the right hand column of Attachment 1 (Site Emergency Plan Classification) identify actions that should be performed for each emergency. These numbers relate to the Actions/Notifications listed in Attachment 2 of this procedure.
- b. Each action may be categorized as either:
 1. Mandatory Actions (M) - Actions that shall be performed within one hour of the declaration of the emergency.
 - OR
 2. Subsequent Actions (S) - Actions that should be performed in an expeditious manner as conditions, time, and personnel permit.
 - OR
 3. If Needed Actions (I) - Actions that are not required in every case, but may be needed.
- c. Using the "Action" column of Attachment 2, circle each action as M (Mandatory), S (Subsequent), or I (If Needed).
- d. Each action on Attachment 2 should be initialed when the action is completed.

7.0 ATTACHMENTS

7.1 Attachment 1, "Site Emergency Plan Classification"

7.2 Attachment 2, "Emergency Actions/Notifications"

SITE EMERGENCY PLAN CLASSIFICATION

ALARMS/ANNUNCIATORS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Alert	Loss of most or all alarms (annunciators) in Control Room, eg, loss of DC Panel D 21-2.	Observation CTS-(Plant not at power). {ITS - (Modes 3,4,5 and 6)}.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: None
Site Area Emergency	Loss of most or all alarms (annunciators) in Control Room <u>AND</u> Plant transient initiated or in progress.	Observation CTS-(Plant at power <u>OR</u> shutdown with transient in progress). {ITS - (Modes 1 and 2 <u>OR</u> Modes 3,4,5 and 6 with transient in progress)}.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 22, 23 If Needed: 19, 20, 21

SITE EMERGENCY PLAN CLASSIFICATION

COMMUNICATION LOSS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Significant loss of offsite communication capability. NOTE: For failures of the Palisades Public Warning System, see Palisades Administrative Procedure 4.00, "Operations Organization, Responsibilities and Conduct," Section 5.5.	Loss of the Emergency Notification System (ENS), and all other phones including satellite phones, that could be used to make notifications to Van Buren County, the State of Michigan and the NRC. NOTE: The availability of one phone is sufficient to inform offsite authorities of plant problems.	Mandatory: 1, 3, 4, 6, 7, 12 Subsequent: 15, 23 If Needed: None

SITE EMERGENCY PLAN CLASSIFICATION

DRY FUEL STORAGE CASK-ISFSI

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Incident involving a loaded fuel storage cask outside the Auxiliary Building.	<p>Radiation level ≥ 1 rem/hr at 1 ft from a Dry Fuel Storage Cask.</p> <p style="text-align: center;"><u>OR</u></p> <p>Radioactive contamination level 10^5 dpm/100cm² beta-gamma or 10^3 dpm/100cm² alpha from a Dry Fuel Storage Cask.</p> <p style="text-align: center;"><u>OR</u></p> <p>Airborne radioactivity analysis indicating ≥ 10 times the Effluent Concentration levels from a Dry Fuel Storage Cask. (10CFR20, Appendix B, Table 2)</p> <p style="text-align: center;"><u>OR</u></p> <p>SED opinion based on direct observation that containment/shielding of a Dry Fuel Storage Cask has been degraded due to an operational event (cask drop, missile impact, etc).</p>	<p>Mandatory: 1, 3, 4, 6, 7</p> <p>Subsequent: 15, 23</p> <p>If Needed: 11, 13, 14</p>

SITE EMERGENCY PLAN CLASSIFICATION

ENGINEERED SAFETY FEATURES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Reactor Protective System failure requiring manual Reactor Trip to insert control rods.	RPS input failure <u>AND</u> Reactor manually tripped <u>AND</u> Reactor power lowering <u>AND</u> maximum of one (1) full length CRD not fully inserted.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: None
Alert	Failure of Reactor Protection System to initiate and complete a trip <u>AND</u> the Reactor is not subcritical.	Rx Trip initiated <u>AND</u> any full length CRD not inserted <u>AND</u> Rx power not lowering <u>AND</u> Rx power greater than 10 ⁻⁴ %.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: 12, 19, 21
	Complete loss of any functions needed for Plant cold shutdown. {ITS - Improved Technical Specifications Mode 5}	Both S/Gs are not available for PCS heat removal <u>AND</u> uncontrolled PCS heatup is in progress <u>AND</u> PCS temperature will exceed CTS - 200°F {ITS - Mode 5} in the next hour (use actual heatup rate if available).	
	Complete loss of Auxiliary Feedwater System (not applicable when PCS ≤ 300°F.	All AFW pumps/trains not available <u>AND</u> Main Feedwater/Condensate is in service.	
Site Area Emergency	Complete loss of any function needed for hot shutdown. {ITS - Improved Technical Specifications Mode 3}	All AFW pumps/trains not available for less than 30 minutes <u>AND</u> Rx trip not initiated <u>AND</u> Main Feedwater/Condensate <u>NOT</u> in service.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 22, 23, 24 If Needed: 12, 13, 19, 20, 21
	Transient requiring operation of shutdown systems with failure to trip (continued power generation, but no core damage immediately evident).	RPS setpoints exceeded <u>AND</u> Rx trip not initiated <u>AND</u> Rx power not decreasing <u>AND</u> Rx power greater than CTS - 2% {ITS - 5%}.	

