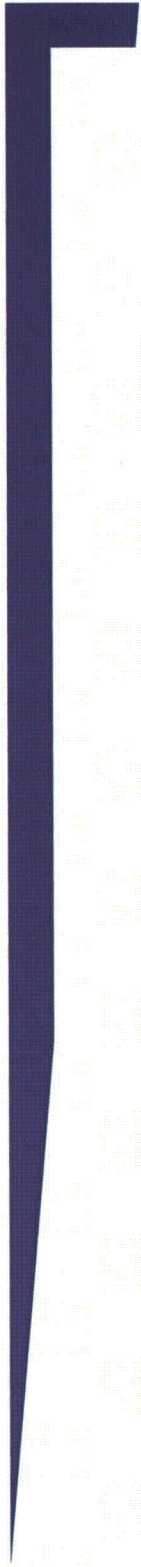


ATTACHMENT 3

**DISCUSSION OF REVISION
TO THE
RADIOLOGICAL EMERGENCY PLAN ANNEX
FOR
BYRON STATION
EP-AA-1002**

Enclosures

- Enclosure 3A - EAL Comparison Matrix Document
- Enclosure 3B - EAL Red-Line Basis Document
- Enclosure 3C - EAL Basis Document



NEI 99-01

REVISION 6

DEVELOPMENT OF EMERGENCY ACTION LEVELS FOR NON-PASSIVE REACTORS

ATTACHMENT 3
**DISCUSSION OF REVISION TO THE RADIOLOGICAL
EMERGENCY PLAN ANNEX FOR
BYRON STATION**



Exelon Generation

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AG1</p> <p>Initiating Condition – GENERAL EMERGENCY</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. Reading on any of the following radiation monitors greater than the reading shown for 15 minutes or longer:</p> <p>(site specific monitor list and threshold values)</p> <p>2. Dose assessment actual meteorology indicates doses greater than 1000 mrem TEDE or 5000 mrem thyroid CDE at or beyond (site specific dose receptor point)</p> <p>3. Field survey results indicate EITHER of the following at or beyond (site specific dose receptor point):</p> <ul style="list-style-type: none"> Closed window dose rates greater than 1000 mR/hr expected to continue for 60 minutes or longer. Analysis of field survey samples indicate thyroid CDE greater than 5000 mrem for one hour of inhalation. 	<p style="text-align: right;">RG1</p> <p>Initiating Condition:</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mRem TEDE or 5,000 mRem thyroid CDE.</p> <p>Operating Mode Applicability:</p> <p>1,2,3,4,5,6,D</p> <p>Emergency Action Levels (EAL) :</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > 9.99 E+09 µCi/sec for ≥ 15 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).</p> <p>OR</p> <p>2. Dose assessment Using actual meteorology indicates doses at or beyond the site boundary of EITHER:</p> <p>a. > 1000 mRem TEDE</p> <p>OR</p> <p>b. > 5000 mRem CDE Thyroid</p> <p>OR</p> <p>3. Field survey results at or beyond the site boundary indicate EITHER:</p> <p>a. Gamma (closed window) dose rates >1000 mR/hr are expected to continue for ≥ 60 minutes.</p> <p>OR</p> <p>b. Analyses of field survey samples indicate > 5000 mRem CDE Thyroid for 60 minutes of inhalation.</p>	<p><input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 " Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefor readily available on the 11x17 procedure matrix used by the SM.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AS1</p> <p>Initiating Condition – SITE AREA EMERGENCY</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 100 mrem TEDE or 500 mrem thyroid CDE.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. Reading on any of the following radiation monitors greater than the reading shown for 15 minutes or longer:</p> <p>(site specific monitor list and threshold values)</p> <p>2. Dose assessment actual meteorology indicates doses greater than 1000 mrem TEDE or 5000 mrem thyroid CDE at or beyond (site specific dose receptor point)</p> <p>3. Field survey results indicate EITHER of the following at or beyond (site specific dose receptor point):</p> <ul style="list-style-type: none"> Closed window dose rates greater than 100 mR/hr expected to continue for 60 minutes or longer. Analysis of field survey samples indicate thyroid CDE greater than 500 mrem for one hour of inhalation. 	<p style="text-align: right;">RS1</p> <p>Initiating Condition:</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 100 mRem TEDE or 500 mRem thyroid CDE.</p> <p>Operating Mode Applicability: 1,2,3,4,5,6,D</p> <p>Emergency Action Levels (EAL) :</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > 9.99 E+8 μCi/sec for \geq 15 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).</p> <p>OR</p> <p>2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of EITHER:</p> <ul style="list-style-type: none"> a. > 100 mRem TEDE OR b. > 500 mRem CDE Thyroid <p>OR</p> <p>3. Field survey results at or beyond the site boundary indicate EITHER:</p> <ul style="list-style-type: none"> a. Gamma (closed window) dose rates >100 mR/hr are expected to continue for \geq 60 minutes. OR b. Analyses of field survey samples indicate > 500 mRem CDE Thyroid for 60 minutes of inhalation. 	<p><input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 "Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefore readily available on the 11x17 procedure matrix used by the SM.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AA1</p> <p>Initiating Condition – ALERT</p> <p>Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Note:</p> <ul style="list-style-type: none"> The Emergency Director should declare the Alert promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. Reading on any of the following radiation monitors greater than the reading shown for 15 minutes or longer:</p> <p>(site-specific monitor list and threshold values)</p> <p>2. Dose assessment actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site specific dose receptor point)</p> <p>3. Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point) for one hour of exposure.</p> <p>4. Field survey results indicate EITHER of the following at or beyond (site specific dose receptor point):</p> <ul style="list-style-type: none"> Closed window dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer. Analysis of field survey samples indicate thyroid CDE greater than 50 mrem for one hour of inhalation. 	<p style="text-align: right;">RA1</p> <p>Initiating Condition:</p> <p>Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL) :</p> <p>Note:</p> <ul style="list-style-type: none"> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > 9.99 E+07 μCi/sec for \geq 15 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Nobel Gas Release Rate).</p> <p>OR</p> <p>2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of EITHER:</p> <p>a. > 10 mRem TEDE</p> <p>OR</p> <p>b. > 50 mRem CDE Thyroid</p> <p>OR</p> <p>3. Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than EITHER of the following at or beyond the site boundary</p> <p>a. 10 mRem TEDE for 60 minutes of exposure</p> <p>OR</p> <p>b. 50 mRem CDE Thyroid for 60 minutes of exposure</p> <p>OR</p> <p>4. Field survey results at or beyond the site boundary indicate EITHER:</p> <p>a. Gamma (closed window) dose rates > 10 mR/hr are expected to continue for \geq 60 minutes.</p> <p>OR</p> <p>b. Analyses of field survey samples indicate > 50 mRem CDE Thyroid for 60 minutes of inhalation.</p>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 " Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefor readily available on the 11x17 procedure matrix used by the SM.</p> <p>3) Calculations were performed, in accordance with (IAW) guidance provided in NEI 99-01 revision 6 EAL AA1, to determine the effluent monitor response for a radioactive liquid release and a WGD release via the normal site release pathway. The release would contain activity equivalent to provide 10mrem TEDE or 50mrem thyroid CDE at the site boundary. The calculation determined the effluent monitor responses would be > 110% of the instruments maximum range and as such, IAW NEI 99-01 Rev 6 guidance, was not included in this EAL.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AU1</p> <p>Initiating Condition – UNUSUAL EVENT</p> <p>Release of gaseous or liquid radioactivity greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Note:</p> <ul style="list-style-type: none"> • The Emergency Director should declare the Alert promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes. • If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes. <ol style="list-style-type: none"> 1. Reading on ANY effluent radiation monitor greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer: (site-specific monitor list and threshold values corresponding to 2 times the controlling document limits) 2. Reading on ANY effluent radiation monitor greater than 2 times the alarm setpoint established by a current radioactivity discharge permit for 60 minutes or longer. 3. Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times (site-specific effluent release controlling document limits) for 60 minutes or longer. 	<p style="text-align: right;">RU1</p> <p>Initiating Condition:</p> <p>Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL) :</p> <p>Note:</p> <ul style="list-style-type: none"> • The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes. • Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. <ol style="list-style-type: none"> 1. Reading on any of the following effluent monitors > 2 times alarm setpoint established by a current radioactive release discharge permit for ≥ 60 minutes. <ul style="list-style-type: none"> ▪ 0PR001, Liquid Radwaste Effluent Monitor ▪ 0PR002, Gas Decay Tank Effluent Monitor ▪ 0PR010, Station Blowdown Monitor ▪ 1/2 PR001, Containment Purge Effluent Monitor ▪ Discharge Permit specified monitor <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. The sum of readings on the Unit 1 and 2 Aux Bldg Vent WRGMs (1/2 RE-PR030) > 1.14 E+06 µCi/sec for ≥ 60 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate). <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 3. Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > 2 times ODCM Limit with a release duration of ≥ 60 minutes. 	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 " Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefor readily available on the 11x17 procedure matrix used by the SM.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AG2</p> <p>Initiating Condition – GENERAL EMERGENCY</p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer .</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels:</p> <p>NOTES: The Emergency Director should declare the General Emergency promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded</p> <p>1. Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.</p>	<p style="text-align: right;">RG2</p>	<p> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) EAL not used in accordance with the discussion in Section 1.4, NRC Order EA-12-051, it is recommended that this EAL be implemented when the enhanced spent fuel pool level instrumentation is available for use. The completion of the enhanced SFP level indicators and need for the inclusion of this EAL is being tracked in accordance with Exelon Generation Company, LLC's Initial Status Report to March 12, 2012 Commission Order Modifying Licenses with Regard for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) dated October 25,2012.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AS2</p> <p>Initiating Condition – SITE AREA EMERGENCY</p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 description)</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels:</p> <p>1. Spent fuel pool level cannot be restored to at least (site-specific Level 3 description)</p>	<p style="text-align: right;">RS2</p>	<p> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) EAL not used in accordance with the discussion in Section 1.4. NRC Order EA-12-051, it is recommended that this EAL be implemented when the enhanced spent fuel pool level instrumentation is available for use. The completion of the enhanced SFP level indicators and need for the inclusion of this EAL is being tracked in accordance with Exelon Generation Company, LLC's Initial Status Report to March 12, 2012 Commission Order Modifying Licenses with Regard for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) dated October 25, 2012.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AA2</p> <p>Initiating Condition – ALERT</p> <p>Significant lowering of water level above, or damage to, irradiated fuel.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <ol style="list-style-type: none"> 1. Uncovery of irradiated fuel in the REFUELING PATHWAY. 2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by ANY of the following radiation monitors: (site-specific listing of radiation monitors, and the associated readings, setpoints and/or alarms) 3. Lowering of spent fuel pool level to (site-specific Level 2 value). 	<p style="text-align: right;">RA2</p> <p>Initiating Condition:</p> <p>Significant lowering of water level above, or damage to, irradiated fuel.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6,D</p> <p>Emergency Action Levels (EAL) :</p> <ol style="list-style-type: none"> 1. Uncovery of irradiated fuel in the REFUELING PATHWAY. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by ANY Table R1 Radiation Monitor reading >1000 mRem/hr <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p style="text-align: center;">Table R1 Fuel Handling Incident Radiation Monitors</p> <ul style="list-style-type: none"> • Fuel Building Fuel Handling Incident Monitor 0RE-AR055 • Fuel Building Fuel Handling Incident Monitor 0RE-AR056 • Containment Fuel Handling Incident Monitor 1/2RE-AR011 • Containment Fuel Handling Incident Monitor 1/2RE-AR012 </div>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) EAL #3 not used in accordance with the discussion in Section 1.4, NRC Order EA-12-051, it is recommended that this EAL be implemented when the enhanced spent fuel pool level instrumentation is available for use. The completion of the enhanced SFP level indicators and need for the inclusion of this EAL is being tracked in accordance with Exelon Generation Company, LLC's Initial Status Report to March 12, 2012 Commission Order Modifying Licenses with Regard for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) dated October 25,2012.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AU2</p> <p>Initiating Condition: UNUSUAL EVENT UNPLANNED loss of water level above irradiated fuel Operating Mode Applicability: All</p> <p>Example Emergency Action Levels:</p> <p>1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following:</p> <p style="padding-left: 40px;">(site-specific level indications).</p> <p style="text-align: center;">AND</p> <p>b. UNPLANNED rise in area radiation levels as indicated by ANY of the following radiation monitors.</p> <p style="padding-left: 40px;">(site-specific list of area radiation monitors)</p>	<p style="text-align: right;">RU2</p> <p>Initiating Condition: UNPLANNED loss of water level above irradiated fuel Operating Mode Applicability: 1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL) :</p> <p>1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following :</p> <ul style="list-style-type: none"> • Refueling Cavity water level <23 ft above the Reactor Flange (< 423 ft. indicated level) <li style="text-align: center;">OR • Spent Fuel Pool water level < 23 ft. above the fuel (<422 ft 9 in indicated level) <li style="text-align: center;">OR • Indication or report of a drop in water level in the REFUELING PATHWAY. <p style="text-align: center;">AND</p> <p>b. UNPLANNED Area Radiation Monitor reading rise on ANY radiation monitor in Table R1.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Table R1 Fuel Handling Incident Radiation Monitors</p> <ul style="list-style-type: none"> • Fuel Building Fuel Handling Incident Monitor ORE-AR055 • Fuel Building Fuel Handling Incident Monitor ORE-AR056 • Containment Fuel Handling Incident Monitor 1/2RE-AR011 • Containment Fuel Handling Incident Monitor 1/2RE-AR012 </div>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific level indication and monitors to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification				
<p style="text-align: right;">AA3</p> <p>Initiating Condition – ALERT</p> <p>Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted</p> <ol style="list-style-type: none"> Dose rate greater than 15 mR/hr in ANY of the following areas: <ul style="list-style-type: none"> Control Room Central Alarm Station (other site-specific areas/rooms) An UNPLANNED event results in radiation levels that prevent or significantly impede access to any of the following plant rooms or areas: (site-specific list of plant rooms or areas with entry-related mode applicability identified) 	<p style="text-align: right;">RA3</p> <p>Initiating Condition:</p> <p>Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6,D</p> <p>Emergency Action Levels (EAL) :</p> <p>Note: If the equipment in the room or area listed in Table R3 was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted</p> <ol style="list-style-type: none"> Dose rate greater than 15 mR/hr in ANY of the following areas: <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">Table R2</p> <p style="text-align: center;">Areas Requiring Continuous Occupancy</p> <ul style="list-style-type: none"> Main Control Room – 1/2RE-AR010 Central Alarm Station – (by survey) </div> <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> An UNPLANNED event results in radiation levels that prohibit or significantly impede access to any of the following plant rooms or areas: <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">Table R3</p> <p style="text-align: center;">Areas with Entry Related Mode Applicability</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Area</th> <th style="width: 50%;">Entry Related Mode Applicability</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Auxiliary Building*</td> <td style="text-align: center;">Mode 4, 5, and 6</td> </tr> </tbody> </table> <p style="text-align: center;">*Areas required to establish shutdown cooling</p> </div>	Area	Entry Related Mode Applicability	Auxiliary Building*	Mode 4, 5, and 6	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Deference <input type="checkbox"/> Deletion</p> <p>1) Listed site specific plant rooms and areas with identified mode applicability to ensure timely classification.</p>
Area	Entry Related Mode Applicability					
Auxiliary Building*	Mode 4, 5, and 6					

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SU3</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Reactor coolant activity greater than Technical Specification allowable limits.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <ol style="list-style-type: none"> 1. (Site-specific radiation monitor) reading greater than (site-specific value). <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. Sample analysis indicates that a reactor coolant activity value is greater than an allowable limit specified in Technical Specifications. 	<p style="text-align: right;">RU3</p> <p>Initiating Condition:</p> <p>Reactor coolant activity greater than Technical Specification allowable limits.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. Gross Failed Fuel Monitor 1/2RE-PR006 (1/2 PS206- High Energy) indicating I-135 concentration > 5 $\mu\text{Ci/cc}$. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. Sample analysis indicates that: <ol style="list-style-type: none"> a. Dose Equivalent I-131 specific coolant activity > 60.0 $\mu\text{Ci/gm}$. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> b. Dose Equivalent XE-133 specific coolant activity > 603.0 $\mu\text{Ci/gm}$. 	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <ol style="list-style-type: none"> 1) Listed site-specific monitor and threshold value to ensure timely classification. 2) Listed this system category EAL in the radiological category EAL section to maintain consistency with current and previous revisions of Exelon EALs. This will ensure a timely classification since the threshold values are more aligned with the radiological category vice system category.

GENERAL EMERGENCY			SITE AREA EMERGENCY			ALERT		
FG1 Loss of any two barriers AND Loss or Potential Loss of third barrier. 1,2,3,4			FS1 Loss or Potential Loss of ANY two barriers. 1,2,3,4			FA1 ANY Loss or ANY Potential Loss of either Fuel Clad or RCS 1,2,3,4		
Sub-Category	FC – Fuel Clad		RC – Reactor Coolant System		CT - Containment			
	Loss	Potential Loss	Loss	Potential Loss	Loss	Potential Loss		
1. RCS or SG Tube Leakage	None	Core Cooling CSF-Orange Path conditions exist.	1. An automatic or manual SI actuation is required by EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube RUPTURE.	2. The capacity of one charging pump in the normal mode is exceeded due to EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube leakage. OR 3. RCS Integrity CFS-Red Path conditions exist	A leaking or RUPTURED SG is FAULTED outside of containment.	None		
2. Inadequate Heat Removal	1. Core Cooling CSF-Red Path conditions exist.	2. Core Cooling CSF-Orange Path conditions exist. 3. Heat Sink CSF-Red Path conditions exist.	None	Heat Sink CSF-Red Path conditions exist.	None	Core Cooling CSF-Red Path conditions exist.AND Functional Restoration Procedures <u>not</u> effective in < 15 minutes.		
3.RCS Activity/ Containment Radiation	1. Containment radiation monitor (AR020(21)) reading > 1.95E+03 R/hr. OR2. Coolant activity as sampled > 300µCi/gm Dose Equivalent I-131.	None	Containment radiation monitor (AR020(21)) reading > 25 R/hr.	None	None	Containment radiation monitor (AR020(21)) reading > 4.40E+03 R/hr.		
4. Containment Integrity or Bypass	None	None	None	None	1.Containment isolation is required and EITHER of the following: a. UNPLANNED lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Directors judgment indicate a loss of containment integrity. OR b. UNISOLABLE pathway from containment to the environment exists. OR 2 Indication of RCS leakage outside of containment	3. Containment CSF- Red Path conditions exist. OR 4. Hydrogen concentration inside containment >5%. OR 5. a. Containment pressure ≥20 psig. AND b. Less than one full train of containment Spray is operating per design for ≥15 minutes.		
5. Emergency Director Judgment	A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.	A. ANY Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.	A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.	A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.	A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.		