SITE EMERGENCY PLAN CLASSIFICATION

ENGINEERED SAFETY FEATURES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
General Emergency	Transient requiring operation of shutdown system with failure to trip which results in core damage or additional failure of core cooling and makeup systems (which could lead to core melt).	Rx Trip initiated <u>AND</u> any full length CRD <u>NOT</u> inserted <u>AND</u> Rx power increasing or stable <u>AND</u> Rx power greater than CTS - 1% {ITS - 5%} <u>AND</u> less than 25°F subcooled <u>OR</u> failed Fuel Monitor (RIA-0202) off scale high, confirmed by sample analysis.	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17, 19, 21, 22, 23, 24 If Needed: 12, 20
	Transient initiated by loss of Feedwater and Condensate System (principal heat removal system), followed by failure of Auxiliary Feedwater System for an extended period. Core melting possible in several hours.	Rx trip initiated by loss of Main Feedwater <u>AND</u> all AFW pumps/trains not available for greater than 30 minutes <u>AND</u> Main Feedwater/Condensate <u>NOT</u> in service.	

SITE EMERGENCY PLAN CLASSIFICATION

EVACUATION, CONTROL ROOM

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Alert	Evacuation of Control Room anticipated or required with control of shutdown systems established at local stations.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: 12
Site Area Emergency	Evacuation of Control Room and control of shutdown systems not established at local stations within 15 minutes.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 22, 23, 24 If Needed: 12, 13, 19, 20, 21

SITE EMERGENCY PLAN CLASSIFICATION

FIRE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Fire within the Plant lasting more than 10 minutes.	Observation <u>OR</u> Fire detection alarm, confirmed by observation.	Mandatory: 1, 3, 4, 6, 7, 16 Subsequent: 15, 23 If Needed: 12, 18
Alert	Fire potentially affecting safety systems.	Fire can potentially disable equipment which will result in jeopardizing safety function(s) <u>OR</u> SED opinion.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 16 Subsequent: 15, 22, 23 If Needed: 12, 18
Site Area Emergency	Fire compromising the function of safety systems.	Fire has disabled equipment resulting in jeopardized safety function(s).	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15, 16 Subsequent: 17, 22, 23 If Needed: 12, 18, 19, 20, 21

NOTE: See General Emergency classification under the Miscellaneous category for a fire which could cause massive damage to Plant systems.

SITE EMERGENCY PLAN CLASSIFICATION

FISSION PRODUCT BARRIERS/FUEL DAMAGE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Primary Coolant Iodine-131 dose concentration equivalent > 1.0 μ Ci/gm for more than CTS - 72 hrs {ITS - 48 hrs} <u>OR</u> > 0.1% increase in failed fuel within 30 minutes.	Failed Fuel Monitor (RIA-0202) Alarm confirmed by sample analysis.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: None
Alert	Primary Coolant Iodine-131 dose equivalent concentration CTS - > 25 μ Ci/gm {ITS - > 40 μ Ci/gm} <u>OR</u> > 1% increase in failed fuel within 30 minutes <u>OR</u> 5% total failed fuel.	Failed Fuel Monitor (RIA-0202) off scale high, confirmed by sample analysis.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 19, 22, 23 If Needed: 12, 13, 14
	Fuel damage/handling accident with release of radioactivity to Containment or Auxiliary Building. *	Radiation Monitor Alarm confirmed after observation of accident <u>OR</u> observation of accident, confirmed by sample analysis <u>OR</u> SED's opinion.	

*For incidents involving Dry Fuel Storage Casks outside the Auxiliary Building. See Dry Fuel Storage Cask-ISFSI classification, page 3 of 31.

SITE EMERGENCY PLAN CLASSIFICATION

FISSION PRODUCT BARRIERS/FUEL DAMAGE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Site Area Emergency	Major damage to irradiated fuel in Containment or Fuel Handling Building (eg, large object damages fuel or water loss below fuel level).	Radiation Monitor Alarm confirmed after observation of accident <u>OR</u> confirmed by sample analysis <u>OR</u> SED's opinion.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 13, 17, 19, 21, 22, 23, 24
	Degraded core with possible loss of coolable geometry.	Core exit temperature > 700°F <u>OR</u> subcooling margin < 0°F <u>OR</u> Core uncovered <u>AND</u> temperature rise across the core increasing <u>OR</u> lack of temperature rise across the core <u>OR</u> SED's opinion.	If Needed: 12, 20
General Emergency	Loss of 2 of 3 fission product barriers with potential loss of third fission product barrier (eg, loss of Primary Coolant integrity, clad failure, and high potential for loss of Containment).	Detection dependent upon which barriers fail and to some extent, upon mechanism which causes failure. Potential loss of Containment is defined as Containment Hydrogen Concentration > 4.0% <u>AND</u> Containment pressure > 70 PSIA, <u>OR</u> SED's opinion.	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17, 19, 21, 22, 23, 24 If Needed: 12, 20

SITE EMERGENCY PLAN CLASSIFICATION

HAZARDS-GENERAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Aircraft crash onsite or unusual aircraft activity over facility which could affect Plant operation. NOTE: Onsite is defined as the Owner Controlled Area outside of the Protected Area, not including structures.	Observation of event <u>AND</u> SED's opinion.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: 12, 18
	Near or onsite explosion which could affect Plant operation.	Observation of event <u>OR</u> notification from offsite authorities <u>AND</u> SED's opinion.	
	Near or onsite toxic or flammable gas which could affect Plant operation. NOTE: Refer to the Oil and Hazardous Materials Spill Prevention Plan.	Observation of event <u>OR</u> notification from offsite authorities <u>AND</u> SED's opinion.	

SITE EMERGENCY PLAN CLASSIFICATION

HAZARDS-GENERAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Alert	Aircraft crash on facility. NOTE: Facility is defined as nonvital structures inside and outside of the Protected Area.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23
	Missile impact from whatever source on facility.	Observation.	If Needed: 12, 16, 18
	Known explosion damage to facility affecting Plant operation.	Observation.	
	Entry into facility environs of uncontrolled toxic or flammable gas which does affect Plant operation. NOTE: Refer to the Oil and Hazardous Materials Spill Prevention Plan.	Observation <u>OR</u> warning from offsite authorities <u>OR</u> detection with portable instrumentation <u>AND</u> SED's opinion.	

SITE EMERGENCY PLAN CLASSIFICATION

HAZARDS-GENERAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Site Area Emergency	Aircraft crash affecting Vital structures by impact or fire <u>AND</u> Plant not in CTS - cold shutdown {ITS - Mode 5 or 6}.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 22, 23, 24
	Severe damage to equipment required for safe shutdown from missiles or explosion.	Observation.	If Needed: 12, 13, 16, 18, 19, 20, 21
	Entry of uncontrolled flammable gas into Vital areas <u>OR</u> entry of uncontrolled toxic gas into Vital areas that constitute a safety problem <u>AND</u> Plant not in CTS-cold shutdown {ITS-Mode 5 or 6}	Observation <u>OR</u> SED's opinion <u>OR</u> detection with portable instrumentation.	

SITE EMERGENCY PLAN CLASSIFICATION

MISCELLANEOUS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Plant conditions exist that warrant increased awareness on the part of the Plant staff or state and/or local authorities <u>OR</u> inability to reach required shutdown within Technical Specification requirements. NOTE: For Rx trips from high PCS pressure (initiating event), see "Primary Coolant System Temperature or Pressure" category. For coolant radioactivity exceeding Technical Specifications, see "Fission Product Barriers/Fuel Damage."	SED's opinion	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: 12
Alert	Plant conditions exist that warrant precautionary activation of Technical Support Center and placing Emergency Operations Facility and other emergency personnel on standby.	SED's opinion <u>OR</u> when 10CFR50.54(x) is invoked.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: 12
Site Area Emergency	Plant conditions warrant the activation of emergency center and monitoring teams or a precautionary notification to the public near the site.	SED's opinion <u>OR</u> continued power operation outside the Plant's licensed basis, when 10CFR50.54(x) is invoked.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 22, 23, 24 If Needed: 12, 13, 19, 20, 21