Proposed Fission Product Barrier Matrix

Fission Product Barrier Matrix							Hot Matrix
GENERAL EMERGENCY			SITE AREA EMERGENCY			ALERT	
FG1 Loss of any two barriers AND Loss or Potential Loss of third barrier. 1 2 3 4			FS1 Loss or Potential Loss of ANY two barriers. 1 2 3 4			FA1 ANY Loss or ANY Potential Loss of either Fuel Clad or RCS 1 2 3 4	
Sub-Category	FC – Fuel Clad		RC – Reactor Coolant System		CT – Containment		
	Loss	Potential Loss	Loss	Potential Loss	Loss	Potential Loss	
1. RCS or SG Tube Leakage	None	Core-Cooling CSF – Orange Path conditions exist.	1. An automatic or manual SI actuation is required by EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube RUPTURE.	2. The capacity of one charging pump in the normal mode is exceeded due to EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube RUPTURE. OR 3. RCS Integrity CFS - Red path conditions exist.	A leaking or RUPTURED SG is FAULTED outside of containment.	None	
2. Inadequate Heat Removal	1. Core-Cooling CSF – Red Path conditions exist.	2. Core-Cooling CSF – Orange Path conditions exist. OR 3. Heat Sink CSF - Red Path conditions exist.	None	Heat Sink CSF - Red Path conditions exist.	None	Core Cooling CSF-Red Path conditions exist AND Functional Restoration Procedures <u>not</u> effective in <15 minutes.	
3. Containment Radiation / RCS Activity	1. Containment radiation monitor (AR020(21)) reading > 1.95E+03 R/hr. OR 2. Coolant activity as sampled >300µCi/gm Dose Equivalent I-131.	None	Containment radiation monitor (AR020(21)) reading > 25 R/hr.	None	None	Containment radiation monitor(AR020(21)) reading > 4.40E+03 R/hr.	
4. Containment Integrity or Bypass	None	None	None	None	1. Containment isolation is required and EITHER of the following: a. UNPLANNED lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Directors judgment indicate a loss of containment integrity. OR b. UNISOLABLE pathway from containment to the environment exists. OR 2. Indication of RCS leakage outside of containment	3. Containment CSF - Red path conditions exist. OR 4. Hydrogen concentration in Containment ≥ 5%. OR 5. a. Containment pressure ≥ 20 psig. AND b. Less than one full train of Containment Spray is operating per design for ≥15 minutes.	
5. Emergency Director Judgment	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.	

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC1</p> <p>Category: Fuel Clad Barrier RCS or SG tube leakage Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Potential Loss A. RCS/reactor vessel level less than (site-specific level).</p>	<p style="text-align: right;">FC1</p> <p>Category: Fuel Clad Barrier RCS or SG tube leakage Operating Mode Applicability: 1, 2, 3, 4 Fission Product Barrier (FPB) Threshold: <u>Potential Loss</u> 1. Core-Cooling CSF – Orange Path conditions exist.</p>	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC2</p> <p>Category: Fuel Clad Barrier Inadequate Heat Removal Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Core exit thermocouple readings greater than (site-specific temperature value). Potential Loss A. Core exit thermocouple readings greater than (site-specific temperature value). OR B. Inadequate RCS heat removal capability via steam generators as indicated by (site-specific indications).</p>	<p style="text-align: right;">FC2</p> <p>Category: Fuel Clad Barrier RCS Activity Operating Mode Applicability: 1, 2, 3, 4 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Core-Cooling CSF – Red Path conditions exist. <u>Potential Loss</u> 2. Core-Cooling CSF – Orange Path conditions exist. OR 3. Heat Sink CSF - Red Path conditions exist.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC3</p> <p>Category: Fuel Clad Barrier Containment Radiation / RCS Activity Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Containment radiation monitor reading greater than (site-specific value). OR B. (Site-specific indications that reactor coolant activity is greater than 300 $\mu\text{Ci/gm}$ dose equivalent I-131).</p>	<p style="text-align: right;">FC3</p> <p>Category: Fuel Clad Barrier Containment Radiation / RCS Activity Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Containment radiation monitor (AR020(21)) reading > 1.95E+03 R/hr. OR 2. Coolant activity as sampled > 300$\mu\text{Ci/gm}$ Dose Equivalent I-131.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific monitor and threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC6</p> <p>Category: Fuel Clad Barrier Emergency Director Judgment</p> <p>Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Fission Product Barrier Threshold:</p> <p><u>Loss</u></p> <p>A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.</p> <p><u>Potential Loss</u></p> <p>A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.</p>	<p style="text-align: right;">FC5</p> <p>Category: Fuel Clad Barrier Emergency Director Judgment</p> <p>Operating Mode Applicability: 1, 2, 3</p> <p>Fission Product Barrier (FPB) Threshold:</p> <p><u>Loss</u></p> <p>1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.</p> <p><u>Potential Loss</u></p> <p>2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">RC1</p> <p>Category: Reactor Coolant System Barrier RCS or SG Tube Leakage</p> <p>Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Fission Product Barrier Threshold: Loss</p> <p>A. An automatic or manual ECCS (SI) actuation is required by EITHER of the following:</p> <ol style="list-style-type: none"> 1. UNISOLABLE RCS leakage <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. SG tube RUPTURE. <p>Potential Loss</p> <p>A. Operation of a standby charging (makeup) pump is required by EITHER of the following:</p> <ol style="list-style-type: none"> 1. UNISOLABLE RCS leakage <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. SG tube leakage. <p style="text-align: center;">OR</p> <p>B. RCS cooldown rate greater than (site-specific pressurized thermal shock criteria/limits defined by site-specific indications).</p>	<p style="text-align: right;">RC1</p> <p>Category: Reactor Coolant System Barrier RCS or SG Tube Leakage</p> <p>Operating Mode Applicability: 1, 2, 3</p> <p>Fission Product Barrier (FPB) Threshold: <u>Loss</u></p> <p>1. An automatic or manual SI actuation is required by EITHER of the following:</p> <ol style="list-style-type: none"> a. UNISOLABLE RCS leakage <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> b. SG tube RUPTURE. <p><u>Potential Loss</u></p> <p>2. The capacity of one charging pump in the normal charging mode is exceeded due to EITHER of the following:</p> <ol style="list-style-type: none"> a. UNISOLABLE RCS leakage <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> b. SG tube RUPTURE. <p style="text-align: center;">OR</p> <p>3. RCS Integrity CSF - Red path conditions exist.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">RC2</p> <p>Category: Reactor Coolant System Barrier Inadequate Heat Removal Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Potential Loss A. Inadequate RCS heat removal capability via steam generators as indicated by (site-specific indications).</p>	<p style="text-align: right;">RC2</p> <p>Category: Reactor Coolant System Barrier Inadequate Heat Removal Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Potential Loss</u> Heat Sink CSF - Red Path conditions exist.</p>	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">RC3</p> <p>Category: Reactor Coolant System Barrier Containment Radiation / RCS Activity Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Containment radiation monitor reading greater than (site-specific value).</p>	<p style="text-align: right;">RC3</p> <p>Category: Reactor Coolant System Barrier RCS Leak Rate Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> Containment radiation monitor (AR020(21)) reading > 25 R/hr.</p>	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific systems and threshold values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">RC6</p> <p>Category: Reactor Coolant System Barrier Emergency Director Judgment Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: <u>Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier. <u>Potential Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.</p>	<p style="text-align: right;">RC5</p> <p>Category: Reactor Coolant System Barrier Emergency director Judgment Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. ANY Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier. <u>Potential Loss</u> 2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT1</p> <p>Category: Containment Barrier RCS or SG Tube Leakage Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. A leaking or RUPTURED SG is FAULTED outside of containment.</p>	<p style="text-align: right;">CT1</p> <p>Category: Containment Barrier RCS or SG Tube Leakage Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> A leaking or RUPTURED SG is FAULTED outside of containment.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific threshold values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT2</p> <p>Category: Containment Barrier Inadequate Heat Removal Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Potential Loss A. 1. (Site-specific criteria for entry into core cooling restoration procedure) AND 2. Restoration procedure not effective within 15 minutes.</p>	<p style="text-align: right;">CT2</p> <p>Category: Containment Barrier Inadequate Heat Removal Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Potential Loss</u> Core-Cooling CSF Red Path conditions exist AND Functional Restoration procedures <u>not</u> effective in < 15 minutes</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific threshold values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT3</p> <p>Category: Containment Barrier Containment Radiation / RCS Activity Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Potential Loss A. Containment radiation monitor reading greater than (site-specific value).</p>	<p style="text-align: right;">CT3</p> <p>Category: Containment Barrier Containment Radiation / RCS Activity Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Potential Loss</u> Containment radiation monitor (AR020(21)) reading > 4.40E+03 R/hr.</p>	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific threshold values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT4</p> <p>Category: Containment Barrier Containment Integrity or Bypass Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Containment isolation is required AND EITHER of the following: 1. Containment integrity has been lost based on Emergency Director judgment. OR 2. UNISOLABLE pathway from the containment to the environment exists. OR B. Indications of RCS leakage outside of containment.</p> <p>Potential Loss A. Containment pressure greater than (site-specific value) OR B. Explosive mixture exists inside containment OR C. 1. Containment pressure greater than (site-specific pressure setpoint) AND 2. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer.</p>	<p style="text-align: right;">CT4</p> <p>Category: Containment Barrier Containment Integrity or Bypass Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Containment isolation is required and EITHER of the following: a. UNPLANNED lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Director judgment indicate a loss of containment integrity. OR b. UNISOLABLE pathway from containment to the environment exists. OR 2. Indication of RCS leakage outside of containment <u>Potential Loss</u> 3. Containment CSF - Red path conditions exist. OR 4. Hydrogen concentration in Containment \geq 5%. OR 5. a. Containment pressure \geq 20 psig. AND b. Less than one full train of Containment Spray is operating per design for \geq15 minutes.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific monitor and threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT6</p> <p>Category: Containment Barrier Emergency director Judgment</p> <p>Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Fission Product Barrier Threshold: <u>Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.</p> <p><u>Potential Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.</p>	<p style="text-align: right;">CT5</p> <p>Category: Containment Barrier Emergency Director Judgment</p> <p>Operating Mode Applicability: 1, 2, 3</p> <p>Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.</p> <p><u>Potential Loss</u> 2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.</p>	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SG1</p> <p>Initiating Condition: GENERAL EMERGENCY Prolonged loss of all offsite and all onsite AC power to emergency buses.</p> <p>Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the General Emergency promptly upon determining that (site-specific hours) has been exceeded, or will likely be exceeded.</p> <p>1. a. Loss of ALL offsite and ALL onsite AC power to (site-specific emergency buses).</p> <p style="padding-left: 40px;">AND</p> <p>b. EITHER of the following:</p> <ul style="list-style-type: none"> • Restoration of at least one emergency bus in less than (site-specific hours) is not likely. • (Site-specific indication of an inability to adequately remove heat from the core) 	<p style="text-align: right;">MG1</p> <p>Initiating Condition: Prolonged loss of all offsite and all onsite AC power to emergency buses.</p> <p>Operating Mode Applicability: 1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. Loss of ALL offsite AC power to unit ESF buses.</p> <p style="padding-left: 40px;">AND</p> <p>2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.</p> <p style="padding-left: 40px;">AND</p> <p>3. EITHER of the following:</p> <ul style="list-style-type: none"> • Restoration of at least one unit ESF bus in < 4 hours is not likely. <p style="padding-left: 40px;">OR</p> <ul style="list-style-type: none"> • Core Cooling CFS – Red Path conditions exist 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific equipment, site specific time based on station blackout coping analysis, and site specific indication to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SS1</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite and ALL onsite AC Power to (site-specific emergency buses) for 15 minutes or longer.</p>	<p style="text-align: right;">MS1</p> <p>Initiating Condition:</p> <p>Loss of all offsite and onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. Loss of ALL offsite AC power to unit ESF buses. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 3. Failure to restore power to at least one unit ESF bus in < 15 minutes from the time of loss of both offsite and onsite AC power. 	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SA1</p> <p>Initiating Condition: ALERT Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>1. a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer.</p> <p>AND</p> <p>b. Any additional single power source failure will result in loss of all AC power to SAFETY SYSTEMS.</p>	<p style="text-align: right;">MA1</p> <p>Initiating Condition: Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability: 1, 2, 3, 4</p> <p>Emergency Action Levels (EAL): Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. AC power capability to unit ESF buses reduced to only one of the following power sources for ≥ 15 minutes.</p> <ul style="list-style-type: none"> • Affected unit SAT 142-1(242-1) • Affected unit SAT 142-2(242-2) • Emergency Diesel Generator DG 1A(2A) • Emergency Diesel Generator DG 1B(2B) • Unit cross-tie breakers <p>AND</p> <p>2. Any additional single power source failure will result in a loss of ALL AC power to SAFETY SYSTEMS.</p>	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SU1</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite AC power capability to (site-specific emergency buses) for 15 minutes or longer</p>	<p style="text-align: right;">MU1</p> <p>Initiating Condition:</p> <p>Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite AC power capability to unit ESF buses for ≥ 15 minutes</p>	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SG8</p> <p>Initiating Condition: GENERAL EMERGENCY</p> <p>Loss of all AC and Vital DC power sources for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the General Emergency promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <p>1. Loss of ALL offsite and ALL onsite AC power to (site-specific emergency buses) for 15 minutes or longer.</p> <p>AND</p> <p>Indicated voltage is less than (site-specific bus voltage value) on ALL (site-specific vital DC buses) for 15 minutes or longer.</p>	<p style="text-align: right;">MG2</p> <p>Initiating Condition:</p> <p>Loss of all AC and Vital DC power sources for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. Loss of ALL offsite AC power to unit ESF buses.</p> <p>AND</p> <p>2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.</p> <p>AND</p> <p>3. Voltage is < 108 VDC on unit 125 VDC battery buses 111(211) and 112(212).</p> <p>AND</p> <p>4. All AC and Vital DC power sources have been lost for ≥ 15 minutes.</p>	<p><input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific voltage and equipment to ensure timely classification.</p> <p>2) Removed the word "indicated" this will allow for an indication problem to not cause confusion on the need to declare.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: SITE AREA EMERGENCY SS8</p> <p>Loss of all Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Site Area Emergency promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Indicated voltage is less than (site-specific bus voltage value) on ALL Vital DC buses for 15 minutes or longer.</p>	<p>Initiating Condition: MS2</p> <p>Loss of all Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Voltage is < 108 VDC on unit 125 VDC battery buses 111(211) and 112(212) for ≥ 15 minutes.</p>	<p><input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific equipment and site specific value to ensure timely classification.</p> <p>2) Removed the word "indicated" this will allow for an indication problem to not cause confusion on the need to declare.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SS5</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>Inability to shutdown the reactor causing a challenge to (core cooling [PWR] / RPV water level [BWR]) or RCS heat removal.</p> <p>Operating Mode Applicability:</p> <p>Power Operation</p> <p>Example Emergency Action Levels:</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor. <p style="margin-left: 20px;">AND</p> b. All manual actions to shutdown the reactor have been unsuccessful. <p style="margin-left: 20px;">AND</p> <ol style="list-style-type: none"> c. EITHER of the following conditions exist: <ol style="list-style-type: none"> 1. (Site-specific indication of an inability to adequately remove heat from the core) <p style="margin-left: 40px;">OR</p> 2. (Site-specific indication of an inability to adequately remove heat from the RCS) 	<p style="text-align: right;">MS3</p> <p>Initiating Condition:</p> <p>Inability to shutdown the reactor causing a challenge to core cooling or RCS heat removal.</p> <p>Operating Mode Applicability:</p> <p>1,2</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. Automatic or Manual Trip did <u>not</u> shutdown the reactor as indicated by Reactor Power \geq 5%. <p style="margin-left: 20px;">AND</p> <ol style="list-style-type: none"> 2. ALL manual actions to shutdown the reactor have been unsuccessful as indicated by Reactor Power \geq 5%. <p style="margin-left: 20px;">AND</p> <ol style="list-style-type: none"> 3. EITHER of the following conditions exist: <ol style="list-style-type: none"> a. Core Cooling CSF-RED Path conditions exist. <p style="margin-left: 40px;">OR</p> b. Heat Sink CSF-RED Path conditions exist. 	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Mode 2 included in operating mode applicability as per developer notes.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SA5</p> <p>Initiating Condition: ALERT</p> <p>Automatic or manual (trip [PWR] / scram [BWR]) fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.</p> <p>Operating Mode Applicability:</p> <p>Power Operation</p> <p>Example Emergency Action Levels:</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <p>1. a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor.</p> <p style="padding-left: 40px;">AND</p> <p>b. Manual action taken at the reactor control consoles are not successful in shutting down the reactor.</p>	<p style="text-align: right;">MA3</p> <p>Initiating Condition:</p> <p>Automatic or manual trip fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.</p> <p>Operating Mode Applicability:</p> <p>1,2</p> <p>Emergency Action Levels (EAL):</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <p>1. Automatic or manual Trip did <u>not</u> shutdown the reactor as indicated by Reactor Power \geq 5%.</p> <p style="padding-left: 40px;">AND</p> <p>2. Manual actions taken at the Main Control Board are <u>not</u> successful in shutting down the reactor as indicated by Reactor Power \geq 5%.</p>	<p> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Mode 2 included in operating mode applicability as per developer notes.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SU5</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Automatic or manual (trip [PWR] / scram [BWR]) fails to shutdown the reactor.</p> <p>Operating Mode Applicability:</p> <p>Power Operation</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <p>1. a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor.</p> <p style="text-align: center;">AND</p> <p>b. A subsequent manual action taken at the reactor control consoles is successful in shutting down the reactor.</p> <p>2. a. A manual trip ([PWR] / scram [BWR]) did not shutdown the reactor.</p> <p style="text-align: center;">AND</p> <p>b. EITHER of the following:</p> <p>1. A subsequent manual action taken at the reactor control consoles is successful in shutting down the reactor.</p> <p style="text-align: center;">OR</p> <p>2. A subsequent automatic (trip [PWR] / scram [BWR]) is successful in shutting down the reactor.</p>	<p style="text-align: right;">MU3</p> <p>Initiating Condition:</p> <p>Automatic or manual trip fails to shutdown the reactor.</p> <p>Operating Mode Applicability:</p> <p>1,2</p> <p>Emergency Action Levels (EAL):</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <p>1. a. Automatic Trip did not shutdown the reactor as indicated by Reactor Power \geq 5%.</p> <p style="text-align: center;">AND</p> <p>b. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor.</p> <p style="text-align: center;">OR</p> <p>2. a. Manual Trip did not shutdown the reactor as indicated by Reactor Power \geq 5%.</p> <p style="text-align: center;">AND</p> <p>b. EITHER of the following:</p> <p>1. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor.</p> <p style="text-align: center;">OR</p> <p>2. Subsequent Automatic Trip is successful in shutting down the reactor.</p>	<p><input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Mode 2 included in operating mode applicability as per developer notes.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification																		
<p>Initiating Condition: ALERT SA2</p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Alert promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <p>1. a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer. [see table below]</p> <table border="1" data-bbox="121 624 701 959"> <thead> <tr> <th>[BWR parameter list]</th> <th>[PWR parameter list]</th> </tr> </thead> <tbody> <tr> <td>Reactor Power</td> <td>Reactor Power</td> </tr> <tr> <td>RPV Level</td> <td>RCS Level</td> </tr> <tr> <td>RPV Pressure</td> <td>RCS Pressure</td> </tr> <tr> <td>Primary Containment Pressure</td> <td>In Core/Core Exit Temperature</td> </tr> <tr> <td>Suppression Pool Level</td> <td>Levels in at least (site specific number) steam generators</td> </tr> <tr> <td>Suppression Pool Temperature</td> <td>Steam Generator Auxiliary or Emergency Feed Water Flow</td> </tr> </tbody> </table> <p>AND</p> <p>b. Any of the following transient events in progress.</p> <ul style="list-style-type: none"> • Automatic or Manual runback greater than 25% thermal reactor power • Electrical load rejection greater than 25% full electrical load • Reactor Scram [BWR] / trip [PWR] • ECCS (SI) actuation • Thermal power oscillations greater than 10% [BWR] 	[BWR parameter list]	[PWR parameter list]	Reactor Power	Reactor Power	RPV Level	RCS Level	RPV Pressure	RCS Pressure	Primary Containment Pressure	In Core/Core Exit Temperature	Suppression Pool Level	Levels in at least (site specific number) steam generators	Suppression Pool Temperature	Steam Generator Auxiliary or Emergency Feed Water Flow	<p>Initiating Condition: MA4</p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. a. An UNPLANNED event results in the inability to monitor ANY Table M1 parameters from within the Control Room for ≥ 15 minutes.</p> <table border="1" data-bbox="831 650 1278 872"> <thead> <tr> <th>Table M1 – Control Room Parameters</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> • Reactor Power • PZR Level • RCS Pressure • In Core/Core Exit Temperature • Narrow Range level in at least one Steam Generator • Steam generator Auxiliary Feed Water Flow </td> </tr> </tbody> </table> <p>AND</p> <p>b. Any Table M2 transient in progress.</p> <table border="1" data-bbox="812 987 1295 1153"> <thead> <tr> <th>Table M2 – Significant Transients</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> • Automatic Turbine Runback >25% thermal reactor power • Electrical Load Rejection >25% full electrical load • Reactor Trip • Safety Injection Actuation </td> </tr> </tbody> </table>	Table M1 – Control Room Parameters	<ul style="list-style-type: none"> • Reactor Power • PZR Level • RCS Pressure • In Core/Core Exit Temperature • Narrow Range level in at least one Steam Generator • Steam generator Auxiliary Feed Water Flow 	Table M2 – Significant Transients	<ul style="list-style-type: none"> • Automatic Turbine Runback >25% thermal reactor power • Electrical Load Rejection >25% full electrical load • Reactor Trip • Safety Injection Actuation 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific number of steam generators to ensure timely classification.</p>
[BWR parameter list]	[PWR parameter list]																			
Reactor Power	Reactor Power																			
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NEI 99-01 Rev 6	Proposed EAL	Justification																
<p style="text-align: right;">SU2</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <p>An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer. [see table below]</p> <table border="1" data-bbox="121 636 699 966"> <thead> <tr> <th>[BWR parameter list]</th> <th>[PWR parameter list]</th> </tr> </thead> <tbody> <tr> <td>Reactor Power</td> <td>Reactor Power</td> </tr> <tr> <td>RPV Level</td> <td>RCS Level</td> </tr> <tr> <td>RPV Pressure</td> <td>RCS Pressure</td> </tr> <tr> <td>Primary Containment Pressure</td> <td>In Core/Core Exit Temperature</td> </tr> <tr> <td>Suppression Pool Level</td> <td>Levels in at least (site specific number) steam generators</td> </tr> <tr> <td>Suppression Pool Temperature</td> <td>Steam Generator Auxiliary or Emergency Feed Water Flow</td> </tr> </tbody> </table>	[BWR parameter list]	[PWR parameter list]	Reactor Power	Reactor Power	RPV Level	RCS Level	RPV Pressure	RCS Pressure	Primary Containment Pressure	In Core/Core Exit Temperature	Suppression Pool Level	Levels in at least (site specific number) steam generators	Suppression Pool Temperature	Steam Generator Auxiliary or Emergency Feed Water Flow	<p style="text-align: right;">MU4</p> <p>Initiating Condition:</p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>An UNPLANNED event results in the inability to monitor ANY Table M1 parameters from within the Control Room for ≥ 15 minutes.</p> <table border="1" data-bbox="793 657 1310 893"> <thead> <tr> <th>Table M1 – Control Room Parameters</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> • Reactor Power • PZR Level • RCS Pressure • In Core/Core Exit Temperature • Narrow Range level in at least one Steam Generator • Steam generator Auxiliary Feed Water Flow </td> </tr> </tbody> </table>	Table M1 – Control Room Parameters	<ul style="list-style-type: none"> • Reactor Power • PZR Level • RCS Pressure • In Core/Core Exit Temperature • Narrow Range level in at least one Steam Generator • Steam generator Auxiliary Feed Water Flow 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific number of steam generators to ensure timely classification.</p>
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NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: ALERT SA9</p> <p>Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>1. a. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> • Seismic event (earthquake) • Internal or external flooding event • High winds or tornado strike • FIRE • EXPLOSION • (site-specific hazards) • Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>b. EITHER of the following:</p> <p>1. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode.</p> <p>OR</p> <p>2. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode.</p>	<p>Initiating Condition: ALERT MA5</p> <p>Hazardous event affecting a SAFETY SYSTEM required for the current operating mode.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Emergency Action Levels (EAL):</p> <p>1. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> • Seismic event (earthquake) • Internal or external flooding event • High winds or tornado strike • FIRE • EXPLOSION • Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>2. EITHER of the following:</p> <p>a. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.</p> <p>OR</p> <p>b. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.</p>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) No additional site specific hazard noted</p> <p>2) Changed the word "needed" to "required" in the IC and to "required by Technical Specification" in the EAL, to be consistent with terminology used by operators and minimize confusion.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SU4</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>RCS leakage for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. RCS unidentified or pressure boundary leakage greater than (site-specific value) for 15 minutes or longer. 2. RCS identified leakage greater than (site-specific value) for 15 minutes or longer 3. Leakage from the RCS to a location outside containment greater than 25 gpm for 15 minutes or longer 	<p style="text-align: right;">MU6</p> <p>Initiating Condition:</p> <p>RCS leakage for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. RCS unidentified or pressure boundary leakage > 10 gpm for ≥ 15 minutes OR 2. RCS identified leakage > 25 gpm for ≥ 15 minutes OR 3. Leakage from the RCS to a location outside containment > 25 gpm for ≥ 15 minutes 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification																																								
<p style="text-align: right;">SU6</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Loss of all onsite or offsite communications capabilities</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <ol style="list-style-type: none"> Loss of ALL of the following onsite communication methods: (site-specific list of communications method) Loss of ALL of the following ORO communications s) methods: (site-specific list of communications methods) Loss of ALL of the following NRC communications methods: (site-specific list of communications methods) 	<p style="text-align: right;">MU7</p> <p>Initiating Condition:</p> <p>Loss of all onsite or offsite communication capabilities.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> Loss of ALL Table M3 Onsite communications capability affecting the ability to perform routine operations. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> Loss of ALL Table M3 Offsite communication capability affecting the ability to perform offsite notifications. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> Loss of ALL Table M3 NRC communication capability affecting the ability to perform NRC notifications. <table border="1" data-bbox="800 872 1310 1129"> <thead> <tr> <th colspan="4">Table M3 – Communications Capability</th> </tr> <tr> <th>System</th> <th>Onsite</th> <th>Offsite</th> <th>NRC</th> </tr> </thead> <tbody> <tr> <td>Radios</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant page</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant Telephone System</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Commercial Telephones</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>NARS</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>ENS</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>HPN</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>Satellite phones</td> <td></td> <td>X</td> <td>X</td> </tr> </tbody> </table>	Table M3 – Communications Capability				System	Onsite	Offsite	NRC	Radios	X			Plant page	X			Plant Telephone System	X			Commercial Telephones	X	X	X	NARS		X		ENS		X	X	HPN		X	X	Satellite phones		X	X	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific communication methods to ensure timely classification.</p>
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Commercial Telephones	X	X	X																																							
NARS		X																																								
ENS		X	X																																							
HPN		X	X																																							
Satellite phones		X	X																																							