SITE EMERGENCY PLAN CLASSIFICATION

MISCELLANEOUS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
General Emergency	Conditions exist that make release of large amounts of radioactivity in a short time possible (eg, any core melt situation).	SED's opinion.	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17, 19, 21, 22, 23, 24
	Any major internal or external events (eg, fires, earthquakes, substantially beyond design basis) which could cause massive common damage to Plant systems.	SED's opinion.	If Needed: 12, 16, 18, 20

SITE EMERGENCY PLAN CLASSIFICATION

NATURAL PHENOMENON

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Any earthquake felt in-Plant or detected on station seismic instrumentation which does NOT cause damage to Plant equipment or structures.	Observation (see Note ¹), or measurement (see Note ²).	Mandatory: 1, 3, 4, 6, 7
	Abnormal water levels including flood or low water or seiche.	Flood, seiche - observation of water approaching 590' level. Low water - Ultimate Heat Sink level lowers to $\leq 572'0"$ (216" below Intake Structure floor level)	Subsequent: 15, 23
	Tornado onsite.	Observation	If Needed: 12
Alert	Any earthquake that exceeds operating base earthquake surface acceleration levels of 0.1G, but not greater than 0.2G; no damage to equipment required for safe shutdown.	Observation (see Note ¹), or measurement (see Note ²).	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11
	Flood, low water, or seiche near design basis.	Flood, seiche - observation of water above 590' level. Low water - Ultimate Heat Sink level lowers to $\leq 568'3"$ (261" below Intake Structure floor level)	Subsequent: 15, 22, 23
	Tornado striking facility. NOTE: Facility is defined as nonvital structures inside and outside of the Protected Area.	Observation	If Needed: 12, 16, 18

NOTE¹: Information on seismic disturbances can be obtained by calling the National Earthquake Information Center, Denver Colorado, at 1-303-273-8500

NOTE²: Seismic instrumentation is available onsite for post emergency assessment of earthquakes. There are 4 peak recording accelerometers located in Containment on elevations 590', 607', 625', and 649'; these accelerometers require offsite analysis. One strong motion accelerometer is located in the switchyard battery room; this accelerometer is capable of onsite PC analysis. Surveillance checks on these instruments are performed by the I&C Department.

SITE EMERGENCY PLAN CLASSIFICATION

NATURAL PHENOMENON

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Site Area Emergency	Any earthquake that exceeds safe shutdown earthquake surface acceleration levels or 0.2G.	Measurement. (See Note ² Page 15)	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 22, 23
	Any earthquake that is of sufficient magnitude to cause damage to equipment and structures needed to safely shut down the Plant.	Observation. (See Note ¹ Page 15)	If Needed: 12, 13, 16, 18, 19, 20, 21
	Flood, low water, or seiche greater than design levels <u>OR</u> failure of protection of Vital equipment at lower levels.	Flood, seiche - observation of water above 594' level. Low water - Ultimate Heat Sink level lowers to $\leq 565'9"$ (291" below Intake Structure floor level) Others - observation of equipment damage.	
	Tornado or sustained winds in excess of design level; ie, of sufficient magnitude to cause damage to equipment and structures needed to safely shut down the Plant.	Observation. Notification by offsite agencies.	

NOTE: For earthquakes substantially beyond Design Basis, see "Miscellaneous" category under General Emergency classification.

SITE EMERGENCY PLAN CLASSIFICATION

PLANT POWER - ELECTRICAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Both Station Batteries not available.	Both battery breakers open for greater than one hour <u>AND</u> DC Bus #1 <u>AND</u> #2 Low Voltage Alarms <u>NOT</u> alarming <u>AND</u> PCS temperature greater than CTS - 200°F {ITS - Mode 5}.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: 12
	Loss of offsite AC power.	Loss of all qualified circuits from offsite <u>AND</u> onsite power is being supplied by diesel generator(s).	
	Loss of emergency onsite AC power.	Both Emergency Diesel Generators inoperable for greater than two hours <u>AND</u> PCS temperature is greater than CTS-200°F {ITS - Mode 5}.	
Alert	Loss of offsite <u>AND</u> onsite AC power for less than 15 minutes.	Bus 1C <u>AND</u> 1D low voltage alarms.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: 12
	Loss of all onsite DC power.	DC Bus D11A <u>AND</u> D21A de-energized <u>OR</u> both DC Bus voltages less than 105V.	
Site Area Emergency	Loss of offsite <u>AND</u> onsite AC power for more than 15 minutes.	Bus 1C <u>AND</u> 1D low voltage alarms.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 22, 23 If Needed: 12, 13, 19, 20, 21
	Loss of all vital onsite DC power for more than 15 minutes, <u>AND</u> Plant not in CTS-cold shutdown {ITS-Mode 5 or 6}.	DC Bus D11A <u>AND</u> D21A deenergized <u>OR</u> both DC Bus voltages less than 105V.	

NOTE: The SED should direct the Engineering Support Team and Operations Support Team to evaluate the need to recommend and implement fuel oil conservation measures in the event offsite power has been lost.

SITE EMERGENCY PLAN CLASSIFICATION

PLANT POWER - ELECTRICAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
General Emergency	Loss of offsite and onsite AC power AND total loss of auxiliary feedwater makeup capability for an extended period.	Bus 1C AND 1D low voltage alarms AND all AFW pumps/trains not available for greater than 30 minutes AND Main Feedwater not in service.	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17, 19, 21, 22, 23, 24 If Needed: 12, 20

NOTE: The SED should direct the Engineering Support Team and Operations Support Team to evaluate the need to recommend and implement fuel oil conservation measures in the event offsite power has been lost.

SITE EMERGENCY PLAN CLASSIFICATION

PRIMARY COOLANT SYSTEM INTEGRITY

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	PCS leak rate in excess of Technical Specifications, but < 50 gpm.	Calculation, <u>OR</u> implementation of Off Normal Procedure ONP-23.1, "Primary Coolant Leak," <u>OR</u> SED opinion that leak rate indications warrant activation of Emergency Plan.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: None
	Steam Generator secondary water activity > 0.1 μ Ci/gm dose equivalent I-131.	S/G sample analysis.	
	Primary to secondary leakage rate exceeds Technical Specifications limits, but < 50 gpm.	Calculation, <u>OR</u> implementation of Off Normal Procedure ONP-23.2, "Steam Generator Tube Leak."	

SITE EMERGENCY PLAN CLASSIFICATION

PRIMARY COOLANT SYSTEM INTEGRITY

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Alert	PCS leak rate or primary to secondary leak rate > 50 gpm, but less than charging pump capacity.	Observation of excessive PCS leakage conditions.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23
	Primary to secondary leak rate < 50 gpm <u>AND</u> steam line break inside or outside Containment.	Observation of Steam Generator tube leak or rupture conditions <u>AND</u> observation of excess steam demand event inside or outside Containment.	If Needed: None
<p>NOTE: For incidents involving loss of Primary Coolant System Integrity <u>AND</u> loss of a second fission product barrier <u>AND</u> potential loss of the third fission product barrier, see FISSION PRODUCT BARRIER/FUEL DAMAGE under General Emergency classification.</p>			

SITE EMERGENCY PLAN CLASSIFICATION

PRIMARY COOLANT SYSTEM INTEGRITY

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Site Area Emergency	PCS leak rate or primary to secondary leak rate greater than charging pump capacity.	Observation of LOCA or Steam Generator tube rupture conditions.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15
	Primary to secondary leakage rate less than charging pump capacity <u>AND</u> loss of offsite power.	Observation of Steam Generator tube rupture conditions <u>AND</u> loss of Startup transformers and Safeguards transformer.	Subsequent: 13, 17, 22, 23, 24 If Needed: 19, 20, 21
	Primary to secondary leak rate > 50 gpm <u>AND</u> steam line break outside Containment and downstream from MSIVs <u>AND</u> indication of fuel damage.	Observation of Steam Generator tube leak/rupture conditions <u>AND</u> observation of excess steam demand events outside Containment and downstream from MSIVs <u>AND</u> failed Fuel Monitor (RIA-0202) off scale high.	
<p><u>NOTE:</u> For incidents involving loss of Primary Coolant System Integrity <u>AND</u> loss of a second fission product barrier <u>AND</u> potential loss of the third fission product barrier, see FISSION PRODUCT BARRIER/FUEL DAMAGE, under General Emergency classification.</p>			