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SU7</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Failure to isolate containment or loss of containment pressure control. [PWR]</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: (1 or 2)</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. Failure of containment to isolate when required by an actuation signal. <p style="margin-left: 20px;">AND</p> <ol style="list-style-type: none"> b. ALL required penetrations are not closed within 15 minutes of the actuation signal. 2. <ol style="list-style-type: none"> a. Containment pressure greater than (site-specific pressure). <p style="margin-left: 20px;">AND</p> <ol style="list-style-type: none"> b. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer. 	<p style="text-align: right;">MU8</p> <p>Initiating Condition:</p> <p>Failure to isolate containment or loss of containment pressure control.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. Failure of containment to isolate when required by an actuation signal. <p style="margin-left: 20px;">AND</p> <ol style="list-style-type: none"> b. ANY required penetration remains open > 15 minutes of the actuation signal. OR 2. <ol style="list-style-type: none"> a. Containment pressure \geq 20 psig. <p style="margin-left: 20px;">AND</p> <ol style="list-style-type: none"> b. Less than one full train of Containment Spray is operating per design for \geq 15 minutes. 	<p><input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Reworded EAL 1.b to be a positive statement</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CA2</p> <p>Initiating Condition: ALERT Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling, Defueled</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite and ALL onsite AC Power to (site-specific emergency buses) for 15 minutes or longer.</p>	<p style="text-align: right;">CA1</p> <p>Initiating Condition: Loss of all offsite and onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability: 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. Loss of ALL off-site AC power to unit ESF buses. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 3. Failure to restore power to at least one unit ESF bus in < 15 minutes from the time of loss of both offsite and onsite AC power. 	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CU2</p> <p>Initiating Condition: UNUSUAL EVENT Loss of all but one AC power source to emergency buses for 15 minutes or longer. Operating Mode Applicability: Cold Shutdown, Refueling, Defueled Example Emergency Action Levels: Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer. <p>AND</p> <ol style="list-style-type: none"> b. Any additional single power source failure will result in loss of all AC power to SAFETY SYSTEMS. 	<p style="text-align: right;">CU1</p> <p>Initiating Condition: Loss of all but one AC power source to emergency buses for 15 minutes or longer. Operating Mode Applicability: 5, 6, D Emergency Action Levels (EAL): Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. AC power capability to unit ESF buses reduced to only one of the following power sources for ≥ 15 minutes. <ul style="list-style-type: none"> • Affected unit SAT 142-1(242-1) • Affected unit SAT 142-2(242-2) • Emergency Diesel Generator DG 1A(2A) • Emergency Diesel Generator DG 1B(2B) • Unit crosstie breakers <p>AND</p> <ol style="list-style-type: none"> 2. Any additional single power source failure will result in a loss of ALL AC power to SAFETY SYSTEMS. 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CA6</p> <p>Initiating Condition – ALERT Hazardous event affecting SAFETY SYSTEM needed for the current operating mode.</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels:</p> <p>1. a. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> ● Seismic event (earthquake) ● Internal or external flooding event ● High winds or tornado strike ● FIRE ● EXPLOSION ● (site-specific hazards) ● Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>b. EITHER of the following:</p> <p>1. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode.</p> <p>OR</p> <p>2. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode.</p>	<p style="text-align: right;">CA2</p> <p>Initiating Condition: Hazardous event affecting SAFETY SYSTEM required for the current operating mode.</p> <p>Operating Mode Applicability: 5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>1. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> ● Seismic event (earthquake) ● Internal or external flooding event ● High winds or tornado strike ● FIRE ● EXPLOSION ● Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>2. EITHER of the following:</p> <p>a. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.</p> <p>OR</p> <p>b. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.</p>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) No additional site specific hazard noted</p> <p>2) Changed the word "needed" to "required" in the IC and to "required by Technical Specification" in the EAL, to be consistent with terminology used by operators and minimize confusion.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CU4</p> <p>Initiating Condition: UNUSUAL EVENT Loss of Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Indicated voltage is less than (site-specific bus voltage value) on required Vital DC buses for 15 minutes or longer.</p>	<p style="text-align: right;">CU3</p> <p>Initiating Condition: Loss of Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability: 5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Voltage is < 108 VDC on required unit 125 VDC battery buses 111(211) and 112(212) for ≥ 15 minutes.</p>	<p> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific voltage and equipment to ensure timely classification.</p> <p>2) Removed the word "indicated" this will allow for an indication problem to not cause confusion on the need to declare.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification																																								
<p style="text-align: right;">CU5</p> <p>Initiating Condition: UNUSUAL EVENT Loss of all onsite or offsite communications capabilities Operating Mode Applicability: Cold Shutdown, Refueling, Defueled Example Emergency Action Levels: (1 or 2 or 3)</p> <ol style="list-style-type: none"> Loss of ALL of the following onsite communication methods: (site-specific list of communications method) Loss of ALL of the following ORO communications s) methods: (site-specific list of communications methods) Loss of ALL of the following NRC communications methods: (site-specific list of communications methods) 	<p style="text-align: right;">CU4</p> <p>Initiating Condition: Loss of all onsite or offsite communication capabilities. Operating Mode Applicability: 5, 6, D Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> Loss of ALL Table C1 Onsite communications capability affecting the ability to perform routine operations. OR Loss of ALL Table C1 Offsite communication capability affecting the ability to perform offsite notifications. OR Loss of ALL Table C1 NRC communication capability affecting the ability to perform NRC notifications. <table border="1" data-bbox="821 665 1333 921"> <thead> <tr> <th colspan="4">Table C1 – Communications Capability</th> </tr> <tr> <th>System</th> <th>Onsite</th> <th>Offsite</th> <th>NRC</th> </tr> </thead> <tbody> <tr> <td>Radios</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant page</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant Telephone System</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Commercial Telephones</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>NARS</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>ENS</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>HPN</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>Satellite phones</td> <td></td> <td>X</td> <td>X</td> </tr> </tbody> </table>	Table C1 – Communications Capability				System	Onsite	Offsite	NRC	Radios	X			Plant page	X			Plant Telephone System	X			Commercial Telephones	X	X	X	NARS		X		ENS		X	X	HPN		X	X	Satellite phones		X	X	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific communications methods to ensure timely classification</p>
Table C1 – Communications Capability																																										
System	Onsite	Offsite	NRC																																							
Radios	X																																									
Plant page	X																																									
Plant Telephone System	X																																									
Commercial Telephones	X	X	X																																							
NARS		X																																								
ENS		X	X																																							
HPN		X	X																																							
Satellite phones		X	X																																							

CA3

Initiating Condition: ALERT

Inability to maintain the plant in cold shutdown.

Operating Mode Applicability:

Cold Shutdown, Refueling

Example Emergency Action Levels: (1 or 2)

Note: The Emergency Director should declare the Alert promptly upon determining that the applicable has been exceeded, or will likely be exceeded.

1. UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit) for greater than the duration specified in the following table.
2. UNPLANNED RCS pressure increase greater than (site-specific pressure reading). (This EAL does not apply during water-solid plant conditions. [PWR])

Table: RCS Heat-up Duration Thresholds		
RCS Status	Containment Closure Status	Heat-up Duration
Intact (but not RCS Reduced Inventory [PWR])	Not Applicable	60 minutes*
Not Intact (or at reduced inventory [PWR])	Established	20 minutes*
	Not Established	0 minutes

* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, the EAL is not applicable.

CA5

Initiating Condition:

Inability to maintain plant in cold shutdown.

Operating Mode Applicability:

5, 6

Emergency Action Levels (EAL):

Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. UNPLANNED rise in RCS temperature > 200°F due to loss of decay heat removal for > Table C2 duration.
- OR
2. UNPLANNED RCS pressure rise > 10 psig as a result of temperature rise due to loss of decay heat removal. (This EAL does not apply during water- solid plant conditions.)

Table C2 - RCS Heat-up Duration Thresholds		
RCS Status	Containment Closure Status	Heat-up Duration
Intact	Not Applicable	60 minutes*
Not Intact	Established	20 minutes*
	Not Established	0 minutes

OR

Reduced Inventory (<397 ft.)	Not Established	0 minutes
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* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, then EAL #1 is not applicable.

No Change Difference Deviation

- 1) Listed site specific Technical Specification cold shutdown temperature limit to ensure timely classification.
- 2) Listed site specific pressure reading to enhance timely classification.
- 3) Added wording relating the temp and press rise to a loss of decay heat removal capability as per the developer notes for PWR's