SITE EMERGENCY PLAN CLASSIFICATION

PRIMARY COOLANT SYSTEM INTEGRITY

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
General Emergency	Small and large LOCAs with failure of SIS leading to severe core degradation.	Observation of LOCA conditions <u>AND</u> Safety Injection System flow inadequate (per Emergency Operating Procedure EOP-4.0, "Loss of Coolant Accident Recovery," or EOP-9.0, "Functional Recovery Procedure") <u>AND</u> failed Fuel Monitor (RIA-0202) off scale high.	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17, 19, 21, 22, 23, 24 If Needed: 20
	Small or large LOCA and initially successful Safety Injection System. Subsequent failure of Containment heat removal system over several hours.	Observation of LOCA conditions <u>AND</u> Safety Injection System flow inadequate (per EOP-4.0 or EOP-9.0) <u>AND</u> Containment Atmosphere Control inadequate (per EOP-4.0 or EOP-9.0).	

SITE EMERGENCY PLAN CLASSIFICATION

PRIMARY COOLANT SYSTEM - TEMPERATURE OR PRESSURE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Any challenge to Over-Pressure Protection System (LTOP). NOTE: Momentary PORV activations which occur during PORV Isolation Valve opening shall not be considered as a challenge to the LTOP System.	Annunciation of PORV operation.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: None
	Reactor high-pressure trip. (Initiating event)	Annunciator (RPS alarms) <u>OR</u> event recorder.	
	Pressurizer code safety valve operation.	Observation.	
Alert	PCS temperature < 25°F subcooled.	Observation, <u>AND</u> Plant above CTS - cold shutdown {ITS - Mode 5}.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: None

SITE EMERGENCY PLAN CLASSIFICATION

RADIATION LEVELS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Alert	Radiation levels or airborne contamination indicates a severe degradation in control of radioactive materials.	Radiation monitors increase by a factor of 1000, confirmed <u>OR</u> unexpected Plant area iodine or particulate airborne concentrations > 1000 DAC (per 10CFR20, Appendix B Table 1).	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: 13, 14

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Short term radiological effluent ODCM limits exceeded.	The stack monitor RIA-2326 reaches Alert alarm setpoint for greater than one hour, confirmed by sample analysis, <u>OR</u> Liquid Waste Discharge Monitor (RIA-1049) reaches alarm setpoint and automatic discharge trip function fails. Confirmed by sample analysis.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: 11, 14
	Significant solid or liquid waste spill outside restricted areas with threatened offsite release.	Observation confirmed by survey results <u>OR</u> SED's opinion.	Notify Rad Services to evaluate whether 40CFR302 notifications are necessary.
Alert	Radiological effluent > 10 times the ODCM instantaneous release rate limit.	A valid stack monitor (RIA-2326) reading of $\geq 1.6E+5$ cpm above background for longer than one hour, <u>OR</u> Liquid Waste Discharge Monitor (RIA-1049) reaches 10 times alarm setpoint and automatic discharge trip function fails, confirmed by sample analysis.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 13, 14, 15, 22, 23 If Needed: 19, 20, 21

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
<p>Site Area Emergency</p>	<p>Effluent monitors detect levels corresponding to > 50 mrem/hr TEDE for ½ hour or > 500 mrem/hr TEDE for 2 minutes (or 5 times these levels to the Adult Thyroid CDE) at the site boundary for <u>adverse meteorological conditions</u>. These levels are projected based on other Plant parameters (eg, radiation level in Containment with leak rate appropriate for existing Containment pressure) or are measured in the environs. EPA Protective Action Guidelines (see Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations") are projected to be exceeded outside the site boundary.</p>	<p>1. Any of the following valid Radiation Monitor readings for greater than 30 mins:</p> <ul style="list-style-type: none"> a) RIA-2326 $\geq 1.3E+6$ CPM above background. b) RIA-2323/RIA-2324 ≥ 215 CPM above background <u>AND</u> steam release in progress. c) RIA-2321/RIA-2322 $\geq 5.1E+4$ rem/hr above background <u>AND</u> Containment integrity intact; <u>OR</u> <p>2. Any of the following valid Radiation Monitor readings for greater than 2 minutes:</p> <ul style="list-style-type: none"> a) RIA-2327 ≥ 11 mrem/hr above background. b) RIA-2323/RIA-2324 ≥ 630 CPM above background <u>AND</u> steam release in progress. c) RIA-2321/RIA-2322 $\geq 5.1E+5$ rem/hr above background <u>AND</u> Containment integrity intact; <u>OR</u> 	<p>Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 13, 14, 15</p> <p>Subsequent: 17, 19, 20, 21, 22, 23, 24</p> <p>If Needed:</p> <p>None</p>