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CU3</p> <p>Initiating Condition: UNUSUAL EVENT UNPLANNED increase in RCS temperature.</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit). Loss of ALL RCS temperature and (reactor vessel/RCS [PWR] or RPV [BWR]) level indication for 15 minutes or longer. 	<p style="text-align: right;">CU5</p> <p>Initiating Condition: UNPLANNED rise in RCS temperature.</p> <p>Operating Mode Applicability: 5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> UNPLANNED rise in RCS temperature > 200°F due to loss of decay heat removal. <p>OR</p> <ol style="list-style-type: none"> Loss of the following for ≥ 15 minutes. <ul style="list-style-type: none"> ALL RCS temperature indications AND ALL RPV level indications 	<p><input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed site specific Technical Specification cold shutdown temperature limit to ensure timely classification.</p> <p>2) Changed the word increase to rise in the initiating condition to be consistent with operations language and training.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification									
<p style="text-align: right;">CG1</p> <p>Initiating Condition: GENERAL EMERGENCY</p> <p>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory affecting fuel clad integrity with containment challenged.</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 30 minutes time has been exceeded, or will likely be exceeded.</p> <p>1. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) vessel level less than (site-specific level) for 30 minutes or longer.</p> <p style="padding-left: 20px;">AND</p> <p>b. ANY indication from the Containment Challenge Table</p> <p>2. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) vessel level cannot be monitored for 30 minutes or longer.</p> <p style="padding-left: 20px;">AND</p> <p>b. Core uncover is indicated by ANY of the following:</p> <ul style="list-style-type: none"> • (Site-specific radiation monitor) reading greater than (site-specific value) • Erratic source range monitor indication [PWR] • UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover • (Other site-specific indications) <p style="padding-left: 20px;">AND</p> <p>c. ANY indication from the Containment Challenge Table).</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Table: Containment Challenge Table</td> </tr> <tr> <td style="padding: 2px;"> <ul style="list-style-type: none"> • CONTAINMENT CLOSURE not established* • (Explosive mixture) exists inside containment • UNPLANNED increase in containment pressure • Secondary containment radiation monitor reading above (site-specific value) [BWR] </td> </tr> <tr> <td style="padding: 2px;">* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.</td> </tr> </table>	Table: Containment Challenge Table	<ul style="list-style-type: none"> • CONTAINMENT CLOSURE not established* • (Explosive mixture) exists inside containment • UNPLANNED increase in containment pressure • Secondary containment radiation monitor reading above (site-specific value) [BWR] 	* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.	<p style="text-align: right;">CG6</p> <p>Initiating Condition:</p> <p>Loss of reactor vessel / RCS inventory affecting fuel clad integrity with containment challenged.</p> <p>Operating Mode Applicability: 5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. a. RVLIS indicates 0% Plenum for ≥ 30 minutes. OR Reactor Vessel Refueling Level Indicators LT-046 and LT-049 < 392 ft. el. for ≥ 30 minutes. AND</p> <p>b. ANY Containment Challenge Indication (Table C4) OR</p> <p>2. Reactor vessel level unknown for ≥ 30 minutes. AND</p> <p>3. Core uncover is indicated by ANY of the following:</p> <ul style="list-style-type: none"> a. Table C3 indications. OR b. Erratic Source Range Neutron Monitor indication. OR c. 1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors > 3000 mR/hr. <p style="padding-left: 20px;">AND</p> <p>4. Any Containment Challenge Indication (Table C4)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Table C3 Indications of RCS Leakage</td> </tr> <tr> <td style="padding: 2px;"> <ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss </td> </tr> <tr> <td style="padding: 2px;">*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Table C4 – Containment Challenge Indications</td> </tr> <tr> <td style="padding: 2px;"> <ul style="list-style-type: none"> • Hydrogen Concentration in Containment $\geq 5\%$ • UNPLANNED rise in containment pressure • CONTAINMENT CLOSURE not established </td> </tr> <tr> <td style="padding: 2px;">* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.</td> </tr> </table>	Table C3 Indications of RCS Leakage	<ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss 	*Rise in level is attributed to a loss of reactor vessel/RCS inventory.	Table C4 – Containment Challenge Indications	<ul style="list-style-type: none"> • Hydrogen Concentration in Containment $\geq 5\%$ • UNPLANNED rise in containment pressure • CONTAINMENT CLOSURE not established 	* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific values for level, developer notes indicate the level to be approximately Top of Active Fuel. The min indicated level of the transmitters LT-046 and 049 is 392 ft el. A level of 392 ft el along with RVLIS indicating 0% is being used as the lowest readable level. And allows for an escalation from CS6.</p> <p>2) Listed site specific levels, radiation monitors, and sumps and tanks to ensure timely classification.</p> <p>3) Listed Explosive mixture in the Containment Challenge Table to ensure timely classification.</p> <p>4) Worded "cannot be monitored" as unknown to ensure clarity for instances when the indicator is working but is over/under ranged. This is also in keeping with current EAL wording.</p>
Table: Containment Challenge Table											
<ul style="list-style-type: none"> • CONTAINMENT CLOSURE not established* • (Explosive mixture) exists inside containment • UNPLANNED increase in containment pressure • Secondary containment radiation monitor reading above (site-specific value) [BWR] 											
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NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CS1</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory affecting core decay heat removal capability.</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 30 minutes time has been exceeded, or will likely be exceeded.</p> <p>1. a. CONTAINMENT CLOSURE not established.</p> <p>AND</p> <p>b. (Reactor vessel/RCS [PWR] or RPV [BWR]) level less than (site-specific level).</p> <p>2. a. CONTAINMENT CLOSURE established.</p> <p>AND</p> <p>b. (Reactor vessel/RCS [PWR] or RPV [BWR]) level less than (site-specific level).</p> <p>3. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored for 30 minutes or longer.</p> <p>AND</p> <p>b. Core uncover is indicated by ANY of the following:</p> <ul style="list-style-type: none"> • (Site-specific radiation monitor) reading greater than (site-specific value) • Erratic source range monitor indication [PWR] • UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover • (Other site-specific indications) 	<p style="text-align: right;">CS6</p> <p>Initiating Condition:</p> <p>Loss of reactor vessel / RCS inventory affecting core decay heat removal capabilities.</p> <p>Operating Mode Applicability:</p> <p>5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. With CONTAINMENT CLOSURE established EITHER:</p> <p>a. RVLIS indicates 0% Plenum</p> <p>OR</p> <p>b. Reactor Vessel Refueling Level Indicators LT-046 and LT-049 < 392 ft el.</p> <p>OR</p> <p>2. With CONTAINMENT CLOSURE not established EITHER:</p> <p>a. RVLIS ≤ 15% Plenum.</p> <p>OR</p> <p>b. Reactor Vessel Refueling Level Indicators LT-046 and LT-049 < 393 ft. el.</p> <p>OR</p> <p>3. a. Reactor vessel level unknown for ≥30 minutes.</p> <p>AND</p> <p>b. Core uncover is indicated by any of the following:</p> <ul style="list-style-type: none"> • Table C3 indications. OR • Erratic Source Range Neutron Monitor indication. OR • 1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors > 3000 mR/hr. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p style="text-align: center;">Table C3 Indications of RCS Leakage</p> <ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank (rad waste) level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss <p style="font-size: small;">*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</p> </div>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific values for level, developer notes indicate the level to be approximately Top of Active Fuel. The min indicated level of the transmitters LT-046 and 049 is 392 ft el. A level of 392 ft el along with RVLIS indicating 0% is being used as the lowest readable level. And allows for an escalation from CA6.</p> <p>2) For Containment closure not established developer notes indicate the level to be 6" below the bottom ID of the RCS loop where it enters the vessel. This level is 391.9' and is below the min indicated level of the transmitters LT-046 and 049, which is 392 ft el. a level of 393 ft el. was chosen as well as ≤ 15% Plenum (the bottom of the hot leg) this is within the indicated range of the instrument, it also represents a substantial degradation of the condition from the CA6 level criteria and allows for escalation to CG6 as well as lowering for a Containment closure established level,</p> <p>3) Listed site specific radiation monitors to ensure timely classification</p> <p>4) Listed site specific sumps and tanks to ensure timely classification</p> <p>5) Worded "cannot be monitored" as unknown to ensure clarity for instances when the indicator is working but is over/under ranged. This is also in keeping with current EAL wording.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification			
<p style="text-align: right;">CA1</p> <p>Initiating Condition: ALERT Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory as indicated by level less than (site-specific level). <ol style="list-style-type: none"> (Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored for 15 minutes or longer <p>AND</p> <ol style="list-style-type: none"> UNPLANNED increase in (site-specific sump and/or tank) levels due to a loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory. 	<p style="text-align: right;">CA6</p> <p>Initiating Condition: Loss of reactor vessel / RCS inventory</p> <p>Operating Mode Applicability: 5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> <ol style="list-style-type: none"> Loss of reactor vessel / RCS inventory as indicated RVLIS < 37% Plenum. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> Loss of reactor vessel / RSC inventory as indicated by LT-046 and LT-049 < 393.5 ft. el. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> Reactor vessel / RCS level unknown for \geq 15 minutes. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> Loss of reactor vessel / RCS inventory per Table C3 indications. <table border="1" data-bbox="804 773 1312 964" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Table C3 Indications of RCS Leakage</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank (rad waste) level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss </td> </tr> <tr> <td> <p>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</p> </td> </tr> </tbody> </table> 	Table C3 Indications of RCS Leakage	<ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank (rad waste) level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss 	<p>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</p>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific levels to ensure timely classification. The developer notes indicate the levels to correspond to the level required to support RHR pump operation. IAW BOA PRI-10 (LOSS OF RH COOLING) RCS levels of > 37% or 393.5' on LT-046 and LT -049 as necessary to maintain RH pumps operating at reduced inventory conditions. These levels were chosen to be consistent with the developer notes and the site abnormal operating procedures.</p> <p>2) Listed site specific sumps and tanks to ensure timely classification.</p> <p>3) Worded "cannot be monitored" as unknown to ensure clarity for instances when the indicator is working but is over/under ranged. This is also in keeping with current EAL wording.</p>
Table C3 Indications of RCS Leakage					
<ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank (rad waste) level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss 					
<p>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</p>					

NEI 99-01 Rev 6	Proposed EAL	Justification			
<p style="text-align: right;">CU1</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>UNPLANNED loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory for 15 minutes or longer.</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> UNPLANNED loss of reactor coolant results in (reactor vessel/RCS [PWR] or RPV [BWR]) level less than a required lower limit for 15 minutes or longer. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> UNPLANNED increase in (site-specific sump and/or tank) levels. 	<p style="text-align: right;">CU6</p> <p>Initiating Condition:</p> <p>UNPLANNED loss of reactor vessel / RCS inventory for 15 minutes or longer.</p> <p>Operating Mode Applicability: 5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> UNPLANNED loss of reactor coolant results in the inability to restore and maintain reactor vessel / RCS level to > procedurally established lower limit for ≥ 15 minutes. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> a. Reactor vessel / RCS level unknown. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> Loss of reactor vessel / RCS inventory per Table C3 indications. <table border="1" data-bbox="804 740 1314 935" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Table C3 Indications of RCS Leakage</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank (rad waste) level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss </td> </tr> <tr> <td>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</td> </tr> </tbody> </table>	Table C3 Indications of RCS Leakage	<ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank (rad waste) level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss 	*Rise in level is attributed to a loss of reactor vessel/RCS inventory.	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <ol style="list-style-type: none"> Listed site specific sumps and tanks to ensure timely classification. Described "a required lower limit" as a procedurally established lower limit, and listed site specific sumps and tanks to ensure timely classification. Worded "cannot be monitored" as unknown to ensure clarity for instances when the indicator is working but is over/under ranged. This is also in keeping with current EAL wording.
Table C3 Indications of RCS Leakage					
<ul style="list-style-type: none"> • UNPLANNED Containment Sump level rise* • UNPLANNED Auxiliary Bldg. Sump level rise* • UNPLANNED Tank (rad waste) level rise* • UNPLANNED rise in RCS makeup • Observation of leakage or inventory loss 					
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.					

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: GENERAL EMERGENCY HG1</p> <p>HOSTILE ACTION resulting in loss of physical control of the facility.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>1. a. A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-specific security shift supervision).</p> <p style="padding-left: 20px;">AND</p> <p style="padding-left: 20px;">b. EITHER of the following:</p> <p style="padding-left: 40px;">1. ANY of the following safety functions cannot be controlled or maintained.</p> <ul style="list-style-type: none"> ▪ Reactivity control ▪ Core cooling [PWR] / RPV water level [BWR] ▪ RCS heat removal <p style="padding-left: 40px;">OR</p> <p style="padding-left: 40px;">2. Damage to spent fuel has occurred or is IMMINENT</p>	<p>Initiating Condition: HG1</p> <p>HOSTILE ACTION resulting in loss of physical control of the facility.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>1. A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.</p> <p style="padding-left: 20px;">AND</p> <p>2. a. ANY Table H1 safety function <u>cannot</u> be controlled or maintained.</p> <p style="padding-left: 40px;">OR</p> <p style="padding-left: 40px;">b. Damage to spent fuel has occurred or is IMMINENT</p> <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p style="text-align: center; margin: 0;">Table H1 – Safety Functions</p> <ul style="list-style-type: none"> • Reactivity Control (ability to shutdown the reactor and keep it shutdown) • Core Cooling (ability to cool the core) • RCS Heat Removal (ability to maintain a heatsink) </div>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) List site security shift supervision as Security Force.</p> <p>2) Added descriptors to better explain each safety function and allow for a timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HS1</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>HOSTILE ACTION within the Protected Area.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-security shift supervision).</p>	<p style="text-align: right;">HS1</p> <p>Initiating Condition:</p> <p>HOSTILE ACTION within the Protected Area.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.</p>	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) List site security shift supervision as Security Force.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HA1</p> <p>Initiating Condition: ALERT</p> <p>HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2)</p> <ol style="list-style-type: none"> 1. A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the (site-specific security shift supervision). 2. A validated notification from NRC of an aircraft attack threat within 30 minutes of the site. 	<p style="text-align: right;">HA1</p> <p>Initiating Condition:</p> <p>HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. A validated notification from NRC of an aircraft attack threat < 30 minutes from the site. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. Notification by the Security Force that a HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA. 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) List site security shift supervision as Security Force.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT HU1</p> <p>Confirmed SECURITY CONDITION or threat.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <ol style="list-style-type: none"> 1. A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the (site-specific security shift supervision). 2. Notification of a credible security threat directed at the site. 3. A validated notification from the NRC providing information of an aircraft threat. 	<p>Initiating Condition: HU1</p> <p>Confirmed SECURITY CONDITION or threat.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. Notification of a credible security threat directed at the site as determined per SY-AA-101-132, Security Assessment and Response to Unusual Activities. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. A validated notification from the NRC providing information of an aircraft threat. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 3. Notification by the Security Force of a SECURITY CONDITION that does <u>not</u> involve a HOSTILE ACTION. 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) List site security shift supervision as Security Force.</p> <p>2) Further described credible security threat through listing a site specific procedure.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HS6</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>Inability to control a key safety function from outside the Control Room.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 and 2)</p> <p>Note: The Emergency Director should declare the event promptly upon determining that (site-specific number of minutes) has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> An event has resulted in plant control being transferred from the Control Room to (site-specific remote shutdown panels and local control stations). Control of ANY of the following key safety functions is not reestablished within (site-specific number of minutes). <ul style="list-style-type: none"> Reactivity control Core cooling [PWR] / RPV water level [BWR] RCS heat removal 	<p style="text-align: right;">HS2</p> <p>Initiating Condition:</p> <p>Inability to control a key safety function from outside the Control Room.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BOA PRI-5, Control Room Inaccessibility. <p>AND</p> <ol style="list-style-type: none"> Control of ANY Table H1 key safety function is <u>not</u> reestablished in < 15 minutes. <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p style="text-align: center;">Table H1 – Safety Functions</p> <ul style="list-style-type: none"> Reactivity Control (ability to shutdown the reactor and keep it shutdown) Core Cooling (ability to cool the core) RCS Heat Removal (ability to maintain a heatsink) </div>	<p style="text-align: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) EAL uses the site specific Control Room evacuation procedure to effectively list all of the alternate locations, panels, and stations requested by the developer notes. This would be the procedure the Control Room would enter should such an event occur, this allows for greater clarity as to when this EAL would apply than if each panel and station used in alternate shutdown were to be listed.</p> <p>2) Added descriptors to better explain each safety function and allow for a timely classification.</p> <p>3) Changed "An event" to "A Control Room evacuation" to remove confusion if partial plant control was transferred to outside the control room with the control room still manned, due to testing or equipment failure.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HA6</p> <p>Initiating Condition: ALERT</p> <p>Control Room evacuation resulting in transfer of plant control to alternate locations.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: An event has resulted in plant control being transferred from the Control Room to (site-specific remote shutdown panels and local control stations).</p>	<p style="text-align: right;">HA2</p> <p>Initiating Condition:</p> <p>Control Room evacuation resulting in transfer of plant control to alternate locations.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL): A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BOA PRI-5, Control Room Inaccessibility.</p>	<p> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) EAL uses the site specific Control Room evacuation procedure to effectively list all of the alternate locations, panels, and stations requested by the developer notes. This would be the procedure the Control Room would enter should such an event occur, this allows for greater clarity as to when this EAL would apply than if each panel and station used in alternate shutdown were to be listed.</p> <p>2) Changed "An event" to "A Control Room evacuation" to remove confusion if partial plant control was transferred to outside the control room with the control room still manned, due to testing or equipment failure.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification		
<p style="text-align: right;">HU4</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>FIRE potentially degrading the level of safety of the plant.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2 or 3 or 4)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. a. A FIRE is NOT extinguished within 15-minutes of ANY of the following FIRE detection indications: <ul style="list-style-type: none"> • Report from the field (i.e., visual observation) • Receipt of multiple (more than 1) fire alarms or indications • Field verification of a single fire alarm <p style="text-align: center;">AND</p> b. The FIRE is located within ANY of the following plant rooms or areas: (site-specific list of plant rooms or areas) 2. a. Receipt of a single fire alarm (i.e., no other indications of a FIRE). AND b. The FIRE is located within ANY of the following plant rooms or areas: (site-specific list of plant rooms or areas) AND c. The existence of a FIRE is not verified within 30-minutes of alarm receipt. 3. A FIRE within the plant or ISFSI [for plants with an ISFSI outside the plant Protected Area] PROTECTED AREA not extinguished within 60-minutes of the initial report, alarm or indication. 4. A FIRE within the plant or ISFSI [for plants with an ISFSI outside the plant Protected Area] PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish. 	<p style="text-align: right;">HU3</p> <p>Initiating Condition:</p> <p>FIRE potentially degrading the level of safety of the plant.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. a. A FIRE in any Table H2 area is <u>not</u> extinguished in <15-minutes of ANY of the following FIRE detection indications: <ul style="list-style-type: none"> • Report from the field (i.e., visual observation) • Receipt of multiple (more than 1) fire alarms or indications • Field verification of a single fire alarm <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Table H2 – Vital Areas</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"> <ul style="list-style-type: none"> • Containment • Auxiliary Building • Fuel Handling Building • Main Steam Tunnels • RWST's • Condensate Storage Tanks • Essential Service Water Cooling Towers </td> </tr> </tbody> </table> <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. a. Receipt of a single fire alarm in any Table H2 area (i.e., no other indications of a FIRE). AND b. The existence of a FIRE is not verified in <30-minutes of alarm receipt. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 3. A FIRE within the plant PROTECTED AREA not extinguished in <60-minutes of the initial report, alarm or indication. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 4. A FIRE within the plant PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish. 	Table H2 – Vital Areas	<ul style="list-style-type: none"> • Containment • Auxiliary Building • Fuel Handling Building • Main Steam Tunnels • RWST's • Condensate Storage Tanks • Essential Service Water Cooling Towers 	<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific list of plant rooms or areas that contain SAFETY SYSTEM equipment to ensure timely classification.</p>
Table H2 – Vital Areas				
<ul style="list-style-type: none"> • Containment • Auxiliary Building • Fuel Handling Building • Main Steam Tunnels • RWST's • Condensate Storage Tanks • Essential Service Water Cooling Towers 				

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HU2</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Seismic event greater than OBE levels.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Seismic event greater than Operating Basis Earthquake (OBE) as indicated by: a. (site-specific indication that a seismic event met or exceeded OBE limits)</p>	<p style="text-align: right;">HU4</p> <p>Initiating Condition:</p> <p>Seismic event greater than OBE levels.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Seismic event > Operating Basis Earthquake (OBE) as indicated by seismic check at panel OPA02J.</p>	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific indication to determining OBE limits have been met or exceeded to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification								
<p style="text-align: right;">HA5</p> <p>Initiating Condition: ALERT</p> <p>Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Note: If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.</p> <p>1. a. Release of a toxic, corrosive, asphyxiant or flammable gas into any of the following plant rooms or areas: (site-specific list of plant rooms or areas with entry-related mode applicability identified)</p> <p style="text-align: center;">AND</p> <p>b. Entry into the room or area is prohibited or impeded.</p>	<p style="text-align: right;">HA5</p> <p>Initiating Condition:</p> <p>Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.</p> <p>1. Release of a toxic, corrosive, asphyxiant or flammable gas in a Table H3 area.</p> <table border="1" data-bbox="789 670 1329 844" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2" style="text-align: center;">Table H3 Areas with Entry Related Mode Applicability</th> </tr> <tr> <th style="text-align: center;">Area</th> <th style="text-align: center;">Entry Related Mode Applicability</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Auxiliary Building*</td> <td style="text-align: center;">Mode 4, 5, and 6</td> </tr> <tr> <td colspan="2" style="text-align: center;">*Areas required to establish shutdown cooling</td> </tr> </tbody> </table> <p style="text-align: center;">AND</p> <p>2. Entry into the room or area is prohibited or impeded.</p>	Table H3 Areas with Entry Related Mode Applicability		Area	Entry Related Mode Applicability	Auxiliary Building*	Mode 4, 5, and 6	*Areas required to establish shutdown cooling		<p style="text-align: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed plant specific rooms and areas with entry related mode applicability to ensure timely classification.</p>
Table H3 Areas with Entry Related Mode Applicability										
Area	Entry Related Mode Applicability									
Auxiliary Building*	Mode 4, 5, and 6									
*Areas required to establish shutdown cooling										

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HU3</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Hazardous Event</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2 or 3 or 4)</p> <p>Note: EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.</p> <ol style="list-style-type: none"> 1. A tornado strike within the PROTECTED AREA. 2. Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component needed for the current operating mode. 3. Movement of personnel within the PROTECTED AREA is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release). 4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles. 5. (Site-specific list of natural or technological hazard events) 	<p style="text-align: right;">HU6</p> <p>Initiating Condition:</p> <p>Hazardous Event</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.</p> <ol style="list-style-type: none"> 1. Tornado strike within the PROTECTED AREA. OR 2. Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component required by Technical Specifications for the current operating mode. OR 3. Movement of personnel within the PROTECTED AREA is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release). OR 4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles. 	<p> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) No site specific list of natural or technological hazard events was noted.</p> <p>2) Changed the word "needed" to "required by Technical Specifications" in the EAL to be consistent with terminology used by operators and minimize confusion.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HG7</p> <p>Initiating Condition: GENERAL EMERGENCY</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or IMMEDIATE substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area.</p>	<p style="text-align: right;">HG7</p> <p>Initiating Condition:</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL): Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or IMMEDIATE substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area..</p>	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HS7</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels beyond the site boundary.</p>	<p style="text-align: right;">HS7</p> <p>Initiating Condition:</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL): Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels beyond the site boundary.</p>	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HA7</p> <p>Initiating Condition: ALERT</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.</p>	<p style="text-align: right;">HA7</p> <p>Initiating Condition:</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL): Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.</p>	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HU7</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Other conditions existing which in the judgment of the Emergency director warrant declaration of an UNUSUAL EVENT.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.</p>	<p style="text-align: right;">HU7</p> <p>Initiating Condition:</p> <p>Other conditions existing which in the judgment of the Emergency director warrant declaration of an UNUSUAL EVENT.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.</p>	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">E-HU1</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading greater than (2 times the site-specific cask specific technical specification allowable radiation level) on the surface of the spent fuel cask.</p>	<p style="text-align: right;">E-HU1</p> <p>Initiating Condition:</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading:</p> <ul style="list-style-type: none"> • > 60 mr/hr (gamma + neutron) on the top of the spent fuel cask <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • > 600 mr/hr (gamma + neutron) on the side of the spent fuel cask, excluding inlet and outlet ducts. 	<p><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</p> <p>1) Listed 2x the site specific cask specific allowable radiation level as per the Certificate of Compliance No. 1014 Appendix A Section 5.7</p>

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ARG1**Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 1000 mR~~f~~em TEDE or 5000 mR~~f~~em thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- ~~The Emergency Director should declare the General Emergency event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.~~
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
- ~~Classification based on effluent monitor readings assumes that a release path to the environment is established.~~ If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
- The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.

~~(1) Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer:~~

~~—— (site specific monitor list and threshold values)~~

1. ~~The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > 9.99 E+09 uCi/sec for ≥ 15 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).~~

OR

2. ~~Dose assessment Using actual meteorology indicates doses at or beyond (site-specific dose receptor point) the site boundary of EITHER:~~

a. ~~> 1000 mRem TEDE~~

OR

b. ~~> 5000 mRem CDE Thyroid~~

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OR

~~— Field survey results indicate **EITHER** of the following at or beyond (site-specific dose-receptor point):~~

~~— Closed window dose rates greater than 1,000 mR/hr expected to continue for 60 minutes or longer.~~

~~— Analyses of field survey samples indicate thyroid CDE greater than 5,000 mrem for one hour of inhalation.~~

3. Field survey results at or beyond the site boundary indicate **EITHER**:

a. Gamma (closed window) dose rates **>1000 mR/hr** are expected to continue for **≥ 60 minutes**.

OR

b. Analyses of field survey samples indicate **> 5000 mRem CDE Thyroid** for **60 minutes** of inhalation.

Basis:

This IC addresses a release of gaseous radioactivity that results in projected or actual offsite doses greater than or equal to the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude will require implementation of protective actions for the public.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at the EPA PAG of 1000 mRrem while the 5000 mRrem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

~~Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.~~

Basis Reference(s):

1. NEI 99-01 Rev 6, AG1
2. EP-AA-112-500 Emergency Environmental Monitoring

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3. EP-EAL-0602 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Byron Station

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

ARS1**Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 100 mRrem TEDE or 500 mRrem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- ~~The Emergency Director should declare the Site Area Emergency event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded~~
 - ~~The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.~~
 - If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
 - Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
 - The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.
- (1) ~~Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer:~~
- ~~(site-specific monitor list and threshold values)~~
- (2) ~~Dose assessment using actual meteorology indicates doses greater than 100 mrem TEDE or 500 mrem thyroid CDE at or beyond (site-specific dose receptor point).~~
- (3) ~~Field survey results indicate EITHER of the following at or beyond (site-specific dose receptor point):~~
- ~~Closed window dose rates greater than 100 mR/hr expected to continue for 60 minutes or longer.~~
 - ~~Analyses of field survey samples indicate thyroid CDE greater than 500 mrem for one hour of inhalation.~~

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1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > **9.99 E+08 uCi/sec for ≥ 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

2. Dose assessment using actual meteorology indicates doses at or beyond the site boun of **EITHER:**

- a. **> 100 mRem TEDE**

OR

- b. **> 500 mRem CDE Thyroid**

OR

3. Field survey results at or beyond the site boundary indicate **EITHER:**

- a. Gamma (closed window) dose rates **>100 mR/hr** are expected to continue for **≥ 60 minutes**.

OR

Analyses of field survey samples indicate **> 500 mRem CDE Thyroid for 60 minutes** of inhalation.

Basis:

This IC addresses a release of gaseous radioactivity that results in projected or actual offsite doses greater than or equal to 10% of the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude are associated with the failure of plant systems needed for the protection of the public.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at 10% of the EPA PAG of 1000 mRrem while the 500 mRrem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

~~Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.~~

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Escalation of the emergency classification level would be via IC RAG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, AS1
2. EP-AA-112-500 Emergency Environmental Monitoring
3. EP-EAL-0602 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Byron Station

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

ARA1

Initiating Condition:

Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mRrem TEDE or 50 mRrem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Notes:

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
 - ~~The Emergency Director should declare the Alert event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.~~
 - If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
 - Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
 - The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.
- (1) ~~Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer:~~
- ~~(site-specific monitor list and threshold values)~~
- (2) ~~Dose assessment using actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point).~~
- (3) ~~Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point) for one hour of exposure.~~
- (4) ~~Field survey results indicate EITHER of the following at or beyond (site-specific dose receptor point):~~
- ~~Closed window dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer.~~
 - ~~Analyses of field survey samples indicate thyroid CDE greater than 50 mrem for one~~

RECOGNITION CATEGORY
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~~hour of inhalation.~~

1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) **> 9.99 E+07 uCi/sec for \geq 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of **EITHER:**

- a. **> 10 mRem TEDE**

OR

- b. **> 50 mRem CDE Thyroid**

OR

3. Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than **10 mRem TEDE** or **50 mRem CDE thyroid** at or beyond the site boundary for **60 minutes** of exposure.

OR

4. Field survey results at or beyond the site boundary indicate **EITHER:**

- a. Gamma (closed window) dose rates **> 10 mR/hr** are expected to continue for **\geq 60 minutes**.

OR

- b. Analyses of field survey samples indicate **> 50 mRem CDE Thyroid** for **60 minutes** of inhalation.

Basis:

This IC addresses a release of gaseous or liquid radioactivity that results in projected or actual offsite doses greater than or equal to 1% of the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this

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magnitude represent an actual or potential substantial degradation of the level of safety of the plant as indicated by a radiological release that significantly exceeds regulatory limits (e.g., a significant uncontrolled release).

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at 1% of the EPA PAG of 1000 mRrem while the 50 mRrem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

~~Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.~~

Escalation of the emergency classification level would be via IC RAS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, AA1
2. UFSAR Section 11.5.2.3
3. 0BISR 11.a.3-002, Channel Operation Test of Liquid Radwaste Effluent Radiation Monitor 0PR01J
4. ODCM, CY-BY-170-301, Section 3.0, Liquid Effluents
5. EP-EAL-0602 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Byron Station
6. EP-EAL-0619 Rev. 0, Byron Criteria for Choosing Radiological Liquid Effluents EAL Threshold Values.
7. EP-EAL-0624 Rev. 0, Byron Criteria for Choosing Radiological Gaseous Effluents EAL Threshold Values for Waste Gas Decay Tanks

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ARU1**Initiating Condition:**

Release of gaseous or liquid radioactivity greater than 2 times the **ODCM** (~~site-specific effluent release controlling document~~) limits for 60 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
 - ~~The Emergency Director should declare the Unusual Event event promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded.~~
 - If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes.
 - **Classification based on effluent monitor readings assumes that a release path to the environment is established.** If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
- (1) ~~Reading on **ANY** effluent radiation monitor greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer:~~
- ~~(site-specific monitor list and threshold values corresponding to 2 times the controlling document limits)~~
- (2) ~~Reading on **ANY** effluent radiation monitor greater than 2 times the alarm setpoint established by a current radioactivity discharge permit for 60 minutes or longer.~~
- (3) ~~Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer.~~
1. **Reading on any of the following effluent monitors > 2 times alarm setpoint established by a current radioactive release discharge permit for ≥ 60 minutes.**
 - OPR001, Liquid Radwaste Effluent Monitor
 - OPR002, Gas Decay Tank Effluent Monitor
 - OPR010, Station Blowdown Monitor
 - 1/2PR001, Containment Purge Effluent Monitor

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- Discharge Permit specified monitor

OR

2. The sum of readings on the Unit 1 and 2 Aux Bldg Vent WRGMs (1/2 RE-PR030) > **1.14 E+06 uCi/sec** for **≥ 60 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

3. Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > **2 times ODCM Limit** with a release duration of **≥ 60 minutes**.

Basis:

This IC addresses a potential decrease in the level of safety of the plant as indicated by a low-level radiological release that exceeds regulatory commitments for an extended period of time (e.g., an uncontrolled release). It includes any gaseous or liquid radiological release, monitored or un-monitored, including those for which a radioactivity discharge permit is normally prepared.

Nuclear power plants incorporate design features intended to control the release of radioactive effluents to the environment. Further, there are administrative controls established to prevent unintentional releases, and to control and monitor intentional releases. The occurrence of an extended, uncontrolled radioactive release to the environment is indicative of degradation in these features and/or controls.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

~~Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.~~

Releases should not be prorated or averaged. For example, a release exceeding 4 times release limits for 30 minutes does not meet the EAL.

EAL #1 Basis:

~~EAL #2~~– This EAL addresses radioactivity releases that cause effluent radiation monitor readings to exceed 2 times the limit established by a radioactivity discharge permit. This EAL will typically be associated with planned batch releases from non-continuous release pathways (e.g., radwaste, waste gas).

The effluent monitors listed are those normally used for planned discharges. If a discharge is performed using a different flowpath or effluent monitor other than those

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listed (e.g., a portable or temporary effluent monitor), then the declaration criteria will be based on the monitor specified in the Discharge Permit.

EAL #2 Basis:

~~EAL #1~~—This EAL addresses normally occurring continuous radioactivity releases from monitored gaseous ~~or liquid~~ effluent pathways.

EAL #3 Basis:

~~EAL #3~~—This EAL addresses uncontrolled gaseous or liquid releases that are detected by sample analyses or environmental surveys, particularly on unmonitored pathways (e.g., spills of radioactive liquids into storm drains, heat exchanger leakage in river water systems, etc.).

Escalation of the emergency classification level would be via IC ~~RAA1~~.

Basis Reference(s):

1. NEI 99-01 Rev 6, AU1
2. UFSAR Section 11.5.2.3
3. 0BISR 11.a.3-002, Channel Operation Test of Liquid Radwaste Effluent Radiation Monitor 0PR01J
4. ODCM, CY-BY-170-301, Section 3.0, Liquid Effluents
5. EP-EAL-0602 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Byron Station

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ARA2

Initiating Condition:

Significant lowering of water level above, or damage to, irradiated fuel.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

- ~~(1) — Uncovery of irradiated fuel in the REFUELING PATHWAY.~~
- ~~(2) — Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by **ANY** of the following radiation monitors:

—— (site specific listing of radiation monitors, and the associated readings, setpoints and/or alarms)~~
- ~~(3) — Lowering of spent fuel pool level to (site specific Level 2 value). [See Developer Notes]~~

1. Uncovery of irradiated fuel in the REFUELING PATHWAY.

OR

2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by **ANY** Table R1 Radiation Monitor reading **>1000 mRem/hr**

Table R1 Fuel Handling Incident Radiation Monitors
<ul style="list-style-type: none"> • Fuel Building Fuel Handling Incident Monitor 0RE-AR055 • Fuel Building Fuel Handling Incident Monitor 0RE-AR056 • Containment Fuel Handling Incident Monitor 1/2RE-AR011 • Containment Fuel Handling Incident Monitor 1/2RE-AR012

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Basis:

REFUELING PATHWAY: all the cavities, tubes, canals and pools through which irradiated fuel may be moved or stored, but not including the reactor vessel below the flange.

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

CONFINEMENT BOUNDARY: The irradiated fuel dry storage cask barrier(s) between areas containing radioactive substances and the environment.

This IC addresses events that have caused IMMEDIATE or actual damage to an irradiated fuel assembly, ~~or a significant lowering of water level within the spent fuel pool (see Developer Notes).~~ These events present radiological safety challenges to plant personnel and are precursors to a release of radioactivity to the environment. As such, they represent an actual or potential substantial degradation of the level of safety of the plant.

This IC applies to irradiated fuel that is licensed for dry storage up to the point that the loaded storage cask is sealed. Once sealed, damage to a loaded cask causing loss of the CONFINEMENT BOUNDARY is classified in accordance with IC E-HU1.

Escalation of the emergency would be based on either Recognition Category A or C ICs.

EAL #1 Basis:**EAL #1**

This EAL escalates from RAU2 in that the loss of level, in the affected portion of the REFUELING PATHWAY, is of sufficient magnitude to have resulted in uncover of irradiated fuel. Indications of irradiated fuel uncover may include direct or indirect visual observation (e.g., reports from personnel or camera images), as well as significant changes in water and radiation levels, or other plant parameters. Computational aids may also be used (e.g., a boil-off curve). Classification of an event using this EAL should be based on the totality of available indications, reports and observations.

While an area radiation monitor could detect an ~~increase~~rise in a dose rate due to a lowering of water level in some portion of the REFUELING PATHWAY, the reading may not be a reliable indication of whether or not the fuel is actually uncovered. To the degree possible, readings should be considered in combination with other available indications of inventory loss.

A drop in water level above irradiated fuel within the reactor vessel may be classified in accordance Recognition Category C during the Cold Shutdown and Refueling modes.

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EAL #2 Basis:**EAL #2**

This EAL addresses a release of radioactive material caused by mechanical damage to irradiated fuel. Damaging events may include the dropping, bumping or binding of an assembly, or dropping a heavy load onto an assembly. A rise in readings on radiation monitors should be considered in conjunction with in-plant reports or observations of a potential fuel damaging event (e.g., a fuel handling accident).

Escalation of the emergency would be based on either Recognition Category ~~RA~~ or C ICs.

EAL #3

~~Spent fuel pool water level at this value is within the lower end of the level range necessary to prevent significant dose consequences from direct gamma radiation to personnel performing operations in the vicinity of the spent fuel pool. This condition reflects a significant loss of spent fuel pool water inventory and thus it is also a precursor to a loss of the ability to adequately cool the irradiated fuel assemblies stored in the pool.~~

~~Escalation of the emergency classification level would be via ICs AS1 or AS2 (see AS2 Developer Notes).~~

Basis Reference(s):

1. NEI 99-01 Rev 6, AA2
2. UFSAR 11.5.2.2.6, 11.5.2.2.7, 15.7.4, Table 12.3-3
3. Technical Specification Table 3.3.6-1
4. 1/2 BOA REFUEL-1 Fuel Handling Emergency Unit 1/2
5. 1/2 BOA REFUEL-2 Refueling Cavity or Spent Fuel Pool Level Loss Unit 1/2
6. TRM 3.9.A, Refueling Operations, Decay Time
7. BAR 1-1-A2, 2-1-A2, CNMT DRAIN LEAK DETECT FLOW HIGH alarm

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

ARU2

Initiating Condition:

UNPLANNED loss of water level above irradiated fuel.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

~~(1) a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following:~~

~~(site-specific level indications).~~

~~AND~~

~~b. UNPLANNED rise in area radiation levels as indicated by ANY of the following radiation monitors.~~

~~(site-specific list of area radiation monitors)~~

1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following:

- Refueling Cavity water level < 23 ft. above the Reactor Flange (< 423 ft. indicated level).

OR

- Spent Fuel Pool water level < 23 ft. above the fuel (< 422 ft. 9 in. indicated level).

OR

- Indication or report of a drop in water level in the REFUELING PATHWAY.

AND

b. UNPLANNED Area Radiation Monitor reading rise on ANY radiation monitors in Table R1.

Table R1 - Fuel Handling Incident Radiation Monitors

<ul style="list-style-type: none"> • Fuel Building Fuel Handling Incident Monitor 0RE-AR055 • Fuel Building Fuel Handling Incident Monitor 0RE-AR056 • Containment Fuel Handling Incident Monitor 1/2RE-AR011 • Containment Fuel Handling Incident Monitor 1/2RE-AR012
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UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

REFUELING PATHWAY: all the cavities, tubes, canals and pools through which irradiated fuel may be moved or stored, but not including the reactor vessel below the flange.

This IC addresses a **decrease-loss** in water level above irradiated fuel sufficient to cause elevated radiation levels. This condition could be a precursor to a more serious event and is also indicative of a minor loss in the ability to control radiation levels within the plant. It is therefore a potential degradation in the level of safety of the plant.

A water level **decrease-loss** will be primarily determined by indications from available level instrumentation. Other sources of level indications may include reports from plant personnel (e.g., from a refueling crew) or video camera observations (if available) **or from any other temporarily installed monitoring instrumentation**. A significant drop in the water level may also cause an **increaserise** in the radiation levels of adjacent areas that can be detected by monitors in those locations.

The effects of planned evolutions should be considered. For example, a refueling bridge area radiation monitor reading may **increaserise** due to planned evolutions such as lifting of the reactor vessel head or movement of a fuel assembly. Note that this EAL is applicable only in cases where the elevated reading is due to an UNPLANNED loss of water level.

A drop in water level above irradiated fuel within the reactor vessel may be classified in accordance Recognition Category C during the Cold Shutdown and Refueling modes.

Escalation of the emergency classification level would be via IC **RAA2**.