Continued on next page

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Site Area Emergency (Cont'd)		3. Measured radiation levels at site boundary indicate any of the following: a) TEDE Rate > 50 mrem/hr for 30 minutes. b) TEDE Rate > 500 mrem/hr for 2 minutes. c) Adult Thyroid CDE Rate > 250 mrem/hr for 30 minutes. d) Adult Thyroid CDE Rate > 2500 mrem/hr for 2 minutes.	

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
<p>General Emergency</p>	<p>Effluent monitors detect levels corresponding to 1 rem/hr TEDE or 5 rem/hr Adult Thyroid CDE Rate at the site boundary under <u>actual meteorological conditions</u>. These levels are projected based on other Plant parameters (eg, radiation levels in Containment with leak rate appropriate for existing Containment pressure) or are measured in the environs.</p> <p>NOTE: Refer to Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations."</p>	<ol style="list-style-type: none"> 1. Any of the following Radiation Monitor readings <u>may</u> indicate a General Emergency: <ol style="list-style-type: none"> a) RIA-2327 \geq 22 mrem/hr above background. b) RIA-2323/RIA-2324 \geq 1260 CPM above background <u>AND</u> main steam release occurring. c) RIA-2321/RIA-2322 \geq 1.OE + 6 rem/hr above background <u>AND</u> Containment leakage within design limits; <u>OR</u> 2. Dose Projection from Emergency Implementing Procedure EI-6.0, "Offsite Dose Calculation and Recommendations for Protective Actions," indicate any of the following with <u>Existing</u> Meteorological Conditions, at or beyond the site boundary: <ol style="list-style-type: none"> a) TEDE Rate \geq 1 rem integrated over a period of one hour. b) Adult Thyroid CDE Rate \geq 5 rem integrated over a period of one hour. 3. Measured radiation levels at or beyond the site boundary indicate any of the following: <ol style="list-style-type: none"> a) TEDE Rate \geq 1 rem integrated over a period of one hour. b) Adult Thyroid CDE Rate \geq 5 rem integrated over a period of one hour. 	<p>Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15,</p> <p>Subsequent: 17, 19, 20, 21, 22, 23, 24</p>

SITE EMERGENCY PLAN CLASSIFICATION

SAFETY INJECTION SYSTEM

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Safety Injection initiated <u>AND</u> discharged to vessel NOTE: Applies to HPSI, LPSI, or SIT Injection only. For injections solely from charging pumps/BA pumps to PCS due to SIS, include as part of one hour (or four hours) nonemergency report per Palisades Administrative Procedure 4.00, "Operations Organization, Responsibilities and Conduct."	Annunciation <u>AND</u> flow verification.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: None

SITE EMERGENCY PLAN CLASSIFICATION

SECONDARY SIDE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Failure of a safety or relief valve in a safety-related system to close following reduction of applicable pressure.	Annunciation <u>AND</u> pressure indications, <u>OR</u> observation.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 23 If Needed: None
	Main Steam Line/Main Feedwater Line break outside Containment which is isolated by Main Steam isolation signal (manually or auto).	Observation of isolated excess Steam Demand Event conditions.	
	Turbine rotating component failure requiring turbine trip.	Turbine trip (other than required for normal Plant shutdown) <u>AND</u> observation of turbine malfunction or failure.	
Alert	Main Steam Line/Main Feedwater Line break inside or outside Containment which is not isolated.	Observation of excess Steam Demand Event conditions.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 22, 23 If Needed: None
	Turbine failure causing casing penetration.	Observation <u>AND</u> turbine trip.	

NOTE: For accidents involving Main Steam Line/Main Feedwater Line breaks and failed Fuel/Steam Generator tube leaks, see "Primary Coolant System Integrity."

NOTE: For accidents involving primary to secondary leakage, see "Primary Coolant System Integrity."