Basis Reference(s):

1. NEI 99-01 Rev 6, AU2
2. Technical Specifications 3.7.14
3. 1/2 BOA REFUEL-1 Fuel Handling Emergency Unit 1/2
4. 1/2 BOA REFUEL-2 Refueling Cavity Or Spent Fuel Pool Level Loss Unit 1/2
5. BAR 1-1-C1 SPENT FUEL PIT LEVEL HIGH LOW
6. 1/2 BOSR 0.1-6 Unit One(Two) Mode 6 Shiftly and Daily Operating Surveillance
7. BOP RH-8 Filling the Refueling Cavity for Refueling
8. BOP RH-9 Pump Down of the Refueling Cavity to the RWST
9. BOP RC-4 Reactor Coolant System Drain
10. BAR 1-6-C3 REFUELING CAVITY LVL HIGH/LOW

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

ARA3

Initiating Condition:

Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Note: If the equipment in the ~~listed~~ room or area **listed in Table R3** was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted

~~(1) Dose rate greater than 15 mR/hr in ANY of the following areas:~~

- ~~• Control Room~~
- ~~• Central Alarm Station~~
- ~~• (other site specific areas/rooms)~~

~~(2) An UNPLANNED event results in radiation levels that prohibit or impede access to any of the following plant rooms or areas:~~

~~(site specific list of plant rooms or areas with entry related mode applicability identified)~~

1. Dose rate greater than **> 15 mR/hr** in **ANY** of the following Table R2 areas:

Table R2 Areas Requiring Continuous Occupancy
<ul style="list-style-type: none"> • Main Control Room – 1/2RE-AR010 • Central Alarm Station – (by survey)

OR

RECOGNITION CATEGORY

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

2. UNPLANNED event results in radiation levels that prohibit or significantly impede access to any of the following Table R3 plant rooms or areas:

Table R3	
Areas with Entry Related Mode Applicability	
Area	Entry Related Mode Applicability
Auxiliary Building*	Mode 4, 5 and 6
*Areas required to establish shutdown cooling	

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses elevated radiation levels in certain plant rooms/areas sufficient to preclude or impede personnel from performing actions necessary to **transition the plant from normal plant operation to cooldown and shutdown as specified in normal plant procedures**~~maintain normal plant operation, or to perform a normal plant cooldown and shutdown~~. As such, it represents an actual or potential substantial degradation of the level of safety of the plant. The Emergency Director should consider the cause of the increased radiation levels and determine if another IC may be applicable.

Table R3 is a list of plant rooms or areas with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal operating procedures (establish shutdown cooling), where if this action is not completed the plant would not be able to attain and maintain cold shutdown. This Table does not include rooms or areas for which entry is required solely to perform actions of an administrative or record keeping nature (e.g., normal rounds or routine inspections).

Rooms and areas listed in EAL #1 do not need to be included in EAL #2, including the Control Room.

For EAL #2, an Alert declaration is warranted if entry into the affected room/area is, or may be, procedurally required during the plant operating mode in effect **and the elevated radiation levels preclude the ability to place shutdown cooling in service**~~at the time of the elevated radiation levels~~. The emergency classification is not contingent upon whether entry is actually necessary at the time of the increased radiation levels. Access should be considered as impeded if extraordinary measures are necessary to facilitate entry of personnel into the affected room/area (e.g., installing temporary shielding **beyond that required by procedure**, requiring use of non-routine protective equipment, requesting an

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extension in dose limits beyond normal administrative limits).

An emergency declaration is not warranted if any of the following conditions apply.

- The plant is in an operating mode different than the mode specified for the affected room/area (i.e., entry is not required during the operating mode in effect at the time of the elevated radiation levels). For example, the plant is in Mode 1 when the radiation **increaserise** occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.
- The increased radiation levels are a result of a planned activity that includes compensatory measures which address the temporary inaccessibility of a room or area (e.g., radiography, spent filter or resin transfer, etc.).
- The action for which room/area entry is required is of an administrative or record keeping nature (e.g., normal rounds or routine inspections).
- The access control measures are of a conservative or precautionary nature, and would not actually prevent or impede a required action.

Escalation of the emergency classification level would be via Recognition Category **RA**, C or F ICs.

Basis Reference(s):

1. NEI 99-01 Rev 6, AA3
2. UFSAR Chapter 3.02, UFSAR Table 3.2-1

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

SRU3**Initiating Condition:**

Reactor coolant activity greater than Technical Specification allowable limits.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

~~(1) — (Site-specific radiation monitor) reading greater than (site-specific value).~~

~~(2) — Sample analysis indicates that a reactor coolant activity value is greater than an allowable limit specified in Technical Specifications.~~

1. Gross Failed Fuel Monitor 1/2RE-PR006 (1/2 PS206-High Energy) indicating I-135 concentration **> 5 uCi/cc.**

OR

2. Sample analysis indicates that:

a. Dose Equivalent I-131 specific coolant activity **> 60.0 uCi/gm.**

OR

b. Dose Equivalent XE-133 specific coolant activity **> 603.0 uCi/gm.**

Basis:

This IC addresses a reactor coolant activity value that exceeds an allowable limit specified in Technical Specifications. This condition is a precursor to a more significant event and represents a potential degradation of the level of safety of the plant.

Conditions that cause the specified monitor to alarm that are not related to fuel clad degradation should not result in the declaration of an Unusual Event.

This EAL addresses site-specific radiation monitor readings that provide indication of a degradation of fuel clad integrity.

An Unusual Event is only warranted when actual fuel clad damage is the cause of the elevated coolant sample activity (as determined by laboratory confirmation). Fuel clad damage should be assumed to be the cause of elevated Reactor Coolant activity unless another cause is known.

Escalation of the emergency classification level would be via ICs FA1 or the Recognition Category **RA** ICs.

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ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

Basis Reference(s):

1. NEI 99-01 Rev 6, SU3
2. Technical Specifications 3.4.16
3. 1/2BOA PRI-4, High Reactor Coolant Activity Unit 1/2
4. PWR Letdown Rad Monitor Setpoint Calculation for Degraded Fuel Indication

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FG1**Initiating Condition:**

Loss of ANY Two Barriers AND Loss or Potential Loss of the third barrier.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the General Emergency classification level each barrier is weighted equally.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FS1

Initiating Condition:

Loss or Potential Loss of ANY two barriers.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the Site Area Emergency classification level, each barrier is weighted equally.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FA1**Initiating Condition:**

ANY Loss or ANY Potential Loss of either Fuel Clad or RCS.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the Alert classification level, Fuel Cladding and RCS barriers are weighted more heavily than the Containment barrier. Unlike the Containment barrier, loss or potential loss of either the Fuel Cladding or RCS barrier may result in the relocation of radioactive materials or degradation of core cooling capability. Note that the loss or potential loss of Containment barrier in combination with loss or potential loss of either Fuel Cladding or RCS barrier results in declaration of a Site Area Emergency under EAL FS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:POTENTIAL LOSS~~A. RCS/reactor vessel level less than (site-specific value).~~Core Cooling **CFSCSF-Orange Path** conditions exist**Basis:**

There is no Loss threshold associated with RCS or SG Tube Leakage.

Potential Loss Threshold Basis

Core Cooling - ORANGE indicates subcooling has been lost and that some clad damage may occur.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2 BFR-C.2 Response to Degraded Core Cooling Unit 1/2

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC2

Initiating Condition:

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:

LOSS

~~A. Core Exit Thermocouple readings greater than (site specific temperature value)~~

1. Core-Cooling CSF- Red Path conditions exist .

Potential Loss

~~A. Core exit thermocouple readings greater than (site specific temperature value).~~

~~B. Inadequate RCS heat removal capability via steam generators as indicated by (site specific indications).~~

2. Core Cooling CSF-Orange Path conditions exist.

OR

3. Heat Sink CSF- Red Path conditions exist.

Basis:

Loss Threshold #1 Basis

Loss 2.A

~~This reading~~ indicates temperatures within the core are sufficient to cause significant superheating of reactor coolant.

Core Cooling - RED indicates significant superheating and core uncover and is considered to indicate loss of the Fuel Clad Barrier.

Potential Loss Threshold #2 Basis

Potential Loss 2.A

~~This reading~~ indicates temperatures within the core are sufficient to allow the onset of heat-induced cladding damage.

Core Cooling - ORANGE indicates subcooling has been lost and that some clad damage may occur.

Potential Loss Threshold #3 Basis

Potential Loss 2.B

This condition indicates an extreme challenge to the ability to remove RCS heat using the steam generators (i.e., loss of an effective secondary-side heat sink). This condition represents a potential loss of the Fuel Clad Barrier. **The Heat Sink Critical Safety**

RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION

Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm. In accordance with EOPs, there may be unusual accident conditions during which operators intentionally reduce the heat removal capability of the steam generators by reducing total feed flow to less than 500 gpm; during these conditions, classification using threshold is not warranted.

Meeting this threshold results in a Site Area Emergency because this threshold is identical to RCS Barrier RC 2 Potential Loss threshold 2-A; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal may result in fuel heat-up sufficient to damage the cladding and increase RCS pressure to the point where mass will be lost from the system.

Heat Sink - RED when heat sink is required indicates the ultimate heat sink function is under extreme challenge.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2 BST-2 Core Cooling Unit 1/2
3. 1/2 BFR-C.1 Response to Inadequate Core Cooling Unit 1/2
4. 1/2 BFR-C.2 Response to Degraded Core Cooling Unit 1/2
5. 1/2 BST-3 Heat Sink Unit 1/2
6. 1/2 BFR H.1, Response to Loss of Secondary Heat Sink Unit 1/2

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC3

Initiating Condition:

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:

LOSS

1A. Containment radiation monitor ~~reading greater than (site specific value)~~
(AR020(21)) reading > **1.95E+03 R/hr.**

OR

2B. ~~(Site specific indications that reactor coolant activity is greater than 300uCi/gm dose equivalent I-131)~~ Coolant activity as sampled > **300uCi/gm Dose Equivalent I-131**

Basis:

Loss Threshold #1 Basis

Loss 3.A

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that reactor coolant activity equals 300 μ Ci/gm dose equivalent I-131. Reactor coolant activity above this level is greater than that expected for iodine spikes and corresponds to an approximate range of 2% to 5% fuel clad damage. Since this condition indicates that a significant amount of fuel clad damage has occurred, it represents a loss of the Fuel Clad Barrier.

The radiation monitor reading in this threshold is higher than that specified for RCS Barrier **RC3 Loss Threshold 3.A** since it indicates a loss of both the Fuel Clad Barrier and the RCS Barrier. Note that a combination of the two monitor readings appropriately escalates the emergency classification level to a Site Area Emergency.

Loss Threshold #2 Basis

Loss 3.B

This threshold indicates that RCS radioactivity concentration is greater than 300 μ Ci/gm dose equivalent I-131. Reactor coolant activity above this level is greater than that expected for iodine spikes and corresponds to an approximate range of 2% to 5% fuel clad damage. Since this condition indicates that a significant amount of fuel clad damage has occurred, it represents a loss of the Fuel Clad Barrier.

It is recognized that sample collection and analysis of reactor coolant with highly elevated activity levels could require several hours to complete. Nonetheless, a sample-related threshold is included as a backup to other indications

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

There is no Potential Loss threshold associated with RCS Activity / Containment | Radiation.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. S&L calculation BB-ER-02, Rev 0
3. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION****FC56****Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS

1A. Any condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.

POTENTIAL LOSS

2A. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.

Basis:**Loss Threshold #1 Basis**Loss 6.A

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Fuel Clad Barrier is lost.

Potential Loss Threshold #2 BasisPotential Loss 6.A

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Fuel Clad Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS

~~A.1. An~~ ~~A~~ automatic or manual ~~EGCS~~ (SI) actuation is required by **EITHER** of the following:

~~a1.~~ UNISOLABLE RCS leakage

OR

~~b2.~~ Steam Generator tube RUPTURE.

POTENTIAL LOSS

~~B.2.~~ The capacity of one charging pump in the normal charging mode is exceeded due to **EITHER** of the following: ~~Operation of a standby charging (makeup) pump is required by EITHER of the following:~~

~~a1.~~ UNISOLABLE RCS leakage

OR

~~b2.~~ Steam Generator tube leakage tube RUPTURE.

OR

~~B.~~ ~~RCS~~ cooldown rate greater than (site specific pressurized thermal shock criteria/limits defined by site specific indications)

3. RCS Integrity CSF- Red Path entry conditions ~~met~~ exist.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

Basis:

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

RUPTURE(D): The condition of a steam generator in which primary-to-secondary leakage is of sufficient magnitude to require a safety injection.

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

Loss Threshold #1 Basis**Loss 1.A**

This threshold is based on an UNISOLABLE RCS leak of sufficient size to require an automatic or manual actuation of the Emergency Core Cooling System (ECCS). This condition clearly represents a loss of the RCS Barrier.

This threshold is applicable to unidentified and pressure boundary leakage, as well as identified leakage. It is also applicable to UNISOLABLE RCS leakage through an interfacing system. The mass loss may be into any location – inside containment, to the secondary-side (i.e., steam generator tube leakage) or outside of containment.

A steam generator with primary-to-secondary leakage of sufficient magnitude to require a safety injection is considered to be RUPTURED. If a RUPTURED steam generator is also FAULTED outside of containment, the declaration escalates to a Site Area Emergency since the Containment Barrier **CT1** Loss threshold **1.A** will also be met.

Potential Loss Threshold #2 Basis**Potential Loss 1.A**

This threshold is based on an UNISOLABLE RCS leak that results in the inability to maintain pressurizer level within specified limits by operation of a normally used charging (makeup) pump, but an ECCS (SI) actuation has not occurred. The threshold is met when an operating procedure, or operating crew supervision, directs that a standby charging (makeup) pump be placed in service to restore and maintain pressurizer level.

This threshold is applicable to unidentified and pressure boundary leakage, as well as identified leakage. It is also applicable to UNISOLABLE RCS leakage through an interfacing system. The mass loss may be into any location – inside containment, to the secondary-side (i.e., steam generator tube leakage) or outside of containment.

RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION

If a leaking steam generator is also FAULTED outside of containment, the declaration escalates to a Site Area Emergency since the Containment Barrier **CT1 Loss Threshold 1.A** will also be met.

Potential Loss 1.B

Potential Loss Threshold #3 Basis

This condition indicates an extreme challenge to the integrity of the RCS pressure boundary due to pressurized thermal shock – a transient that causes rapid RCS cooldown while the RCS is in Mode 3 or higher (i.e., hot and pressurized).

RCS Integrity - RED indicates an extreme challenge to the safety function derived from appropriate instrument readings.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
3. 1/2 BEP-0 Reactor Trip Or Safety Injection Unit 1/2
4. 1/2 BEP-3 Steam Generator Tube Rupture Unit 1/2
5. 1/2 BST-2 Core Cooling Unit 1/2
6. 1/2 BFR-C.1 Response to Inadequate Core Cooling Unit 1/2
7. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
8. UFSAR Fig. 6.3-4

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC2

Initiating Condition:

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:

POTENTIAL LOSS

~~A. Inadequate RCS heat removal capability via steam generators as indicated by (site specific indications)~~

Heat Sink CSF- Red Path entry conditions existmet.

Basis:

There is no Loss threshold associated with Inadequate Heat Removal.

Potential Loss Threshold Basis

Potential Loss 2.A

Heat Sink - RED when heat sink is required indicates the ultimate heat sink function is under extreme challenge.

This condition indicates an extreme challenge to the ability to remove RCS heat using the steam generators (i.e., loss of an effective secondary-side heat sink). This condition represents a potential loss of the RCS Barrier. **The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm.** In accordance with EOPs, there may be unusual accident conditions during which operators intentionally reduce the heat removal capability of the steam generators **by reducing total feed flow to less than 500 gpm;** during these conditions, classification using threshold is not warranted.

Meeting this threshold results in a Site Area Emergency because this threshold is identical to Fuel Clad Barrier **FC2** Potential Loss threshold **2.B#3**; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal may result in fuel heat-up sufficient to damage the cladding and **increaserise** RCS pressure to the point where mass will be lost from the system.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2 BST-3 Heat Sink Unit 1/2

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION****RC3****Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS

A. Containment radiation monitor ~~reading greater than (AR020(21)) reading > 25 R/hr.~~
~~(site specific value).~~

Basis:**Loss Threshold Basis**Loss 3.A

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that reactor coolant activity equals Technical Specification allowable limits. This value is lower than that specified for Fuel Clad Barrier **FC3** Loss ~~Threshold #13.A~~ since it indicates a loss of the RCS Barrier only.

There is no Potential Loss threshold associated with RCS Activity / Containment Radiation.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION****RC56****Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS

1A. Any condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.

POTENTIAL LOSS

2B. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.

Basis:**Loss Threshold #1 Basis**Loss 6.A

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the RCS Barrier is lost.

Potential Loss Threshold #2 BasisPotential Loss 6.A

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the RCS Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT1

Initiating Condition:

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:

LOSS

A. A leaking or RUPTURED SG is FAULTED outside of containment.

Basis:

RUPTURE(D): The condition of a steam generator in which primary-to-secondary leakage is of sufficient magnitude to require a safety injection.

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

Loss Threshold Basis

Loss 1.A

This threshold addresses a leaking or RUPTURED Steam Generator (SG) that is also FAULTED outside of containment. The condition of the SG, whether leaking or RUPTURED, is determined in accordance with the thresholds for RCS Barrier **RC1** Potential Loss **Threshold 2.b 4.A** and Loss **Threshold 1.b.A**, respectively. This condition represents a bypass of the containment barrier.

FAULTED is a defined term within the NEI 99-01 methodology; this determination is not necessarily dependent upon entry into, or diagnostic steps within, an EOP. For example, if the pressure in a steam generator is decreasing uncontrollably [*part of the FAULTED definition*] and the faulted steam generator isolation procedure is not entered because EOP user rules are dictating implementation of another procedure to address a higher priority condition, the steam generator is still considered FAULTED for emergency classification purposes.

The FAULTED criterion establishes an appropriate lower bound on the size of a steam release that may require an emergency classification. Steam releases of this size are readily observable with normal Control Room indications. The lower bound for this aspect of the containment barrier is analogous to the lower bound criteria specified in IC **RSU3** for the fuel clad barrier (i.e., RCS activity values) and IC **MSU64** for the RCS barrier (i.e., RCS leak rate values).

This threshold also applies to prolonged steam releases necessitated by operational considerations such as the forced steaming of a leaking or RUPTURED steam generator directly to atmosphere to cooldown the plant, or to drive an auxiliary (emergency) feed water pump. These types of conditions will result in a significant and

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

sustained release of radioactive steam to the environment (and are thus similar to a FAULTED condition). The inability to isolate the steam flow without an adverse effect on plant cooldown meets the intent of a loss of containment.

Steam releases associated with the expected operation of a SG power operated relief valve or safety relief valve do not meet the intent of this threshold. Such releases may occur intermittently for a short period of time following a reactor trip as operators process through emergency operating procedures to bring the plant to a stable condition and prepare to initiate a plant cooldown. Steam releases associated with the unexpected operation of a valve (e.g., a stuck-open safety valve) do meet this threshold.

Following an SG tube leak or rupture, there may be minor radiological releases through a secondary-side system component (e.g., air ejectors, gland seal exhausters, valve packing, etc.). These types of releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category **RA** ICs.

The emergency classification levels resulting from primary-to-secondary leakage, with or without a steam release from the FAULTED SG, are summarized below.

Primary-to-Secondary Leak Rate	Affected SG is FAULTED Outside of Containment?	
	Yes	No
Less than or equal to 25 gpm (or other value per SU4 Developer Notes)	No classification	No classification
Greater than 25 gpm (or other value per SU4 Developer Notes)	Unusual Event per SU4MU6	Unusual Event per SU4MU6
The capacity of one charging pump in the normal charging mode is exceeded Requires operation of a standby charging (makeup) pump (RCS Barrier Potential Loss)	Site Area Emergency per FS1	Alert per FA1
Requires an automatic or manual EGCS (SI) actuation <i>(RCS Barrier Loss)</i>	Site Area Emergency per FS1	Alert per FA1

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

There is no Potential Loss threshold associated with RCS or SG Tube Leakage.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2 BEP-0 Reactor Trip Or Safety Injection Unit 1/2
3. 1/2 BEP-3 Steam Generator Tube Rupture Unit 1/2
4. 1/2 BOA SEC-8 Steam Generator Tube Leak Unit 1/2

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT2

Initiating Condition:

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:

POTENTIAL LOSS

~~A. 1. (Site specific criteria for entry into core cooling restoration procedure)~~

AND

~~—2. Restoration procedure not effective within 15 minutes.~~

Core-Cooling CSF- Red Path conditions exist **AND** Functional Restoration procedures **not** effective in **< 15 minutes**.

Basis:

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

There is no Loss threshold associated with Inadequate Heat Removal.

Potential Loss Threshold Basis

Potential Loss 2.A

This condition represents an IMMEDIATE core melt sequence which, if not corrected, could lead to vessel failure and an increased potential for containment failure. For this condition to occur, there must already have been a loss of the RCS Barrier and the Fuel Clad Barrier. If implementation of a procedure(s) to restore adequate core cooling is not effective (successful) within 15 minutes, it is assumed that the event trajectory will likely lead to core melting and a subsequent challenge of the Containment Barrier.

The restoration procedure is considered "effective" if core exit thermocouple readings are decreasing and/or if reactor vessel level is increasing. Whether or not the procedure(s) will be effective should be apparent within 15 minutes. The Emergency Director should escalate the emergency classification level as soon as it is determined that the procedure(s) will not be effective.

Severe accident analyses (e.g., NUREG-1150) have concluded that function restoration procedures can arrest core degradation in a significant fraction of core damage scenarios, and that the likelihood of containment failure is very small in these events. Given this, it is appropriate to provide 15 minutes beyond the required entry point to determine if procedural actions can reverse the core melt sequence.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2 BST-2 Core Cooling Unit 1/2
3. 1/2 BFR-C.1 Response to Inadequate Core Cooling Unit 1/2

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT3**Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:POTENTIAL LOSS

A. Containment radiation monitor ~~reading greater than (AR020(21))~~ reading > 4.40E+03 R/hr. ~~(site specific value).~~

Basis:

There is no Loss threshold associated with RCS Activity / Containment Radiation.

Potential Loss Threshold BasisPotential Loss 3.A

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that 20% of the fuel cladding has failed. This level of fuel clad failure is well above that used to determine the analogous Fuel Clad Barrier Loss and RCS Barrier Loss thresholds.

NUREG-1228, *Source Estimations During Incident Response to Severe Nuclear Power Plant Accidents*, indicates the fuel clad failure must be greater than approximately 20% in order for there to be a major release of radioactivity requiring offsite protective actions. For this condition to exist, there must already have been a loss of the RCS Barrier and the Fuel Clad Barrier. It is therefore prudent to treat this condition as a potential loss of containment which would then escalate the emergency classification level to a General Emergency.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4

Initiating Condition:

Containment Integrity or Bypass

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:

LOSS

1A. Containment isolation is required **AND EITHER** of the following:

a1. UNPLANNED ~~decrease-lowering~~ in containment pressure or rise in radiation monitor readings outside of containment **in the Emergency Directors judgment that** indicate a loss of containment integrity.

OR

b2. UNISOLABLE pathway from containment to the environment exists.

OR

2B. Indication of RCS leakage outside of containment

POTENTIAL LOSS

3A. Containment **CSF Red Path entry** conditions ~~met~~ exist

OR

4B. ~~Explosive mixture exists inside containment.~~ Hydrogen Concentration in Containment $\geq 5\%$.

OR

5C. a1. Containment pressure ~~greater than (site specific pressure setpoint)~~ ≥ 20 psig

AND

b2. Less than one full train of ~~(site specific system or equipment)~~ Containment Spray is operating per design for ≥ 15 minutes ~~or longer~~.

Basis:

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

Loss Threshold #1 Basis:

Loss 4.A

RECOGNITION CATEGORY FISSION PRODUCT BARRIER DEGRADATION

These thresholds address a situation where containment isolation is required and one of two conditions exists as discussed below. Users are reminded that there may be accident and release conditions that simultaneously meet both **loss** thresholds **1.a4.A.1** and **1.b4.A.2**.

1.a4.A.1 – Containment integrity has been lost, i.e., the actual containment atmospheric leak rate likely exceeds that associated with allowable leakage (or sometimes referred to as design leakage). Following the release of RCS mass into containment, containment pressure will fluctuate based on a variety of factors; a loss of containment integrity condition may (or may not) be accompanied by a noticeable drop in containment pressure. Recognizing the inherent difficulties in determining a containment leak rate during accident conditions, it is expected that the Emergency Director will assess this threshold using judgment, and with due consideration given to current plant conditions, and available operational and radiological data (e.g., containment pressure, readings on radiation monitors outside containment, operating status of containment pressure control equipment, etc.).

Refer to the middle piping run of Figure 9-F-4. Two simplified examples are provided. One is leakage from a penetration and the other is leakage from an in-service system valve. Depending upon radiation monitor locations and sensitivities, the leakage could be detected by any of the four monitors depicted in the figure.

Another example would be a loss or potential loss of the RCS barrier, and the simultaneous occurrence of two FAULTED locations on a steam generator where one fault is located inside containment (e.g., on a steam or feedwater line) and the other outside of containment. In this case, the associated steam line provides a pathway for the containment atmosphere to escape to an area outside the containment.

Following the leakage of RCS mass into containment and a rise in containment pressure, there may be minor radiological releases associated with allowable (design) containment leakage through various penetrations or system components. These releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category **RA** ICs.

1.b4.A.2 – Conditions are such that there is an UNISOLABLE pathway for the migration of radioactive material from the containment atmosphere to the environment. As used here, the term “environment” includes the atmosphere of a room or area, outside the containment, that may, in turn, communicate with the outside-the-plant atmosphere (e.g., through discharge of a ventilation system or atmospheric leakage). Depending upon a variety of factors, this condition may or may not be accompanied by a noticeable drop in containment pressure.

Refer to the top piping run of Figure 9-F-4. In this simplified example, the inboard and outboard isolation valves remained open after a containment isolation was required (i.e., containment isolation was not successful). There is now an UNISOLABLE pathway from the containment to the environment.

RECOGNITION CATEGORY FISSION PRODUCT BARRIER DEGRADATION

The existence of a filter is not considered in the threshold assessment. Filters do not remove fission product noble gases. In addition, a filter could become ineffective due to iodine and/or particulate loading beyond design limits (i.e., retention ability has been exceeded) or water saturation from steam/high humidity in the release stream.

Leakage between two interfacing liquid systems, by itself, does not meet this threshold.

Refer to the bottom piping run of Figure 9-F-4. In this simplified example, leakage in an RCP seal cooler is allowing radioactive material to enter the Auxiliary Building. The radioactivity would be detected by the Process Monitor. If there is no leakage from the closed water cooling system to the Auxiliary Building, then no threshold has been met. If the pump or system piping developed a leak that allowed steam/water to enter the Auxiliary Building, then **loss** threshold **24.B** would be met. Depending upon radiation monitor locations and sensitivities, this leakage could be detected by any of the four monitors depicted in the figure and cause threshold **1.a4.A.1** to be met as well.

Following the leakage of RCS mass into containment and a rise in containment pressure, there may be minor radiological releases associated with allowable (design) containment leakage through various penetrations or system components. Minor releases may also occur if a containment isolation valve(s) fails to close but the containment atmosphere escapes to a closed system. These releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category **RA** ICs.

The status of the containment barrier during an event involving steam generator tube leakage is assessed using **Containment Barrier CT1Loss Threshold-4.A**.

Loss Threshold #2 Basis:

Loss 4.B

Containment sump, temperature, pressure and/or radiation levels will **increaserise** if reactor coolant mass is leaking into the containment. If these parameters have not increased, then the reactor coolant mass may be leaking outside of containment (i.e., a containment bypass sequence). **IncreaseRises** in sump, temperature, pressure, flow and/or radiation level readings outside of the containment may indicate that the RCS mass is being lost outside of containment.

Unexpected elevated readings and alarms on radiation monitors with detectors outside containment should be corroborated with other available indications to confirm that the source is a loss of RCS mass outside of containment. If the fuel clad barrier has not been lost, radiation monitor readings outside of containment may not **increaserise** significantly; however, other unexpected changes in sump levels, area temperatures or pressures, flow rates, etc. should be sufficient to determine if RCS mass is being lost outside of the containment.

Refer to the middle piping run of Figure 9-F-4. In this simplified example, a leak has occurred at a reducer on a pipe carrying reactor coolant in the Auxiliary Building.

RECOGNITION CATEGORY FISSION PRODUCT BARRIER DEGRADATION

Depending upon radiation monitor locations and sensitivities, the leakage could be detected by any of the four monitors depicted in the figure and cause **loss** threshold **1.a4.A.1** to be met as well.

To ensure proper escalation of the emergency classification, the RCS leakage outside of containment must be related to the mass loss that is causing the RCS **Barrier RC1 Loss Threshold 1.a** and/or Potential Loss threshold **2.a4.A** to be met.

Potential Loss Threshold #3 Basis

Potential Loss 4.A

Containment CSF RED path indicates an extreme challenge to the safety function derived from appropriate instrument readings and/or sampling results, and thus represents a potential loss of containment.

If containment pressure exceeds the design pressure, there exists a potential to lose the Containment Barrier. To reach this level, there must be an inadequate core cooling condition for an extended period of time; therefore, the RCS and Fuel Clad barriers would already be lost. Thus, this threshold is a discriminator between a Site Area Emergency and General Emergency since there is now a potential to lose the third barrier.

Potential Loss Threshold #4 Basis

Potential Loss 4.B

The existence of an explosive mixture means, at a minimum, that the containment atmospheric hydrogen concentration is sufficient to support a hydrogen burn (i.e., at the lower deflagration limit). A hydrogen burn will raise containment pressure and could result in collateral equipment damage leading to a loss of containment integrity. It therefore represents a potential loss of the Containment Barrier.

Potential Loss Threshold #5 Basis

Potential Loss 4.C

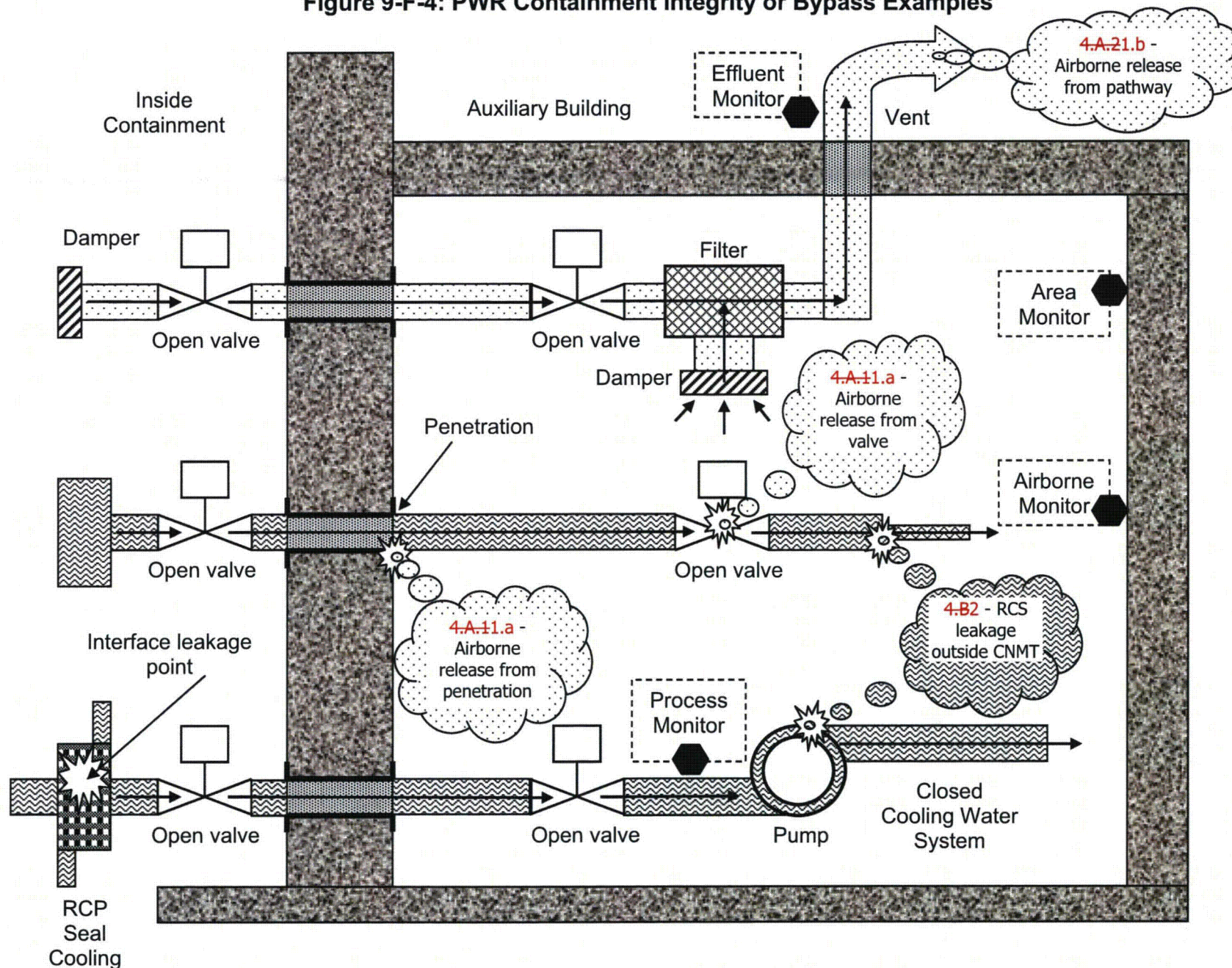
This threshold describes a condition where containment pressure is greater than the setpoint at which containment energy (heat) removal systems are designed to automatically actuate, and less than one full train of equipment is capable of operating per design. The 15-minute criterion is included to allow operators time to manually start equipment that may not have automatically started, if possible. This threshold represents a potential loss of containment in that containment heat removal/depressurization systems (e.g., containment sprays, ice condenser fans, etc., but not including containment venting strategies) are either lost or performing in a degraded manner

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. UFSAR Section 15.6.5.2.1
3. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
4. Technical Specifications B 3.6.6, Containment Spray and Cooling Systems
5. 1/2BST-5 Containment Unit 1/2

RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION
Figure 9-F-4: PWR Containment Integrity or Bypass Examples



**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION****CT56****Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS

1A. Any condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.

POTENTIAL LOSS

2B. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.

Basis:**Loss Threshold #1 Basis**Loss 6.A

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Containment Barrier is lost.

Potential Loss Threshold #2 BasisPotential Loss 6.A

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Containment Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

MSG1**Initiating Condition:**

Prolonged loss of all Off-site and all On-Site AC power to emergency ~~busses~~buses.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- ~~.The Emergency Director should declare the General Emergency promptly upon determining that (site-specific hours) has been exceeded, or will likely be exceeded.~~
- 1-a. Loss of **ALL** offsite ~~and ALL onsite~~ AC power to ~~(site-specific emergency buses)~~unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

- 3b. **EITHER** of the following:

- a. Restoration of at least one ~~emergency-unit~~ ESF bus in **< 4 hours** is not less than ~~(site-specific hours)~~ is not likely.

OR

- b. **Core Cooling CSF – Red Path** conditions exist
 - ~~(Site-specific indication of an inability to adequately remove heat from the core)~~

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a prolonged loss of all power sources to AC emergency buses. A loss of all AC power compromises the performance of all SAFETY SYSTEMS requiring

RECOGNITION CATEGORY SYSTEM MALFUNCTIONS

electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. A prolonged loss of these buses will lead to a loss of ~~one or more~~ any fission product barriers. In addition, fission product barrier monitoring capabilities may be degraded under these conditions.

The EAL should require declaration of a General Emergency prior to meeting the thresholds for IC FG1. This will allow additional time for implementation of offsite protective actions.

Escalation of the emergency classification from Site Area Emergency will occur if it is projected that power cannot be restored to at least one AC emergency bus by the end of the analyzed station blackout coping period. Beyond this time, plant responses and event trajectory are subject to greater uncertainty, and there is an increased likelihood of challenges to multiple fission product barriers.

The estimate for restoring at least one emergency bus should be based on a realistic appraisal of the situation. Mitigation actions with a low probability of success should not be used as a basis for delaying a classification upgrade. The goal is to maximize the time available to prepare for, and implement, protective actions for the public.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

The EAL will also require a General Emergency declaration if the loss of AC power results in parameters that indicate an inability to adequately remove decay heat from the core.

Basis Reference(s):

1. NEI 99-01 Rev 6, SG1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2 BOA ELEC-3 Loss Of 4KV ESF Bus Unit 1/2
5. 1/2 BOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2 BCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2 BCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2 BCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2 BCA-0.3 Response To Opposite Unit Loss Of All AC Power Unit 1/2
10. BOP AP-51, Isolating Unit 1 System AUX Transformer 142-1 & 142-2 While Unit Is At Power
11. BOP AP-52, Restoring Unit 1 System AUX Transformer 142-1 & 142-2 During Power Operation

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12. BOP AP-53, Isolating Unit 2 System AUX Transformer 242-1 & 242-2 While Unit Is At Power
13. BOP AP-54, Restoring Unit 2 System AUX Transformer 242-1 & 242-2 During Power Operation
14. Safety Evaluations of the Byron Station and Byron Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)
15. 1/2 BST-2 Core Cooling Unit 1/2
16. 1/2 BFR-C.1 Response to Inadequate Core Cooling Unit 1/2
17. 1/2 BFR-C.2 Response to Degraded Core Cooling Unit 1/2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

MSS1**Initiating Condition:**

Loss of all offsite and all onsite AC power to emergency ~~busses~~buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

~~The Emergency Director should declare the Site Area Emergency promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.~~

1. Loss of **ALL** offsite ~~and ALL onsite~~ AC Power to ~~(site-specific emergency buses)unit~~ ESF buses for 15 minutes or longer.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. Failure to restore power to at least one unit ESF bus in **< 15 minutes** from the time of loss of both offsite and onsite AC power

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a total loss of AC power that compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. In addition, fission product barrier monitoring capabilities may be degraded under these conditions. This IC represents a condition that involves actual or likely major failures of plant functions needed for the protection of the public.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via ICs RAG1, FG1 or MSG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SS1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2 BOA ELEC-3 Loss Of 4KV ESF Bus Unit 1/2
5. 1/2 BOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2 BCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2 BCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2 BCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2 BCA-0.3 Response To Opposite Unit Loss Of All AC Power Unit 1/2
10. BOP AP-51, Isolating Unit 1 System AUX Transformer 142-1 & 142-2 While Unit Is At Power
11. BOP AP-52, Restoring Unit 1 System AUX Transformer 142-1 & 142-2 During Power Operation
12. BOP AP-53, Isolating Unit 2 System AUX Transformer 242-1 & 242-2 While Unit Is At Power
13. BOP AP-54, Restoring Unit 2 System AUX Transformer 242-1 & 242-2 During Power Operation
14. Safety Evaluations of the Byron Station and Byron Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

MSA1**Initiating Condition:**

Loss of all but one AC power source to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. ~~The Emergency Director should declare the Alert promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.~~

1. AC power capability to unit ESF buses reduced to only one of the following power sources for **≥ 15 minutes**.
 - Affected unit SAT 142-1(242-1)
 - Affected unit SAT 142-2(242-2)
 - Emergency Diesel Generator DG 1A(2A)
 - Emergency Diesel Generator DG 1B(2B)
 - Unit crosstie breakers

~~a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer.~~

AND

- 2b. Any additional single power source failure will result in a loss of **ALL** AC power to SAFETY SYSTEMS.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC describes a significant degradation of offsite and onsite AC power sources such that any additional single failure would result in a loss of all AC power to SAFETY SYSTEMS. In this condition, the sole AC power source may be powering one, or more than one, train of safety-related equipment. This IC provides an escalation path from IC **MSU1**.