SITE EMERGENCY PLAN CLASSIFICATION

SECURITY

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
Unusual Event	Security threat or attempted entry or attempted sabotage.	Security alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 3, 4, 6, 7, 12 Subsequent: 15, 23 If Needed: None
Alert	Security threat exists that results in adversaries commandeering an area of the Plant, but not control over shutdown capability or of any Vital areas.	Security Alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 2*, 3, 4, 6, 7, 8*, 9*, 10, 11*, 12 Subsequent: 15, 22, 23 If Needed: 15, 19
Site Area Emergency	Physical attack on the Plant involving imminent occupancy of the Control Room, auxiliary shutdown panels, or other Vital areas.	Security alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 2*, 3, 4, 6, 7, 8*; 9*, 10, 11*, 12, 14*, 15 Subsequent: 17*, 22, 23 If Needed: 13, 19, 20, 21
General Emergency	Physical attack on the Plant has resulted in unauthorized personnel occupying the Control Room or any other Vital areas.	Security alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 2*, 3, 4, 5, 6, 7, 8*, 9*, 10, 11*, 12, 13, 14*, 15 Subsequent: 17*, 22, 23, 24 If Needed: 16, 18, 19, 20, 21

***NOTE:** Performance of this action may be delayed until the safety of personnel is assured.

EMERGENCY ACTIONS/NOTIFICATIONS

Proc No EI-1
Attachment 2
Revision 33
Page 1 of 1

EVENT TYPE (Circle one): UE / ALERT / SAE / GENERAL Date: _____

ITEM	ACTION (circle)	DESCRIPTION OF ACTION	REF	DONE?
1	M S I	Announce Emergency on PA	EI-3	
2	M S I	Sound Emergency Siren	EI-3	
3	M S I	Notify Van Buren County (within 15 min of declaration) See Notes 2 and 3 below	EI-3	
4	M S I	Notify State of Michigan (within 15 min of declaration) See Notes 2 and 3 below	EI-3	
5	M S I	Provide Protective Action Recommendation	EI-6.13	
6	M S I	Call Duty and Call Superintendent	N/A	
7	M S I	Notify NRC See Note 1 below	EI-3	
8	M S I	Perform Personnel Accountability - Notify Security at Ext 2278	EI-12.1	
9	M S I	Initiate Staff Augmentation - Notify Security at Ext 2278 See Note 4 below	EI-2.2	
10	M S I	Activate ERDS	SOP-34	
11	M S I	Initiate Onsite Monitoring	EI-8	
12	M S I	Activate Safeguards Contingency Procedures	N/A	
13	M S I	Perform Offsite Dose Assessment	EI-6.0	±
14	M S I	Initiate Offsite Monitoring	EI-9	
15	M S I	Notify Public Affairs - Day @ 764-8931 Night @ 637-5170	EI-3	
16	M S I	Activate Fire Protection Plan	FIPs	
17	M S I	Evacuate Nonessential Personnel	EI-13	
18	M S I	Notify Covert Fire Dept and Call Security @ 2278	EI-3	
19	M S I	Perform Core Damage Calculation	EI-11	
20	M S I	Perform Environmental Assessment	EI-10	
21	M S I	Perform Post Accident Sampling/Analysis	EI-7.0	
22	M S I	Initiate Re-entry/Recovery	EI-5	
23	M S I	Initiate Condition Report	Admin 3.03	
24	M S I	Monitor Severe Accident Management Guideline for Implementation	SAMGs	

LEGEND AND NOTES: M=MANDATORY S=SUBSEQUENT I=IF NEEDED

- NOTES:**
1. = 10CFR50.72(c) REQUIRES THAT CONSUMERS ENERGY "MAINTAIN AN OPEN, CONTINUOUS COMMUNICATION CHANNEL WITH THE NRC OPERATIONS UPON REQUEST OF THE NRC"
 2. = 15 MINUTE UPDATES REQUIRED WHEN ABOVE UE
 3. = REFER TO EI-3 ATTACHMENT 2, FOR BACKUP PHONE NUMBERS (IF NEEDED)
 4. = FOR DAYSHIFT ON WEEKDAYS, SOUND THE EMERGENCY SIREN AND PERFORM PERSONNEL ACCOUNTABILITY ALL OTHER SHIFTS INCLUDING WEEKENDS AND HOLIDAYS, AUGMENT THE TELECOMPUTERS BY NOTIFYING THE SECURITY SHIFT LEADER WHO INITIATES (EXT 2278)

OTE: Completed forms shall be transmitted to Plant Licensing within 24 hours.