An "AC power source" is a source recognized in AOPs and EOPs, and capable of supplying required power to an emergency bus. Some examples of this condition are presented below.

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- A loss of all offsite power with a concurrent failure of all but one emergency power source (e.g., an onsite diesel generator).
- A loss of all offsite power and loss of all emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from the unit main generator.
- A loss of emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from an offsite power source.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of power.

Escalation of the emergency classification level would be via IC **MSS1**.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2 BOA ELEC-3 Loss Of 4KV ESF Bus Unit 1/2
5. 1/2 BOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2 BCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2 BCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2 BCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2 BCA-0.3 Response To Opposite Unit Loss Of All AC Power Unit 1/2
10. BOP AP-51, Isolating Unit 1 System AUX Transformer 142-1 & 142-2 While Unit Is At Power
11. BOP AP-52, Restoring Unit 1 System AUX Transformer 142-1 & 142-2 During Power Operation
12. BOP AP-53, Isolating Unit 2 System AUX Transformer 242-1 & 242-2 While Unit Is At Power
13. BOP AP-54, Restoring Unit 2 System AUX Transformer 242-1 & 242-2 During Power Operation
14. Safety Evaluations of the Byron Station and Byron Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MSU1****Initiating Condition:**

Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

~~——Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.~~

~~1. Loss of ALL offsite AC power capability to unit ESF buses (site-specific emergency buses) for \geq 15 minutes or longer.~~

Basis:

This IC addresses a prolonged loss of offsite power. The loss of offsite power sources renders the plant more vulnerable to a complete loss of power to AC emergency buses. This condition represents a potential reduction in the level of safety of the plant.

For emergency classification purposes, "capability" means that an offsite AC power source(s) is available to the emergency buses, whether or not the buses are powered from it. (e.g. unit cross-tie breakers)

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of offsite power.

Escalation of the emergency classification level would be via IC **MSA1**.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2 BOA ELEC-3 Loss Of 4KV ESF Bus Unit 1/2
5. 1/2 BOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2 BCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2 BCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2 BCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2

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9. 1/2 BCA-0.3 Response To Opposite Unit Loss Of All AC Power Unit 1/2
10. BOP AP-51, Isolating Unit 1 System AUX Transformer 142-1 & 142-2 While Unit Is At Power
11. BOP AP-52, Restoring Unit 1 System AUX Transformer 142-1 & 142-2 During Power Operation
12. BOP AP-53, Isolating Unit 2 System AUX Transformer 242-1 & 242-2 While Unit Is At Power
13. BOP AP-54, Restoring Unit 2 System AUX Transformer 242-1 & 242-2 During Power Operation

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MSG28****Initiating Condition:**

Loss of all AC and Vital DC power sources for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. ~~The Emergency Director should declare the General Emergency promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.~~

1. Loss of **ALL** offsite AC power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. Voltage is **< 108 VDC** on unit 125 VDC battery buses 111(211) and 112(212).

AND

4. **ALL** AC and Vital DC power sources have been lost for **≥ 15 minutes**.

~~1. a. Loss of **ALL** offsite and **ALL** onsite AC power to (site-specific emergency buses) for 15 minutes or longer.~~

AND

~~b. Indicated voltage is less than (site-specific bus voltage value) on **ALL** (site-specific Vital DC bussesbuses) for 15 minutes or longer.~~

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

This IC addresses a concurrent and prolonged loss of both AC and Vital DC power. A loss of all AC power compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. A loss of Vital DC power compromises the ability to monitor and control SAFETY SYSTEMS. A sustained loss of both AC and DC power will lead to multiple challenges to fission product barriers.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses. The 15-minute emergency declaration clock begins at the point when **both-all EAL conditions thresholds** are met.

Basis Reference(s):

1. NEI 99-01 Rev 6, SG8
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2 BOA ELEC-3 Loss Of 4KV ESF Bus Unit 1/2
5. 1/2 BOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2 BCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2 BCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2 BCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2 BCA-0.3 Response To Opposite Unit Loss Of All AC Power Unit 1/2
10. BOP AP-51, Isolating Unit 1 System AUX Transformer 142-1 & 142-2 While Unit Is At Power
11. BOP AP-52, Restoring Unit 1 System AUX Transformer 142-1 & 142-2 During Power Operation
12. BOP AP-53, Isolating Unit 2 System AUX Transformer 242-1 & 242-2 While Unit Is At Power
13. BOP AP-54, Restoring Unit 2 System AUX Transformer 242-1 & 242-2 During Power Operation
14. Safety Evaluations of the Byron Station and Byron Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)
15. UFSAR 8.3.2.1.1
16. 6E-0-4001 Station One Line Diagram
17. BAR 1/2-21-E10 125V DC PNL 111/113 (211/213) VOLT LOW
18. BAR 1/2-22-E10 125V DC PNL 112/114 (212/214) VOLT LOW
19. 1/2 BOA ELEC - 1 Loss of DC Bus Unit 1/2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

MSS28**Initiating Condition:**

Loss of all vital DC power for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. ~~The Emergency Director should declare the Site Area Emergency promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.~~

~~Indicated voltage is < 108 VDC less than (site-specific bus voltage value) on unit 125 VDC battery buses 111(211) and 112(212) ALL (site-specific Vital DC bussesbuses) for ≥15 minutes or longer.~~

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a loss of Vital DC power which compromises the ability to monitor and control SAFETY SYSTEMS. In modes above Cold Shutdown, this condition involves a major failure of plant functions needed for the protection of the public.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via ICs RAG1, FG1 or MSG38.

Basis Reference(s):

1. NEI 99-01 Rev 6, SS8
2. UFSAR 8.3.2.1.1
3. 6E-0-4001 Station One Line Diagram
4. BAR 1/2-21-E10 125V DC PNL 111/113 (211/213) VOLT LOW
5. BAR 1/2-22-E10 125V DC PNL 112/114 (212/214) VOLT LOW
6. 1/2 BOA ELEC - 1 Loss of DC Bus Unit 1/2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MSS35****Initiating Condition:**

Inability to shutdown the reactor causing a challenge to core cooling or RCS heat removal.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):

1. Automatic or Manual Trip did **not** shutdown the reactor **as indicated by Reactor Power \geq 5%.**

AND

2. **ALL** manual actions to shutdown the reactor have been unsuccessful **as indicated by Reactor Power \geq 5%.**

AND

3. EITHER of the following conditions exist:

- a. **Core Cooling CSF-RED Path** conditions exist. ~~(Site-specific indication of an inability to adequately remove heat from the core)~~

OR

- b. **Heat Sink CSF-RED Path** conditions exist. ~~(Site-specific indication of an inability to adequately remove heat from the RCS)~~

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, **all subsequent operator manual actions, both inside and outside the Control Room including driving in control rods and boron injection, all subsequent operator actions to manually shutdown the reactor** are unsuccessful, and continued power generation is challenging the capability to adequately remove heat from the core and/or the RCS. This condition will lead to fuel damage if additional mitigation actions are unsuccessful and thus warrants the declaration of a Site Area Emergency.

If Core Cooling CSF Red Path or Heat Sink CSF Red Path conditions exist prior to a successful reactor shutdown (i.e. < 5% reactor power) then entry is required.

The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

all S/Gs is less than or equal to 500 gpm. If total feed flow is less than 500 gpm due to procedurally directed operator actions then this condition does not apply.

In some instances, the emergency classification resulting from this IC/EAL may be higher than that resulting from an assessment of the plant responses and symptoms against the Recognition Category F ICs/EALs. This is appropriate in that the Recognition Category F ICs/EALs do not address the additional threat posed by a failure to shutdown the reactor. The inclusion of this IC and EAL ensures the timely declaration of a Site Area Emergency in response to prolonged failure to shutdown the reactor.

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Escalation of the emergency classification level would be via IC RAG1 or FG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SS5
2. 1/2 BST-1 Subcriticality Unit 1/2
3. 1/2 BST-2 Core Cooling Unit 1/2
4. 1/2 BST-3 Heat Sink Unit 1/2
5. 1/2 BFR-S.1 Response to Nuclear Power Generation/ATWS Unit 1/2
6. 1/2 BFR H.1 Response to Loss of Secondary Heat Sink Unit 1/2
7. 1/2 BFR C.1 Response to Inadequate Core Cooling Unit 1/2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MSA35****Initiating Condition:**

Automatic or manual trip fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):

Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.

1. ~~An~~ Automatic or manual ~~T~~trip did **not** shutdown the reactor **as indicated by Reactor Power \geq 5%**.

AND

2. Manual actions taken at the ~~reactor control consoles~~ **Main Control Board** are **not** successful in shutting down the reactor **as indicated by Reactor Power \geq 5%**.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, and subsequent operator manual actions taken at the reactor control consoles to shutdown the reactor are also unsuccessful. This condition represents an actual or potential substantial degradation of the level of safety of the plant. An emergency declaration is required even if the reactor is subsequently shutdown by an action taken away from the reactor control consoles since this event entails a significant failure of the RPS.

A manual action at the **Main Control Board** ~~reactor control consoles~~ is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core (e.g., initiating a manual reactor trip. This action does not include manually driving in control rods or implementation of boron injection strategies. If this action(s) is unsuccessful, operators would immediately pursue additional manual actions at locations away from the reactor control consoles (e.g., locally opening breakers). Actions taken at back-panels or other locations within the Control Room, or any location outside the Control Room, are not considered to be "at the ~~reactor control consoles~~ **Main Control Board**".

The plant response to the failure of an automatic or manual reactor trip will vary based upon several factors including the reactor power level prior to the event, availability of the condenser, performance of mitigation equipment and actions, other concurrent plant conditions, etc. If the failure to shutdown the reactor is prolonged enough to cause a challenge to the core cooling or RCS heat removal safety functions, the emergency

**RECOGNITION CATEGORY
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classification level will escalate to a Site Area Emergency via IC **MSS35**. Depending upon plant responses and symptoms, escalation is also possible via IC FS1. Absent

the plant conditions needed to meet either IC **MSS35** or FS1, an Alert declaration is appropriate for this event.

It is recognized that plant responses or symptoms may also require an Alert declaration in accordance with the Recognition Category F ICs; however, this IC and EAL are included to ensure a timely emergency declaration.

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA5
2. 1/2 BST-1 Subcriticality Unit 1/2
3. 1/2 BFR-S.1 Response to Nuclear Power Generation/ATWS Unit 1/2
4. 1/2 BOSR 0.1-1,2,3 Unit One(Two) Mode 1, 2, & 3 Shiftly and Daily Operating Surveillance

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SYSTEM MALFUNCTIONS

MSU35

Initiating Condition:

Automatic or manual trip fails to shutdown the reactor.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):

Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.

1. a. ~~An~~Automatic ~~T~~trip did not shutdown the reactor as indicated by Reactor Power \geq 5%.

AND

- b. ~~A~~Subsequent manual action taken at the ~~reactor control consoles~~Main Control Board is successful in shutting down the reactor.

OR

2. a. ~~A~~Manual ~~T~~trip did not shutdown the reactor as indicated by Reactor Power \geq 5%.

AND

- b. EITHER of the following:

1. ~~A~~Subsequent manual action taken at the ~~reactor control consoles~~Main Control Board is successful in shutting down the reactor.

OR

2. ~~A~~Subsequent ~~automatic~~Automatic ~~T~~trip is successful in shutting down the reactor.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, and either a subsequent operator manual action taken at the reactor control consoles or an automatic trip is successful in shutting

RECOGNITION CATEGORY SYSTEM MALFUNCTIONS

down the reactor. This event is a precursor to a more significant condition and thus represents a potential degradation of the level of safety of the plant.

EAL #1 Basis

Following the failure on an automatic reactor trip, operators will promptly initiate manual actions at the reactor control consoles to shutdown the reactor (e.g., initiate a manual reactor trip). If these manual actions are successful in shutting down the reactor, core heat generation will quickly fall to a level within the capabilities of the plant's decay heat removal systems.

EAL #2 Basis

If an initial manual reactor trip is unsuccessful, operators will promptly take manual action at another location(s) on the ~~Main Control Boardreactor control consoles~~ to shutdown the reactor (e.g., initiate a manual reactor trip using a different switch). Depending upon several factors, the initial or subsequent effort to manually trip the reactor, or a concurrent plant condition, may lead to the generation of an automatic reactor trip signal. If a subsequent manual or automatic trip is successful in shutting down the reactor, core heat generation will quickly fall to a level within the capabilities of the plant's decay heat removal systems.

A manual action at the ~~Main Control Boardreactor control consoles~~ is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core (e.g., initiating a manual reactor trip). This action does not include manually driving in control rods or implementation of boron injection strategies. Actions taken at back-panels or other locations within the Control Room, or any location outside the Control Room, are not considered to be "at the ~~Main Control Boardreactor control consoles~~".

The plant response to the failure of an automatic or manual reactor trip will vary based upon several factors including the reactor power level prior to the event, availability of the condenser, performance of mitigation equipment and actions, other concurrent plant conditions, etc. If subsequent operator manual actions taken at the ~~Main Control Boardreactor control consoles~~ are also unsuccessful in shutting down the reactor, then the emergency classification level will escalate to an Alert via IC **MSA35**. Depending upon the plant response, escalation is also possible via IC FA1. Absent the plant conditions needed to meet either IC **MSA35** or FA1, an Unusual Event declaration is appropriate for this event.

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Should a reactor trip signal be generated as a result of plant work (e.g., RPS setpoint testing), the following classification guidance should be applied.

- If the signal **generated as a result of plant work** causes a plant transient **that creates a real condition** that should have included an automatic reactor trip and the RPS fails to automatically shutdown the reactor, then this IC and the EALs are applicable, and should be evaluated.

**RECOGNITION CATEGORY
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- If the signal **generated as a result of plant work** does not cause a plant transient **but should have generated an RPS trip signal** and the trip failure is determined through other means (e.g., assessment of test results), then this IC and the EALs are not applicable and no classification is warranted.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU5
2. 1/2 BST-1 Subcriticality Unit 1/2
3. 1/2 BFR-S.1 Response to Nuclear Power Generation/ATWS Unit 1/2

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MSA42

Initiating Condition:

UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. ~~The Emergency Director should declare the Alert promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.~~

1. a. ~~An UNPLANNED event results in the inability to monitor one or more ANY Table M1 of the following~~ parameters from within the Control Room for ≥15 minutes or longer.

[see table below]

[PWR parameter list]
Reactor Power
RCS Level
RCS Pressure
In-Core/Core Exit Temperature
Levels in at least (site-specific number) steam generators
Steam Generator Auxiliary or Emergency Feed Water Flow

Table M1 – Control Room Parameters
<ul style="list-style-type: none"> • Reactor Power • PZR Level • RCS Pressure • In Core/Core Exit Temperature • Narrow Range level in at least one Steam Generator • Steam generator Auxiliary Feed Water Flow

AND

- b. Any ~~Table M2 of the following~~ transient **events** in progress.

- ~~• Automatic or Manual runback greater than 25% thermal reactor power~~
- ~~• Electrical load rejection greater than 25% full electrical load~~
- ~~• Reactor trip~~
- ~~• ECGS (SI) actuation~~

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****Table M2 – Significant Transients**

- Automatic Turbine Runback >25% thermal reactor power
- Electrical Load Rejection >25% full electrical load
- Reactor Trip
- Safety Injection Actuation

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses the difficulty associated with monitoring rapidly changing plant conditions during a transient without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. During this condition, the margin to a potential fission product barrier challenge is reduced. It thus represents a potential substantial degradation in the level of safety of the plant.

As used in this EAL, an “inability to monitor” means that values for ~~one or more~~any of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, **computer point**, digital and recorder source within the Control Room.

An event involving a loss of plant indications, annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine ~~one or more~~any of these parameters from within the Control

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SYSTEM MALFUNCTIONS**

Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for ~~one or more~~ any of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from the indications and recorders on a main control board, the SPDS or the plant computer, the availability of other parameter values may be compromised as well.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation of the emergency classification level would be via ICs FS1 or IC RAS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA2

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SYSTEM MALFUNCTIONS**

MSU42

Initiating Condition:

UNPLANNED loss of Control Room indications for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. ~~The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.~~

a. ~~An~~ UNPLANNED event results in the inability to monitor ~~one or more~~ **ANY** Table M1 parameters from within the Control Room for **≥ 15 minutes**.

Table M1 – Control Room Parameters
<ul style="list-style-type: none"> • Reactor Power • PZR Level • RCS Pressure • In Core/Core Exit Temperature • Narrow Range level in at least one Steam Generator • Steam generator Auxiliary Feed Water Flow

~~1. of the following parameters from within the Control Room for 15 minutes or longer.~~

2. {BWR parameter list}	3. {PWR parameter list}
4. Reactor Power	6. Reactor Power
5.	7.
8. RPV Water Level	9. RCS Level
10. RPV Pressure	11. RCS Pressure
12. Primary Containment Pressure	13. In-Core/Core Exit Temperature
14. Suppression Pool Level	15. Levels in at least (site-specific number) steam generators
16. Suppression Pool Temperature	17. Steam Generator Auxiliary or Emergency Feed Water Flow

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****Basis:**

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses the difficulty associated with monitoring normal plant conditions without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. This condition is a precursor to a more significant event and represents a potential degradation in the level of safety of the plant.

As used in this EAL, an "inability to monitor" means that values for ~~one or more~~any of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, digital and recorder source within the Control Room.

An event involving a loss of plant indications, annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine ~~one or more~~any of these parameters from within the Control Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for ~~one or more~~any of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from the indications and recorders on a main control board, the SPDS or the plant computer, the availability of other parameter values may be compromised as well.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation of the emergency classification level would be via IC **MSA42**.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU2