

# **ATTACHMENT 9**

**DISCUSSION OF REVISION  
TO THE  
REVISED RADIOLOGICAL EMERGENCY PLAN  
ANNEX INFORMATION  
FOR  
PEACH BOTTOM ATOMIC POWER STATION**

EP-AA-1007

## **Enclosures**

- Enclosure 9A – Revised EAL Comparison Matrix Document
- Enclosure 9B – Revised EAL Red-Line Basis Documents
- Enclosure 9C – Revised EAL Basis Documents

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification								
<p align="center"><b>AG1</b></p> <p><b>Initiating Condition – GENERAL EMERGENCY</b> Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mRem TEDE or 5,000 mRem thyroid CDE.</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.</li> <li>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monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.</li> <li>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.</li> </ul> <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 <b>EITHER</b> of the following at or beyond (site-specific dose receptor point):</p> <ul style="list-style-type: none"> <li>Closed window dose rates greater than 1000 mR/hr expected to continue for 60 minutes or longer.</li> <li>Analysis of field survey samples indicate thyroid CDE greater than 5000 mRem for one hour of inhalation.</li> </ul>	<p align="center"><b>RG1</b></p> <p><b>Initiating Condition:</b> Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mRem TEDE or 5,000 mRem thyroid CDE.</p> <p><b>Operating Mode Applicability:</b> 1,2,3,4,5,D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.</li> <li>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.</li> <li>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.</li> </ul> <p>1. Readings on <b>ANY</b> Table R1 Effluent Monitor &gt; <b>Table R1 value</b> for <b>≥ 15 minutes.</b> <b>OR</b></p> <p>2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of <b>EITHER:</b></p> <ul style="list-style-type: none"> <li><b>a. &gt; 1000 mRem TEDE</b> <b>OR</b></li> <li><b>b. &gt; 5000 mRem CDE Thyroid</b></li> </ul> <p><b>OR</b></p> <p>3. Field survey results at or beyond the site boundary indicate <b>EITHER:</b></p> <ul style="list-style-type: none"> <li>a. Gamma (closed window) dose rates &gt;1000 mR/hr are expected to continue for <b>≥ 60 minutes.</b> <b>OR</b></li> <li>b. Analyses of field survey samples indicate <b>&gt; 5000 mRem CDE Thyroid</b> for <b>60 minutes</b> of inhalation.</li> </ul> <table border="1" data-bbox="745 1143 1344 1268"> <thead> <tr> <th colspan="2">Table R1 Effluent Monitor Thresholds</th> </tr> <tr> <th>Release Path</th> <th>General Emergency</th> </tr> </thead> <tbody> <tr> <td>Main Stack (RI-0-17-050B Common)</td> <td>5.57 E+09 uCi/sec</td> </tr> <tr> <td>Vent Stack (RI-2979B Unit 2 or RI-397/B Unit 3)</td> <td>1.60 E+08 uCi/sec</td> </tr> </tbody> </table>	Table R1 Effluent Monitor Thresholds		Release Path	General Emergency	Main Stack (RI-0-17-050B Common)	5.57 E+09 uCi/sec	Vent Stack (RI-2979B Unit 2 or RI-397/B Unit 3)	1.60 E+08 uCi/sec	<p 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>
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**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification								
<p align="center"><b>AS1</b></p> <p><b>Initiating Condition – SITE AREA EMERGENCY</b></p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 100 mRem TEDE or 500 mRem thyroid CDE.</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the Site Area Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.</li> <li>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.</li> <li>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.</li> </ul> <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 <b>EITHER</b> of the following at or beyond (site-specific dose receptor point):</p> <ul style="list-style-type: none"> <li>Closed window dose rates greater than 100 mR/hr expected to continue for 60 minutes or longer.</li> <li>Analysis of field survey samples indicate thyroid CDE greater than 500 mRem for one hour of inhalation.</li> </ul>	<p align="center"><b>RS1</b></p> <p><b>Initiating Condition:</b></p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 100 mRem TEDE or 500 mRem thyroid CDE.</p> <p><b>Operating Mode Applicability:</b></p> <p>1,2,3,4,5,D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.</li> <li>Classification based on effluent monitor readings assumes that a release path to the environment is established. 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Analyses of field survey samples indicate &gt; 500 mRem CDE Thyroid for 60 minutes of inhalation.</p> <table border="1" data-bbox="743 1133 1344 1257"> <thead> <tr> <th colspan="2">Table R1 Effluent Monitor Thresholds</th> </tr> <tr> <th>Release Path</th> <th>Site Area Emergency</th> </tr> </thead> <tbody> <tr> <td>Main Stack (RI-0-17-050/B Common)</td> <td>5.57 E+08 uCi/sec</td> </tr> <tr> <td>Vent Stack (RI-2979B Unit 2 or RI-397/B Unit 3)</td> <td>1.60 E+07 uCi/sec</td> </tr> </tbody> </table>	Table R1 Effluent Monitor Thresholds		Release Path	Site Area Emergency	Main Stack (RI-0-17-050/B Common)	5.57 E+08 uCi/sec	Vent Stack (RI-2979B Unit 2 or RI-397/B Unit 3)	1.60 E+07 uCi/sec	<p 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>
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<p align="center"><b>AA1</b></p> <p><b>Initiating Condition – ALERT</b></p> <p>Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mRem TEDE or 50 mRem thyroid CDE.</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <p>Note:</p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the Alert promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.</li> <li>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.</li> <li>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.</li> </ul> <p>1. Reading on any of the following radiation monitors greater than the reading shown for 15 minutes or longer:</p> <p align="center">(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 <b>EITHER</b> of the following at or beyond (site-specific dose receptor point):</p> <ul style="list-style-type: none"> <li>Closed window dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer.</li> <li>Analysis of field survey samples indicate thyroid CDE greater than 50 mRem for one hour of inhalation.</li> </ul>	<p align="center"><b>RA1</b></p> <p><b>Initiating Condition:</b></p> <p>Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mRem TEDE or 50 mRem thyroid CDE.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.</li> <li>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.</li> <li>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.</li> </ul> <p>1. Readings on <b>ANY</b> Table R1 Effluent Monitor &gt; <b>Table R1 value for ≥ 15 minutes.</b></p> <p><b>OR</b></p> <p>2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of <b>EITHER:</b></p> <p>a. &gt; 10 mRem TEDE</p> <p><b>OR</b></p> <p>b. &gt; 50 mRem CDE Thyroid</p> <p><b>OR</b></p> <p>3. Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than <b>EITHER</b> of the following at or beyond the site boundary</p> <p>a. 10 mRem TEDE for 60 minutes of exposure</p> <p><b>OR</b></p> <p>b. 50 mRem CDE Thyroid for 60 minutes of exposure</p> <p><b>OR</b></p> <p>4. Field survey results at or beyond the site boundary indicate <b>EITHER:</b></p> <p>a. Gamma (closed window) dose rates &gt; 10 mR/hr are expected to continue for ≥ 60 minutes.</p> <p><b>OR</b></p> <p>b. Analyses of field survey samples indicate &gt; 50 mRem CDE Thyroid for 60 minutes of inhalation.</p> <table border="1" data-bbox="743 1224 1350 1348"> <thead> <tr> <th colspan="2">Table R1 Effluent Monitor Thresholds</th> </tr> <tr> <th>Release Path</th> <th>Alert</th> </tr> </thead> <tbody> <tr> <td>Main Stack (RI-0-17-050B Common)</td> <td>5.57 E+07 uCi/sec</td> </tr> <tr> <td>Vent Stack (RI-2979B Unit 2 or RI-3979B Unit 3)</td> <td>1.60 E+06 uCi/sec</td> </tr> </tbody> </table>	Table R1 Effluent Monitor Thresholds		Release Path	Alert	Main Stack (RI-0-17-050B Common)	5.57 E+07 uCi/sec	Vent Stack (RI-2979B Unit 2 or RI-3979B Unit 3)	1.60 E+06 uCi/sec	<p 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) A calculation was 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 via the normal site release pathway. The liquid release would contain activity equivalent to provide 10mrem TEDE or 50mrem thyroid CDE at the site boundary. The calculation determined the effluent monitor response would be &gt;110% of the instrument maximum range and as such, IAW NEI 99-01 Rev 6 guidance, was not included in this EAL.</p>
Table R1 Effluent Monitor Thresholds										
Release Path	Alert									
Main Stack (RI-0-17-050B Common)	5.57 E+07 uCi/sec									
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<p align="right"><b>AU1</b></p> <p><b>Initiating Condition – UNUSUAL EVENT</b></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><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the Unusual Event promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes.</li> <li>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.</li> </ul> <ol style="list-style-type: none"> <li>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)</li> <li>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.</li> <li>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.</li> </ol>	<p align="right"><b>RU1</b></p> <p><b>Initiating Condition:</b></p> <p>Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes.</li> <li>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.</li> </ul> <ol style="list-style-type: none"> <li>Reading on ANY of the following effluent monitors &gt; 2 times alarm setpoint established by a current radioactive release discharge permit for ≥ 60 minutes. <ul style="list-style-type: none"> <li>Radwaste Discharge Effluent Monitor (RI-0-17-350)</li> <li>OR</li> <li>Discharge Permit specified monitor</li> </ul> </li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>Readings on ANY Table R1 Effluent Monitor &gt; Table R1 value for ≥ 60 minutes:</li> </ol> <table border="1" data-bbox="751 905 1360 1141"> <thead> <tr> <th colspan="2">Table R1 Effluent Monitor Thresholds</th> </tr> <tr> <th>Release Path</th> <th>Unusual Event</th> </tr> </thead> <tbody> <tr> <td><b>Main Stack</b> (RI-0-17-050B Common)</td> <td>6.36 E+05 uCi/sec</td> </tr> <tr> <td><b>Main Stack</b> (RI-0-17-050A Common)</td> <td>6.36 E+05 uCi/sec</td> </tr> <tr> <td><b>Vent Stack</b> (RI-2979B Unit 2 or RI-3979B Unit 3)</td> <td>1.82 E+04 uCi/sec</td> </tr> <tr> <td><b>Vent Stack</b> (RI-2979A Unit 2 or RI-3979A Unit 3)</td> <td>1.82 E+04 uCi/sec</td> </tr> </tbody> </table> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates &gt; 2 times ODCM Limit with a release duration of ≥ 60 minutes.</li> </ol>	Table R1 Effluent Monitor Thresholds		Release Path	Unusual Event	<b>Main Stack</b> (RI-0-17-050B Common)	6.36 E+05 uCi/sec	<b>Main Stack</b> (RI-0-17-050A Common)	6.36 E+05 uCi/sec	<b>Vent Stack</b> (RI-2979B Unit 2 or RI-3979B Unit 3)	1.82 E+04 uCi/sec	<b>Vent Stack</b> (RI-2979A Unit 2 or RI-3979A Unit 3)	1.82 E+04 uCi/sec	<p 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>
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<p align="right"><b>AG2</b></p> <p><b>Initiating Condition -- GENERAL EMERGENCY</b></p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer .</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>NOTES:</b> 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 align="right"><b>RG2</b></p> <p><b>Initiating Condition:</b></p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> 1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b> The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for <b>60 minutes</b> or longer.</p>	<p align="center"> <input type="checkbox"/> No Change                     <input checked="" type="checkbox"/> Difference                     <input type="checkbox"/> Deviation             </p> <p>1) EAL will be 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>

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<p align="right"><b>AS2</b></p> <p><b>Initiating Condition – SITE AREA EMERGENCY</b></p> <p>Spent fuel pool level at (site-specific Level 3 description)</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b></p> <p>1. Lowering of spent fuel pool level to (site-specific Level 3 value).</p>	<p align="right"><b>RS2</b></p> <p><b>Initiating Condition:</b></p> <p>Spent fuel pool level at (site-specific Level 3 description).</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p>Lowering of spent fuel pool level to (site-specific Level 3 value).</p>	<p align="center"> <input type="checkbox"/> No Change                     <input checked="" type="checkbox"/> Difference                     <input type="checkbox"/> Deviation             </p> <p>1) EAL will be 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>AA2</b></p> <p><b>Initiating Condition – ALERT</b></p> <p>Significant lowering of water level above, or damage to, irradiated fuel.</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <ol style="list-style-type: none"> <li>1. Uncovery of irradiated fuel in the REFUELING PATHWAY.</li> <li>2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by <b>ANY</b> of the following radiation monitors:  (site-specific listing of radiation monitors, and the associated readings, setpoints and/or alarms)</li> <li>3. Lowering of spent fuel pool level to (site-specific Level 2 value).</li> </ol>	<p align="right"><b>RA2</b></p> <p><b>Initiating Condition:</b></p> <p>Significant lowering of water level above, or damage to, irradiated fuel.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <ol style="list-style-type: none"> <li>1. Uncovery of irradiated fuel in the REFUELING PATHWAY.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by <b>ANY</b> Table R2 Radiation Monitor reading <b>&gt;1000 mRem/hr.</b></li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>3. Lowering of spent fuel pool level to (site-specific Level 2 value).</li> </ol> <div data-bbox="793 683 1323 921" style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p align="center"><b>Table R2 Refuel Floor ARM's</b></p> <ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul> </div>	<p 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 will be 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>AU2</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b> UNPLANNED loss of water level above irradiated fuel <b>Operating Mode Applicability: All</b></p> <p><b>Example Emergency Action Levels:</b></p> <p>1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following:  (site-specific level indications).</p> <p><b>AND</b></p> <p>b. UNPLANNED rise in area radiation levels as indicated by ANY of the following radiation monitors.  (site-specific list of area radiation monitors)</p>	<p align="right"><b>RU2</b></p> <p><b>Initiating Condition:</b> UNPLANNED loss of water level above irradiated fuel <b>Operating Mode Applicability:</b> 1, 2, 3, 4, 5, D <b>Emergency Action Level (EAL):</b></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"> <li>• Refueling Cavity water level &lt; 458 inches on Shutdown/Refuel Range indicator LI-2(3)-2-3-86 or PR/FR-2(3)-06-097.</li> <li><b>OR</b></li> <li>• Spent Fuel Pool level &lt; 232 feet 3 inches plant elevation.</li> <li><b>OR</b></li> <li>• Indication or report of a drop in water level in the REFUELING PATHWAY.</li> </ul> <p><b>AND</b></p> <p>b. UNPLANNED Area Radiation Monitor reading rise on ANY radiation monitors in Table R2.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p align="center"><b>Table R2 Refuel Floor ARM's</b></p> <ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul> </div>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification												
<p align="right"><b>AA3</b></p> <p><b>Initiating Condition – ALERT</b></p> <p>Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels:</b> (1 or 2)</p> <p><b>Note:</b> 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"> <li>Dose rate greater than 15 mR/hr in <b>ANY</b> of the following areas: <ul style="list-style-type: none"> <li>Control Room</li> <li>Central Alarm Station</li> <li>(other site-specific areas/rooms)</li> </ul> </li> <li>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)</li> </ol>	<p align="right"><b>RA3</b></p> <p><b>Initiating Condition:</b></p> <p>Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5,D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <ol style="list-style-type: none"> <li>Dose rate &gt; 15 mR/hr in <b>ANY</b> of the following Table R3 areas: <table border="1" data-bbox="825 674 1289 797"> <thead> <tr> <th align="center" colspan="2">Table R3 Areas Requiring Continuous Occupancy</th> </tr> </thead> <tbody> <tr> <td colspan="2"> <ul style="list-style-type: none"> <li>Main Control Room</li> <li>Central Alarm Station – (by survey)</li> </ul> </td> </tr> </tbody> </table> </li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>UNPLANNED event results in radiation levels that prohibit or significantly impede access to <b>ANY</b> of the following Table R4 plant rooms or areas: <table border="1" data-bbox="848 888 1266 1049"> <thead> <tr> <th align="center" colspan="2">Table R4 Areas with Entry Related Mode Applicability</th> </tr> <tr> <th align="center">Area of concern</th> <th align="center">Entry Related Mode Applicability</th> </tr> </thead> <tbody> <tr> <td align="center"><b>Reactor Building</b></td> <td align="center">Modes 3, 4 and 5</td> </tr> <tr> <td align="center">135' all areas</td> <td></td> </tr> </tbody> </table> </li> </ol>	Table R3 Areas Requiring Continuous Occupancy		<ul style="list-style-type: none"> <li>Main Control Room</li> <li>Central Alarm Station – (by survey)</li> </ul>		Table R4 Areas with Entry Related Mode Applicability		Area of concern	Entry Related Mode Applicability	<b>Reactor Building</b>	Modes 3, 4 and 5	135' all areas		<p align="center"><b>Justification</b></p> <p><input checked="" type="checkbox"/> No Change    <input type="checkbox"/> Difference    <input type="checkbox"/> Deviation</p> <p>1) Listed site-specific plant rooms and areas with identified mode applicability to ensure timely classification.</p>
Table R3 Areas Requiring Continuous Occupancy														
<ul style="list-style-type: none"> <li>Main Control Room</li> <li>Central Alarm Station – (by survey)</li> </ul>														
Table R4 Areas with Entry Related Mode Applicability														
Area of concern	Entry Related Mode Applicability													
<b>Reactor Building</b>	Modes 3, 4 and 5													
135' all areas														

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SU3</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b>                      Reactor coolant activity greater than Technical Specification allowable limits.  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Example Emergency Action Levels:</b></p> <ol style="list-style-type: none"> <li>(Site-specific radiation monitor) reading greater than (site-specific value).</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>Sample analysis indicates that a reactor coolant activity value is greater than an allowable limit specified in Technical Specifications.</li> </ol>	<p align="right"><b>RU3</b></p> <p><b>Initiating Condition:</b>                      Reactor coolant activity greater than Technical Specification allowable limits.  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Emergency Action Level (EAL):</b></p> <ol style="list-style-type: none"> <li>Air Ejector discharge radiation monitor RIS-2(3)-17-150 A/B HI-HI alarm.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>Specific coolant activity &gt; 4.0 uCi/gm Dose equivalent I-131.</li> </ol>	<p align="center"> <input type="checkbox"/> No Change                        <input checked="" type="checkbox"/> Difference                        <input type="checkbox"/> Deviation                 </p> <p>1) Listed site-specific monitor and Threshold value to ensure timely classification.</p> <p>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.</p>

**EAL Comparison Matrix Document**

NEI 99-01 rev 6 Fission Product Barrier Matrix

Fission Product Barrier Matrix		Hot Matrix						
GENERAL EMERGENCY			SITE AREA EMERGENCY		ALERT			
<b>FG1</b>	Loss of any two barriers AND Loss or Potential Loss of third barrier.	1,2,3	<b>FS1</b>	Loss or Potential Loss of ANY two barriers.	1,2,3	<b>FA1</b>	ANY Loss or ANY Potential Loss of either Fuel Clad or RCS	1,2,3
Sub-Category	FC – Fuel Clad		RC – Reactor Coolant System		CT - Containment			
	Loss	Potential Loss	Loss	Potential Loss	Loss	Potential Loss		
1. RCS Activity / Primary Containment Pressure / Primary Containment Conditions	A. (Site-specific indications that reactor coolant activity is greater than 300 uCi/gm dose equivalent I-131)	None	A. Primary containment pressure greater than (site-specific value) due to RCS leakage.	None	A. UNPLANNED rapid drop in primary containment pressure following primary containment pressure rise OR B. Primary containment pressure response not consistent with LOCA conditions.	A. Primary containment pressure greater than (site-specific value) OR B. (site-specific explosive mixture) exists inside primary containment OR C. HCTL exceeded.		
2. RPV Water Level	A. Primary containment flooding required.	A. RPV water level cannot be restored and maintained above (site-specific RPV water level corresponding to top of active fuel) or cannot be determined.	A. RPV water level cannot be restored and maintained above (site-specific RPV water level corresponding to the top of active fuel) or cannot be determined.	None	None	A. Primary containment flooding required.		
3. RCS Leak Rate/ Primary Containment Isolation Failure	None	None	A. UNISOLABLE break in any of the following: ( site-specific systems with potential for high-energy line breaks) OR B. Emergency RPV Depressurization	A. UNISOLABLE primary system leakage that results in exceeding EITHER of the following: 1. Max Normal Operating Temperature OR 2. Max Normal Operating Area Radiation Level.	A. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal OR B. Intentional primary containment venting per EOPs OR C. UNISOLABLE primary system leakage that results in exceeding EITHER of the following: 1. Max Safe Operating Temperature. OR 2. Max Safe Operating Area Radiation Level.	None		
4. Primary Containment Radiation	A. Primary Containment Radiation Monitor reading greater than (site-specific value).	None	A. Primary Containment Radiation Monitor reading greater than (site-specific value).	None	None	A. Primary Containment Radiation Monitor reading greater than (site-specific value).		
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.		

EAL Comparison Matrix Document

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			FS1 Loss or Potential Loss of ANY two barriers. 1 2 3			FA1 ANY Loss or ANY Potential Loss of either Fuel Clad or RCS 1 2 3	
Sub-Category	FC – Fuel Clad		RC – Reactor Coolant System		CT - Containment		
	Loss	Potential Loss	Loss	Potential Loss	Loss	Potential Loss	
1. RCS Activity	Coolant activity > 300 uCi/gm Dose Equivalent I-131.	None	None	None	None	None	
2. RPV Water Level	1. Plant conditions indicate Primary Containment flooding is required.	2. RPV water level <u>cannot</u> be restored and maintained > -172 inches (TAF) OR 3. RPV water level <u>cannot</u> be determined.	1. RPV water level <u>cannot</u> be restored and maintained > -172 inches (TAF) OR 2. RPV water level <u>cannot</u> be determined.	None	None	Plant conditions indicate Primary Containment flooding is required.	
3. Primary Containment Pressure/Conditions	None	None	1. Drywell pressure >2.0 psig. AND 2. Drywell pressure rise is due to RCS leakage	None	1. UNPLANNED rapid drop in Drywell pressure following primary containment pressure rise. OR 2. Drywell pressure response <u>not</u> consistent with LOCA conditions.	3. Primary Containment pressure > 56 psig. OR 4. a. Drywell or torus hydrogen concentration > 6%. AND b. Drywell or torus oxygen concentration > 5%. OR 5. Heat Capacity Limit (T-102 Curve T/T-1) exceeded.	
4. RCS Leak Rate	None	None	1. UNISOLABLE Main Steam Line (MSL), HPCI, Feedwater, RWCU or RCIC line break. OR 2. Emergency RPV Depressurization is required.	3. UNISOLABLE primary system leakage that results in EITHER of the following: a. Secondary Containment area temperature > T-103 Alarm Setpoint. OR b. Secondary Containment area radiation level > T-103 Alarm Setpoint.	None	None	
5. Primary Containment Radiation	Drywell radiation monitor reading > 9.55 E+02 R/hr.	None	Drywell radiation monitor reading > 100R/hr.	None	None	Drywell radiation monitor reading > 2.20 E+03 R/hr	
6. Primary Containment Isolation Failure	None	None	None	None	1. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal. OR 2. Intentional Primary Containment venting/purging per EOPs or SAMPs due to accident conditions. OR 3. UNISOLABLE primary system leakage that results in EITHER of the following: a. Secondary Containment area temperature > T-103 Action Level. OR b. Secondary Containment area radiation level > T-103 Action Level.	None	
7. Emergency Director Judgment	Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	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.	

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>FC1</b></p> <p><b>Category: Fuel Clad Barrier</b>                      RCS Activity  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. (Site-specific indications that reactor coolant activity is greater than 300 uCi/gm dose equivalent I-131)</p>	<p align="right"><b>FC1</b></p> <p><b>Category: Fuel Clad Barrier</b>                      RCS Activity  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      Coolant activity &gt; 300 uCi/gm Dose Equivalent I-131.</p>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>FC2</b></p> <p><b>Category: Fuel Clad Barrier</b>                      RPV Water Level  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. Primary containment flooding required.                      Potential Loss                      A. RPV water level cannot be restored and maintained above (site-specific RPV water level corresponding to top of active fuel) or cannot be determined.</p>	<p align="right"><b>FC2</b></p> <p><b>Category: Fuel Clad Barrier</b>                      RCS Activity  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      1. Plant conditions indicate Primary Containment flooding is required.  <u>Potential Loss</u>                      2. RPV water level <u>cannot</u> be restored and maintained &gt; -172 inches (TAF)  <b>OR</b>                      3. RPV water level <u>cannot</u> be determined.</p>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>FC4</b></p> <p><b>Category: Fuel Clad Barrier</b>                      Primary Containment Radiation  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. Primary Containment Radiation Monitor reading greater than (site-specific value).</p>	<p align="right"><b>FC5</b></p> <p><b>Category: Fuel Clad Barrier</b>                      Primary Containment Radiation  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      Drywell radiation monitor reading &gt; 9.55 E+02 R/hr.</p>	<p> <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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>FC6</b></p> <p><b>Category: Fuel Clad Barrier</b> Emergency Director Judgment <b>Operating Mode Applicability:</b> Power Operation, Startup, Hot Standby, Hot Shutdown <b>Fission Product Barrier Threshold:</b> <u>Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier. <u>Potential Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.</p>	<p align="right"><b>FC7</b></p> <p><b>Category: Fuel Clad Barrier</b> Emergency Director Judgment <b>Operating Mode Applicability:</b> 1, 2, 3 <b>Fission Product Barrier (FPB) Threshold:</b> <u>Loss</u> 1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier. <u>Potential Loss</u> 2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.</p>	<p><input checked="" type="checkbox"/> No Change    <input type="checkbox"/> Difference    <input type="checkbox"/> Deviation</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>RC1</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      Primary Containment Pressure  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. Primary containment pressure greater than (site-specific value) due to RCS leakage.</p>	<p align="right"><b>RC3</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      Primary Containment Pressure/Conditions  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      1. Drywell pressure &gt;2.0 psig.  <b>AND</b>                      2. Drywell pressure rise is due to RCS leakage.</p>	<p 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>

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NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>RC2</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      RPV Water Level  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. RPV water level cannot be restored and maintained above (site-specific RPV level corresponding to the top of active fuel) or cannot be determined.</p>	<p align="right"><b>RC2</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      RPV Water Level  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      1. RPV water level <u>cannot</u> be restored and maintained &gt; -172 inches (TAF) .  <b>OR</b>                      2. RPV water level <u>cannot</u> be determined.</p>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>RC3</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      RCS Leak Rate  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. UNISOLABLE break in any of the following: ( site-specific systems with potential for high-energy line breaks)  <b>OR</b>                      B. Emergency RPV Depressurization                      Potential Loss                      A. UNISOLABLE primary system leakage that results in exceeding <b>EITHER</b> of the following:                      1. Max Normal Operating Temperature.  <b>OR</b>                      2. Max Normal Operating Area Radiation Level.</p>	<p align="right"><b>RC4</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      RCS Leak Rate  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      1. UNISOLABLE Main Steam Line (MSL), HPCI, Feedwater, RWCU or RCIC line break.  <b>OR</b>                      2. Emergency RPV Depressurization is required.  <u>Potential Loss</u>                      3. UNISOLABLE primary system leakage that results in <b>EITHER</b> of the following:                      a. Secondary Containment area temperature &gt; <b>T-103 Alarm Setpoint.</b>  <b>OR</b>                      b. Secondary Containment area radiation level &gt; <b>T-103 Alarm Setpoint.</b></p>	<p align="center"> <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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>RC4</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      Primary Containment Radiation  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. Primary Containment Radiation Monitor reading greater than (site-specific value).</p>	<p align="right"><b>RC5</b></p> <p><b>Category: Reactor Coolant System Barrier</b>                      Primary Containment Radiation  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      Drywell radiation monitor reading &gt; 100 R/hr.</p>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>RC6</b></p> <p><b>Category: Reactor Coolant System Barrier</b> Emergency Director Judgment <b>Operating Mode Applicability:</b> Power Operation, Startup, Hot Standby, Hot Shutdown <b>Fission Product Barrier Threshold:</b> Loss A. Any Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier. Potential Loss A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.</p>	<p align="right"><b>RC7</b></p> <p><b>Category: Reactor Coolant System Barrier</b> Emergency director Judgment <b>Operating Mode Applicability:</b> 1, 2, 3 <b>Fission Product Barrier (FPB) Threshold:</b> <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><input checked="" type="checkbox"/> No Change    <input type="checkbox"/> Difference    <input type="checkbox"/> Deviation</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>CT1</b></p> <p><b>Category: Containment Barrier</b>                      Primary Containment Conditions  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      C. UNPLANNED rapid drop in primary containment pressure following primary containment pressure rise                      OR                      B. Primary containment pressure response not consistent with LOCA conditions.                      Potential Loss                      D. Primary containment pressure greater than (site-specific value)                      OR                      E. (site-specific explosive mixture) exists inside primary containment                      OR                      3. HCTL exceeded.</p>	<p align="right"><b>CT3</b></p> <p><b>Category: Containment Barrier</b>                      Primary Containment Pressure/Conditions  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      1. UNPLANNED rapid drop in Drywell pressure following Drywell pressure rise.                      OR                      2. Drywell pressure response <u>not</u> consistent with LOCA conditions.  <u>Potential Loss</u>                      3. Drywell pressure &gt; 56 psig and rising.                      OR                      4. a. Drywell or Torus Hydrogen concentration &gt; 6%.                      AND                      b. Drywell or Torus Oxygen concentration &gt; 5%.                      OR                      5. Heat Capacity Limit (T-102 Curve T/T-1) exceeded.</p>	<p align="center"> <input type="checkbox"/> No Change                        <input checked="" type="checkbox"/> Difference                        <input type="checkbox"/> Deviation                 </p> <p>1) Listed site-specific threshold values to ensure timely classification.</p> <p>2) The words "and rising" were added to account for the momentary spike in pressure where pressure is now lowering, the risk of a potential loss of containment is no longer present, this wording is also consistent with present EAL wording.</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>CT2</b></p> <p><b>Category: Containment Barrier</b>                      RPV Water Level  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Potential Loss                      A. Primary containment flooding required.</p>	<p align="right"><b>CT2</b></p> <p><b>Category: Containment Barrier</b>                      RPV Water Level  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Potential Loss</u>                      Plant conditions indicate Primary Containment flooding is required.</p>	<p> <input checked="" type="checkbox"/> No Change                         <input type="checkbox"/> Difference                         <input type="checkbox"/> Deviation                 </p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>CT3</b></p> <p><b>Category: Containment Barrier</b>                      Primary Containment Isolation Failure  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Loss                      A. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal  <b>OR</b>                      B. Intentional primary containment venting per EOPs  <b>OR</b>                      C. UNISOLABLE primary system leakage that results in exceeding <b>EITHER</b> of the following:                          1. Max Safe Operating Temperature.  <b>OR</b>                          2. Max Safe Operating Area Radiation Level.</p>	<p align="right"><b>CT6</b></p> <p><b>Category: Containment Barrier</b>                      Primary Containment Isolation Failure  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Loss</u>                      1. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal.  <b>OR</b>                      2. Intentional Primary Containment venting/purging per EOPs or SAMPs due to accident conditions.  <b>OR</b>                      3. UNISOLABLE primary system leakage that results in <b>EITHER</b> of the following:                          a. Secondary Containment area temperature &gt; <b>T-103 Action Level</b>  <b>OR</b>                          b. Secondary Containment area radiation level &gt; <b>T-103 Action Level</b></p>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>CT4</b></p> <p><b>Category: Containment Barrier</b>                      Primary Containment Radiation  <b>Operating Mode Applicability:</b>                      Power Operation, Startup, Hot Standby, Hot Shutdown  <b>Fission Product Barrier Threshold:</b>                      Potential Loss                      A. Primary Containment Radiation Monitor reading greater than (site-specific value).</p>	<p align="right"><b>CT5</b></p> <p><b>Category: Containment Barrier</b>                      Primary Containment Radiation  <b>Operating Mode Applicability:</b>                      1, 2, 3  <b>Fission Product Barrier (FPB) Threshold:</b>  <u>Potential Loss</u>                      Drywell radiation monitor reading &gt; 2.20 E+03 R/h.</p>	<p> <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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>CT6</b></p> <p><b>Category: Containment Barrier</b> Emergency director Judgment</p> <p><b>Operating Mode Applicability:</b> Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Fission Product Barrier Threshold:</b> Loss</p> <p>A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.</p> <p>Potential Loss</p> <p>A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.</p>	<p align="right"><b>CT7</b></p> <p><b>Category: Containment Barrier</b> Emergency Director Judgment</p> <p><b>Operating Mode Applicability:</b> 1, 2, 3</p> <p><b>Fission Product Barrier (FPB) Threshold:</b> <u>Loss</u></p> <p>1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment 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 Containment Barrier.</p>	<p><input checked="" type="checkbox"/> No Change    <input type="checkbox"/> Difference    <input type="checkbox"/> Deviation</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SG1</b></p> <p><b>Initiating Condition: GENERAL EMERGENCY</b></p> <p>Prolonged loss of all offsite and all onsite AC power to emergency buses.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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 <b>ALL</b> offsite and <b>ALL</b> onsite AC power to (site-specific emergency buses).</p> <p align="center"><b>AND</b></p> <p>b. <b>EITHER</b> of the following:</p> <ul style="list-style-type: none"> <li>• Restoration of at least one emergency bus in less than (site-specific hours) is not likely.</li> <li>• (Site-specific indication of an inability to adequately remove heat from the core)</li> </ul>	<p align="right"><b>MG1</b></p> <p><b>Initiating Condition:</b></p> <p>Prolonged loss of all offsite and all onsite AC power to emergency buses.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1 Loss of <b>ALL</b> offsite AC power to unit 4 KV Safeguards Buses.</p> <p align="center"><b>AND</b></p> <p>2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.</p> <p align="center"><b>AND</b></p> <p>3. <b>EITHER</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Restoration of at least one unit 4KV safeguards Bus in <b>&lt; 2 hours is not</b> likely.</li> <li align="center"><b>OR</b></li> <li>b. RPV water level <b>cannot</b> be restored and maintained <b>&gt; -195 inches</b>.</li> </ul>	<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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SS1</b></p> <p><b>Initiating Condition: SITE AREA EMERGENCY</b></p> <p>Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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>Loss of ALL offsite and ALL onsite AC Power to (site-specific emergency buses) for 15 minutes or longer.</p>	<p align="right"><b>MS1</b></p> <p><b>Initiating Condition:</b></p> <p>Loss of all offsite and onsite AC power to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1. Loss of <b>ALL</b> offsite AC Power to unit 4KV Safeguards Buses.</p> <p><b>AND</b></p> <p>2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.</p> <p><b>AND</b></p> <p>3. Failure to restore power to at least one unit 4KV Safeguards bus in <b>&lt; 15 minutes</b> from the time of loss of both offsite and onsite AC power.</p>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="center"><b>SA1</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> The Emergency Director should declare the Alert 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><b>AND</b></p> <p>b. Any additional single power source failure will result in loss of all AC power to SAFETY SYSTEMS.</p>	<p align="center"><b>MA1</b></p> <p><b>Initiating Condition:</b></p> <p>Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1. AC power capability to unit 4KV Safeguards Buses reduced to only one of the following power sources for <b>≥ 15 minutes</b>.</p> <ul style="list-style-type: none"> <li>• 2 Emergency Auxiliary Transformer (0AX04)</li> <li>• 3 Emergency Auxiliary Transformer (0BX04)</li> <li>• E1 Diesel Generator</li> <li>• E2 Diesel Generator</li> <li>• E3 Diesel Generator</li> <li>• E4 Diesel Generator</li> </ul> <p><b>AND</b></p> <p>2. <b>ANY</b> additional single power source failure will result in a loss of <b>ALL</b> AC power to SAFETY SYSTEMS.</p>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SU1</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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 <b>ALL</b> offsite AC power capability to (site-specific emergency buses) for 15 minutes or longer</p>	<p align="right"><b>MU1</b></p> <p><b>Initiating Condition:</b></p> <p>Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>Loss of <b>ALL</b> offsite AC power capability to unit 4KV Safeguards Buses for <b>≥ 15 minutes</b>.</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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SG8</b></p> <p><b>Initiating Condition: GENERAL EMERGENCY</b></p> <p>Loss of all AC and Vital DC power sources for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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 <b>ALL</b> offsite and <b>ALL</b> onsite AC power to (site-specific emergency buses) for 15 minutes or longer.</p> <p><b>AND</b></p> <p>Indicated voltage is less than (site-specific bus voltage value) on <b>ALL</b> (site-specific vital DC buses) for 15 minutes or longer.</p>	<p align="right"><b>MG2</b></p> <p><b>Initiating Condition:</b></p> <p>Loss of all AC and Vital DC power sources for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1. Loss of <b>ALL</b> offsite AC power to unit 4KV safeguards Buses.</p> <p><b>AND</b></p> <p>2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.</p> <p><b>AND</b></p> <p>3. Voltage is <b>&lt; 107.5 VDC</b> on unit 125 VDC battery buses 2(3)0D021, 2(3)0D022, 2(3)0D023, 2(3)0D024.</p> <p><b>AND</b></p> <p>4. <b>ALL</b> AC and Vital DC power sources have been lost for <b>≥ 15 minutes</b>.</p>	<p align="center"> <input type="checkbox"/> No Change                    <input checked="" type="checkbox"/> Difference                    <input type="checkbox"/> Deviation             </p> <p>1) Listed site-specific 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SS8</b></p> <p><b>Initiating Condition: SITE AREA EMERGENCY</b> Loss of all Vital DC power for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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 <b>ALL</b> Vital DC buses for 15 minutes or longer.</p>	<p align="right"><b>MS2</b></p> <p><b>Initiating Condition:</b> Loss of all Vital DC power for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> 1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>Voltage is <b>&lt;107.5 VDC</b> on 125 VDC battery buses 2(3)0D021, 2(3)0D022, 2(3)0D023, 2(3)0D024 for <b>≥ 15 minutes</b>.</p>	<p align="center"> <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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SS5</b></p> <p><b>Initiating Condition: SITE AREA EMERGENCY</b></p> <p>Inability to shutdown the reactor causing a challenge to (core cooling [PWR] / RPV water level [BWR]) or RCS heat removal.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation</p> <p><b>Example Emergency Action Levels:</b></p> <p>1. a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor.</p> <p align="center"><b>AND</b></p> <p>b. All manual actions to shutdown the reactor have been unsuccessful.</p> <p align="center"><b>AND</b></p> <p>c. EITHER of the following conditions exist:</p> <p>1. (Site-specific indication of an inability to adequately remove heat from the core)</p> <p align="center"><b>OR</b></p> <p>2. (Site-specific indication of an inability to adequately remove heat from the RCS)</p>	<p align="right"><b>MS3</b></p> <p><b>Initiating Condition:</b></p> <p>Inability to shutdown the reactor causing a challenge to RPV water level or RCS heat removal.</p> <p><b>Operating Mode Applicability:</b></p> <p>1,2</p> <p><b>Emergency Action Level (EAL):</b></p> <p>1. Automatic scram did <u>not</u> shutdown the reactor as indicated by Reactor Power &gt; 4%.</p> <p align="center"><b>AND</b></p> <p>2. <b>ALL</b> manual / ARI actions to shutdown the reactor have been unsuccessful as indicated by Reactor Power &gt; 4%.</p> <p align="center"><b>AND</b></p> <p>3. <b>EITHER</b> of the following conditions exist:</p> <ul style="list-style-type: none"> <li>• RPV water level <u>cannot</u> be restored and maintained &gt; -195 inches</li> <li align="center"><b>OR</b></li> <li>• Heat Capacity Limit (T-102 Curve T/T-1) exceeded.</li> </ul>	<p 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> <p>3) Added ARI as an equivalent scram.</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SA5</b></p> <p><b>Initiating Condition: ALERT</b></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><b>Operating Mode Applicability:</b></p> <p>Power Operation</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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 align="center"><b>AND</b></p> <p>b. Manual action taken at the reactor control consoles are not successful in shutting down the reactor.</p>	<p align="right"><b>MA3</b></p> <p><b>Initiating Condition:</b></p> <p>Automatic or manual scram 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><b>Operating Mode Applicability:</b></p> <p>1,2</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>1. Automatic or manual scram did <b>not</b> shutdown the reactor as indicated by Reactor Power &gt; 4%.</p> <p align="center"><b>AND</b></p> <p>2. Manual / ARI actions taken at the Reactor Console are <b>not</b> successful in shutting down the reactor as indicated by Reactor Power &gt; 4%.</p>	<p 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> <p>3) Added ARI as an equivalent scram.</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SU5</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>Automatic or manual (trip [PWR] / scram [BWR]) fails to shutdown the reactor.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation</p> <p><b>Example Emergency Action Levels: (1 or 2)</b></p> <p><b>Note:</b> 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 align="center"><b>AND</b></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 scram ([PWR] / scram [BWR]) did not shutdown the reactor.</p> <p align="center"><b>AND</b></p> <p>b. <b>EITHER</b> 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 align="center"><b>OR</b></p> <p>2. A subsequent automatic (trip [PWR] / scram [BWR]) is successful in shutting down the reactor.</p>	<p align="right"><b>MU3</b></p> <p><b>Initiating Condition:</b></p> <p>Automatic or manual scram fails to shutdown the reactor.</p> <p><b>Operating Mode Applicability:</b></p> <p>1,2</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>1. a. Automatic scram did not shutdown the reactor as indicated by Reactor Power &gt; 4%.</p> <p align="center"><b>AND</b></p> <p>b. Subsequent manual / ARI action taken at the Reactor Console is successful in shutting down the reactor.</p> <p align="center"><b>OR</b></p> <p>2. a. Manual scram did not shutdown the reactor as indicated by Reactor Power &gt; 4%.</p> <p align="center"><b>AND</b></p> <p>b. <b>EITHER</b> of the following:</p> <p>1. Subsequent manual / ARI action taken at the Reactor Console is successful in shutting down the reactor.</p> <p align="center"><b>OR</b></p> <p>2. Subsequent automatic / ARI scram is successful in shutting down the reactor.</p>	<p 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> <p>3) Added ARI as an equivalent scram.</p>

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NEI 99-01 Rev 6	Proposed EAL	Justification																		
<p align="right"><b>SA2</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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="96 687 684 1030"> <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><b>AND</b></p> <p>b. Any of the following transient events in progress.</p> <ul style="list-style-type: none"> <li>Automatic or Manual runback greater than 25% thermal reactor power</li> <li>Electrical load rejection greater than 25% full electrical load</li> <li>Reactor Scram [BWR] / trip [PWR]</li> <li>ECCS (SI) actuation</li> <li>Thermal power oscillations greater than 10% [BWR]</li> </ul>	[ 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 align="right"><b>MA4</b></p> <p><b>Initiating Condition:</b></p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1. UNPLANNED event results in the inability to monitor <b>ANY</b> Table M1 parameters from within the Control Room for <b>≥15 minutes</b>.</p> <table border="1" data-bbox="835 731 1251 943"> <thead> <tr> <th>Table M1 Control Room Parameters</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>Reactor Power</li> <li>RPV Water Level</li> <li>RPV Pressure</li> <li>Primary Containment Pressure</li> <li>Torus Level</li> <li>Torus Temperature</li> </ul> </td> </tr> </tbody> </table> <p><b>AND</b></p> <p>2. <b>ANY</b> Table M2 transient in progress.</p> <table border="1" data-bbox="730 1017 1356 1252"> <thead> <tr> <th>Table M2 Significant Transients</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>Automatic or Manual Runback &gt;25% thermal reactor power</li> <li>Electrical Load Rejection &gt;25% full electrical load</li> <li>Reactor Scram</li> <li>ECCS Actuation</li> <li>Thermal Power oscillations &gt; 10%</li> </ul> </td> </tr> </tbody> </table>	Table M1 Control Room Parameters	<ul style="list-style-type: none"> <li>Reactor Power</li> <li>RPV Water Level</li> <li>RPV Pressure</li> <li>Primary Containment Pressure</li> <li>Torus Level</li> <li>Torus Temperature</li> </ul>	Table M2 Significant Transients	<ul style="list-style-type: none"> <li>Automatic or Manual Runback &gt;25% thermal reactor power</li> <li>Electrical Load Rejection &gt;25% full electrical load</li> <li>Reactor Scram</li> <li>ECCS Actuation</li> <li>Thermal Power oscillations &gt; 10%</li> </ul>	<p align="center"> <input checked="" type="checkbox"/> No Change                     <input type="checkbox"/> Difference                     <input type="checkbox"/> Deviation             </p>
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<p align="right"><b>SA9</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b></p> <p>1. a. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> <li>• Seismic event (earthquake)</li> <li>• Internal or external flooding event</li> <li>• High winds or tornado strike</li> <li>• FIRE</li> <li>• EXPLOSION</li> <li>• (site-specific hazards)</li> <li>• Other events with similar hazard characteristics as determined by the Shift Manager</li> </ul> <p align="center"><b>AND</b></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 align="center"><b>OR</b></p> <p>2. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode.</p>	<p align="right"><b>MA5</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>Hazardous event affecting a SAFETY SYSTEM required for the current operating mode.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• If it is determined that the conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.</li> </ul> <p>1. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> <li>• Seismic event (earthquake)</li> <li>• Internal or external flooding event</li> <li>• High winds or tornado strike</li> <li>• FIRE</li> <li>• EXPLOSION</li> <li>• Other events with similar hazard characteristics as determined by the Shift Manager</li> </ul> <p align="center"><b>AND</b></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 align="center"><b>OR</b></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 align="center"> <input type="checkbox"/> No Change    <input checked="" type="checkbox"/> Difference    <input type="checkbox"/> Deviation </p> <p>1) No additional site-specific hazards noted</p> <p>2) Changed the word "needed" to "required" in the IC and "required by Technical Specifications" in the EAL to be consistent with terminology used by operators and minimize confusion.</p> <p>3) Added additional note to easily direct the operator to lesser ICs</p>

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NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>SU4</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>RCS leakage for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels: (1 or 2 or 3)</b></p> <p><b>Note:</b> 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"> <li>RCS unidentified or pressure boundary leakage greater than (site-specific value) for 15 minutes or longer.</li> <li>RCS identified leakage greater than (site-specific value) for 15 minutes or longer</li> <li>Leakage from the RCS to a location outside containment greater than 25 gpm for 15 minutes or longer</li> </ol>	<p align="right"><b>MU6</b></p> <p><b>Initiating Condition:</b></p> <p>RCS leakage for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <ol style="list-style-type: none"> <li>RCS unidentified or pressure boundary leakage in the Drywell &gt; 10 gpm for <math>\geq</math> 15 minutes. <b>OR</b></li> <li>RCS identified leakage in the Drywell &gt;25 gpm for <math>\geq</math> 15 minutes. <b>OR</b></li> <li>Leakage from the RCS to a location outside the Drywell &gt;25 gpm for <math>\geq</math> 15 minutes.</li> </ol>	<p align="center"> <input type="checkbox"/> No Change                    <input checked="" type="checkbox"/> Difference                    <input type="checkbox"/> Deviation             </p> <p>1) Listed site-specific values to ensure timely classification.</p> <p>2) In EAL #3 Changed wording from containment to Drywell for clarity to better define the primary containment structure.</p> <p>3) In EAL #1 and 2, added "into the Drywell" to differentiate between EAL #1/2 and #3. Without this wording would have been in EAL #1 or #2 concurrent with #3. With the added wording each EAL can be called separately.</p>

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<p align="right"><b>SU6</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>Loss of all onsite or offsite communications capabilities</p> <p><b>Operating Mode Applicability:</b></p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p><b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <ol style="list-style-type: none"> <li>Loss of <b>ALL</b> of the following onsite communication methods:  (site-specific list of communications method)</li> <li>Loss of <b>ALL</b> of the following ORO communications s) methods:  (site-specific list of communications methods)</li> <li>Loss of <b>ALL</b> of the following NRC communications methods:  (site-specific list of communications methods)</li> </ol>	<p align="right"><b>MU7</b></p> <p><b>Initiating Condition:</b></p> <p>Loss of all onsite or offsite communication capabilities.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3</p> <p><b>Emergency Action Level (EAL):</b></p> <ol style="list-style-type: none"> <li>Loss of <b>ALL</b> Table M3 <b>Onsite</b> communications capability affecting the ability to perform routine operations.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>Loss of <b>ALL</b> Table M3 <b>Offsite</b> communication capability affecting the ability to perform offsite notifications.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>Loss of <b>ALL</b> Table M3 <b>NRC</b> communication capability affecting the ability to perform NRC notifications.</li> </ol> <table border="1" data-bbox="751 799 1356 1063"> <thead> <tr> <th align="center" colspan="4">Table M3 Communications Capability</th> </tr> <tr> <th align="center">System</th> <th align="center">Onsite</th> <th align="center">Offsite</th> <th align="center">NRC</th> </tr> </thead> <tbody> <tr> <td>Station Radio System</td> <td align="center">X</td> <td></td> <td></td> </tr> <tr> <td>Plant Public Address (PA)</td> <td align="center">X</td> <td></td> <td></td> </tr> <tr> <td>OMNI System</td> <td align="center">X</td> <td align="center">X</td> <td></td> </tr> <tr> <td>Station Phones</td> <td align="center">X</td> <td align="center">X</td> <td align="center">X</td> </tr> <tr> <td>Satellite Phones</td> <td></td> <td align="center">X</td> <td align="center">X</td> </tr> <tr> <td>NARS</td> <td></td> <td align="center">X</td> <td></td> </tr> <tr> <td>HPN</td> <td></td> <td align="center">X</td> <td align="center">X</td> </tr> <tr> <td>ENS</td> <td></td> <td align="center">X</td> <td align="center">X</td> </tr> </tbody> </table>	Table M3 Communications Capability				System	Onsite	Offsite	NRC	Station Radio System	X			Plant Public Address (PA)	X			OMNI System	X	X		Station Phones	X	X	X	Satellite Phones		X	X	NARS		X		HPN		X	X	ENS		X	X	<p align="center"> <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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<p align="right"><b>CA2</b></p> <p><b>Initiating Condition: ALERT</b> Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling, Defueled</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> The Emergency Director should declare the Alert 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 align="right"><b>CA1</b></p> <p><b>Initiating Condition:</b> Loss of all offsite and onsite AC power to emergency buses for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <ol style="list-style-type: none"> <li>Loss of <b>ALL</b> offsite AC power to unit 4KV Safeguards Buses.</li> </ol> <p align="center"><b>AND</b></p> <ol style="list-style-type: none"> <li>Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.</li> </ol> <p align="center"><b>AND</b></p> <ol style="list-style-type: none"> <li>Failure to restore power to at least one unit 4KV Safeguards bus in <b>&lt; 15 minutes</b> from the time of loss of both offsite and onsite AC power.</li> </ol>	<p 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>

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<p align="center"><b>CU2</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b>                      Loss of all but one AC power source to emergency buses for 15 minutes or longer.  <b>Operating Mode Applicability:</b>                      Cold Shutdown, Refueling, Defueled  <b>Example Emergency Action Levels:</b>  <b>Note:</b> 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"> <li>1. a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer.</li> </ol> <p><b>AND</b></p> <ol style="list-style-type: none"> <li>b. Any additional single power source failure will result in loss of all AC power to SAFETY SYSTEMS.</li> </ol>	<p align="center"><b>CU1</b></p> <p><b>Initiating Condition:</b>                      Loss of all but one AC power source to emergency buses for 15 minutes or longer.  <b>Operating Mode Applicability:</b>                      4, 5, D  <b>Emergency Action Level (EAL):</b>  <b>Note:</b></p> <ul style="list-style-type: none"> <li>• The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.                         <ol style="list-style-type: none"> <li>1. AC power capability to unit 4KV Safeguards Buses reduced to only one of the following power sources for <b>≥ 15 minutes</b>.                                 <ul style="list-style-type: none"> <li>• 2 Emergency Auxiliary Transformer (0AX04)</li> <li>• 3 Emergency Auxiliary Transformer (0BX04)</li> <li>• E1 Diesel Generator</li> <li>• E2 Diesel Generator</li> <li>• E3 Diesel Generator</li> <li>• E4 Diesel Generator</li> </ul> </li> </ol> </li> </ul> <p><b>AND</b></p> <ol style="list-style-type: none"> <li>2. <b>ANY</b> additional single power source failure will result in a loss of <b>ALL</b> AC power to SAFETY SYSTEMS.</li> </ol>	<p 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>

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<p align="right"><b>CA6</b></p> <p><b>Initiating Condition – ALERT</b> Hazardous event affecting SAFETY SYSTEM needed for the current operating mode.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling</p> <p><b>Example Emergency Action Levels:</b></p> <p>1. a. The occurrence of <b>ANY</b> of the following hazardous events:</p> <ul style="list-style-type: none"> <li>● Seismic event (earthquake)</li> <li>● Internal or external flooding event</li> <li>● High winds or tornado strike</li> <li>● FIRE</li> <li>● EXPLOSION</li> <li>● (site-specific hazards)</li> <li>● Other events with similar hazard characteristics as determined by the Shift Manager</li> </ul> <p><b>AND</b></p> <p>b. <b>EITHER</b> 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><b>OR</b></p> <p>2. The event has caused <b>VISIBLE DAMAGE</b> to a SAFETY SYSTEM component or structure needed for the current operating mode.</p>	<p align="right"><b>CA2</b></p> <p><b>Initiating Condition:</b> Hazardous event affecting SAFETY SYSTEM required for the current operating mode.</p> <p><b>Operating Mode Applicability:</b> 4, 5</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>● If it is determined that the conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.</li> </ul> <p>1. The occurrence of <b>ANY</b> of the following hazardous events:</p> <ul style="list-style-type: none"> <li>● Seismic event (earthquake)</li> <li>● Internal or external flooding event</li> <li>● High winds or tornado strike</li> <li>● FIRE</li> <li>● EXPLOSION</li> <li>● Other events with similar hazard characteristics as determined by the Shift Manager</li> </ul> <p><b>AND</b></p> <p>2. <b>EITHER</b> 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><b>OR</b></p> <p>b. The event has caused <b>VISIBLE DAMAGE</b> to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.</p>	<p align="center"> <input type="checkbox"/> No Change     <input checked="" type="checkbox"/> Difference     <input type="checkbox"/> Deviation </p> <p>1) No additional site-specific hazards noted</p> <p>2) Changed the word "needed" to "required" in the IC and "required by Technical Specifications" in the EAL to be consistent with terminology used by operators and minimize confusion.</p> <p>3) Added additional note to easily direct the operator to lesser ICs</p>

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<p align="right"><b>CU4</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b> Loss of Vital DC power for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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 align="right"><b>CU3</b></p> <p><b>Initiating Condition:</b> Loss of Vital DC power for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> 4, 5</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>Voltage is &lt; <b>107.5 VDC</b> on required 125 VDC battery buses 2(3)0D021, 2(3)0D022, 2(3)0D023, and 2(3)0D024 for <b>≥ 15 minutes</b>.</p>	<p align="center"> <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>

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NEI 99-01 Rev 6	Proposed EAL	Justification																																								
<p align="right"><b>CU5</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b>                      Loss of all onsite or offsite communications capabilities  <b>Operating Mode Applicability:</b>                      Cold Shutdown, Refueling, Defueled  <b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <ol style="list-style-type: none"> <li>Loss of <b>ALL</b> of the following onsite communication methods:                              (site-specific list of communications method)</li> <li>Loss of <b>ALL</b> of the following ORO communications s) methods:                              (site-specific list of communications methods)</li> <li>Loss of <b>ALL</b> of the following NRC communications methods:                              (site-specific list of communications methods)</li> </ol>	<p align="right"><b>CU4</b></p> <p><b>Initiating Condition:</b>                      Loss of all onsite or offsite communication capabilities.  <b>Operating Mode Applicability:</b>                      4, 5, D  <b>Emergency Action Level (EAL):</b></p> <ol style="list-style-type: none"> <li>Loss of <b>ALL</b> Table C1 <b>Onsite</b> communications capability affecting the ability to perform routine operations.  <b>OR</b></li> <li>Loss of <b>ALL</b> Table C1 <b>Offsite</b> communication capability affecting the ability to perform offsite notifications.  <b>OR</b></li> <li>Loss of <b>ALL</b> Table C1 <b>NRC</b> communication capability affecting the ability to perform NRC notifications.</li> </ol> <table border="1" data-bbox="747 674 1365 938"> <thead> <tr> <th align="center" colspan="4">Table C1 Communications Capability</th> </tr> <tr> <th align="center">System</th> <th align="center">Onsite</th> <th align="center">Offsite</th> <th align="center">NRC</th> </tr> </thead> <tbody> <tr> <td>Station Radio System</td> <td align="center">X</td> <td></td> <td></td> </tr> <tr> <td>Plant Public Address (PA)</td> <td align="center">X</td> <td></td> <td></td> </tr> <tr> <td>OMNI System</td> <td align="center">X</td> <td align="center">X</td> <td></td> </tr> <tr> <td>Station Phones</td> <td align="center">X</td> <td align="center">X</td> <td align="center">X</td> </tr> <tr> <td>Satellite Phones</td> <td></td> <td align="center">X</td> <td align="center">X</td> </tr> <tr> <td>NARS</td> <td></td> <td align="center">X</td> <td></td> </tr> <tr> <td>HPN</td> <td></td> <td align="center">X</td> <td align="center">X</td> </tr> <tr> <td>ENS</td> <td></td> <td align="center">X</td> <td align="center">X</td> </tr> </tbody> </table>	Table C1 Communications Capability				System	Onsite	Offsite	NRC	Station Radio System	X			Plant Public Address (PA)	X			OMNI System	X	X		Station Phones	X	X	X	Satellite Phones		X	X	NARS		X		HPN		X	X	ENS		X	X	<p align="center"> <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																																										
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NEI 99-01 Rev 6	Proposed EAL	Justification																						
CA3	CA5	<input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation																						
<p><b>Initiating Condition: ALERT</b> Inability to maintain the plant in cold shutdown.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling</p> <p><b>Example Emergency Action Levels:</b> (1 or 2)</p> <p><b>Note:</b> The Emergency Director should declare the Alert promptly upon determining that the applicable has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> <li>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.</li> <li>UNPLANNED RCS pressure increase greater than (site-specific pressure reading). (This EAL does not apply during water-solid plant conditions. [PWR])</li> </ol> <table border="1"> <caption>Table: RCS Heat-up Duration Thresholds</caption> <thead> <tr> <th>RCS Status</th> <th>Containment Closure Status</th> <th>Heat-up Duration</th> </tr> </thead> <tbody> <tr> <td>Intact (but not RCS Reduced Inventory [PWR])</td> <td align="center">Not Applicable</td> <td align="center">60 minutes*</td> </tr> <tr> <td rowspan="2">Not Intact (or at reduced inventory [PWR])</td> <td align="center">Established</td> <td align="center">20 minutes*</td> </tr> <tr> <td align="center">Not Established</td> <td align="center">0 minutes</td> </tr> </tbody> </table> <p>* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, the EAL is not applicable.</p>	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	<p><b>Initiating Condition:</b> Inability to maintain plant in cold shutdown.</p> <p><b>Operating Mode Applicability:</b> 4, 5</p> <p><b>Emergency Action Levels (EAL):</b></p> <p><b>Note:</b> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.</p> <ol style="list-style-type: none"> <li>UNPLANNED rise in RCS temperature &gt; 212°F for &gt; Table C2 duration.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>UNPLANNED RCS pressure rise &gt; 10 psig as a result of temperature rise.</li> </ol> <table border="1"> <caption>Table C2 – RCS Heat-up Duration Thresholds</caption> <thead> <tr> <th>RCS Status</th> <th>Containment Closure Status</th> <th>Heat-up Duration</th> </tr> </thead> <tbody> <tr> <td>Intact</td> <td align="center">Not Applicable</td> <td align="center">60 minutes*</td> </tr> <tr> <td rowspan="2">Not Intact</td> <td align="center">Established</td> <td align="center">20 minutes*</td> </tr> <tr> <td align="center">Not Established</td> <td align="center">0 minutes</td> </tr> </tbody> </table> <p>* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, then EAL #1 is <b>not</b> applicable.</p>	RCS Status	Containment Closure Status	Heat-up Duration	Intact	Not Applicable	60 minutes*	Not Intact	Established	20 minutes*	Not Established	0 minutes	<ol style="list-style-type: none"> <li>Listed site specific Technical Specification cold shutdown temperature limit to ensure timely classification.</li> <li>Listed site specific pressure reading to enhance timely classification.</li> <li>Added wording relating the temp and press rise to a loss of decay heat removal capability as per the developer notes for PWR's</li> <li>Added the following note, taken from the basis section of the EAL, to bring it to the attention of the SM/ED when using the "procedure matrix" (11x17 quick reference control room document) "A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification."</li> </ol>
RCS Status	Containment Closure Status	Heat-up Duration																						
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NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>CU3</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b> UNPLANNED increase in RCS temperature.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling</p> <p><b>Example Emergency Action Levels:</b> (1 or 2)</p> <p><b>Note:</b> 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"> <li>UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit).</li> <li>Loss of <b>ALL</b> RCS temperature and (reactor vessel/RCS [PWR] or RPV [BWR]) level indication for 15 minutes or longer.</li> </ol>	<p align="right"><b>CU5</b></p> <p><b>Initiating Condition:</b> UNPLANNED rise in RCS temperature.</p> <p><b>Operating Mode Applicability:</b> 4, 5</p> <p><b>Emergency Action Levels (EAL):</b></p> <p><b>Note:</b> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.</p> <ol style="list-style-type: none"> <li>UNPLANNED rise in RCS temperature &gt; 212°F.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>Loss of the following for <math>\geq</math> 15 minutes. <ul style="list-style-type: none"> <li><b>ALL</b> RCS temperature indications</li> <li><b>AND</b></li> <li><b>ALL</b> RPV level indications</li> </ul> </li> </ol>	<p align="center"> <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> <p>3) Added the following note, taken from the basis section of the EAL, to bring it to the attention of the SM/ED when using the "procedure matrix" (11x17 quick reference control room document) "A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification."</p>

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NEI 99-01 Rev 6	Proposed EAL	Justification				
<p align="right"><b>CG1</b></p> <p><b>Initiating Condition: GENERAL EMERGENCY</b></p> <p>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory affecting fuel clad integrity with containment challenged.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling</p> <p><b>Example Emergency Action Levels:</b> (1 or 2)</p> <p><b>Note:</b> The Emergency Director should declare the General Emergency 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 align="center"><b>AND</b></p> <p>b. <b>ANY</b> 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 align="center"><b>AND</b></p> <p>b. Core uncover is indicated by <b>ANY</b> of the following:</p> <ul style="list-style-type: none"> <li>(Site-specific radiation monitor) reading greater than (site-specific value)</li> <li>Erratic source range monitor indication [PWR]</li> <li>UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover</li> <li>(Other site-specific indications)</li> </ul> <p align="center"><b>AND</b></p> <p>c. <b>ANY</b> indication from the Containment Challenge Table).</p> <table border="1" data-bbox="113 984 722 1182"> <tr> <td> <p><b>Table: Containment Challenge Table</b></p> <ul style="list-style-type: none"> <li>CONTAINMENT CLOSURE not established*</li> <li>(Explosive mixture) exists inside containment</li> <li>UNPLANNED increase in containment pressure</li> <li>Secondary containment radiation monitor reading above (site-specific value) [BWR]</li> </ul> <p>* 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> </td> </tr> </table>	<p><b>Table: Containment Challenge Table</b></p> <ul style="list-style-type: none"> <li>CONTAINMENT CLOSURE not established*</li> <li>(Explosive mixture) exists inside containment</li> <li>UNPLANNED increase in containment pressure</li> <li>Secondary containment radiation monitor reading above (site-specific value) [BWR]</li> </ul> <p>* 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>	<p align="right"><b>CG6</b></p> <p><b>Initiating Condition:</b> Loss of RPV inventory affecting fuel clad integrity with containment challenged.</p> <p><b>Operating Mode Applicability:</b> 4, 5</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1. a. RPV water level &lt; -172 inches (TAF) for <b>≥ 30 minutes</b>.</p> <p align="center"><b>AND</b></p> <p>b. <b>ANY</b> Containment Challenge Indication (Table C4)</p> <p align="center"><b>OR</b></p> <p>2. a. RPV water level <u>cannot</u> be monitored for <b>≥ 30 minutes</b>.</p> <p align="center"><b>AND</b></p> <p>b. Core uncover is indicated by <b>ANY</b> of the following:</p> <ul style="list-style-type: none"> <li>Table C3 indications of a sufficient magnitude to indicate core uncover.</li> <li><b>OR</b></li> <li><b>ANY</b> Table C5 Refuel Floor Area Radiation Monitor &gt;3 R/hr.</li> </ul> <p align="center"><b>AND</b></p> <p>c. <b>ANY</b> Containment Challenge Indication (Table C4)</p> <table border="1" data-bbox="764 723 1331 926"> <tr> <td align="center"> <p><b>Table C3 Indications of RCS Leakage</b></p> <ul style="list-style-type: none"> <li>UNPLANNED floor or equipment sump level rise*</li> <li>UNPLANNED Torus level rise*</li> <li>UNPLANNED vessel make up rate rise</li> <li>Observation of leakage or inventory loss</li> </ul> <p>*Rise in level is attributed to a loss of RPV inventory.</p> </td> </tr> </table> <table border="1" data-bbox="743 930 1352 1161"> <tr> <td align="center"> <p><b>Table C4 Containment Challenge Indications</b></p> <ul style="list-style-type: none"> <li>Primary Containment Hydrogen Concentration <b>≥ 6%</b> and Oxygen <b>≥ 5%</b></li> <li>UNPLANNED rise in containment pressure</li> <li>CONTAINMENT CLOSURE <u>not</u> established*</li> <li><b>ANY</b> Secondary Containment radiation monitor &gt; T-103 Action Level</li> </ul> <p>* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is <u>not</u> required.</p> </td> </tr> </table> <table border="1" data-bbox="852 1164 1241 1361"> <tr> <td align="center"> <p><b>Table C5 Refuel Floor ARM's</b></p> <ul style="list-style-type: none"> <li>Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul> </td> </tr> </table>	<p><b>Table C3 Indications of RCS Leakage</b></p> <ul style="list-style-type: none"> <li>UNPLANNED floor or equipment sump level rise*</li> <li>UNPLANNED Torus level rise*</li> <li>UNPLANNED vessel make up rate rise</li> <li>Observation of leakage or inventory loss</li> </ul> <p>*Rise in level is attributed to a loss of RPV inventory.</p>	<p><b>Table C4 Containment Challenge Indications</b></p> <ul style="list-style-type: none"> <li>Primary Containment Hydrogen Concentration <b>≥ 6%</b> and Oxygen <b>≥ 5%</b></li> <li>UNPLANNED rise in containment pressure</li> <li>CONTAINMENT CLOSURE <u>not</u> established*</li> <li><b>ANY</b> Secondary Containment radiation monitor &gt; T-103 Action Level</li> </ul> <p>* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is <u>not</u> required.</p>	<p><b>Table C5 Refuel Floor ARM's</b></p> <ul style="list-style-type: none"> <li>Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>	<p align="center"> <input type="checkbox"/> No Change    <input checked="" type="checkbox"/> Difference    <input type="checkbox"/> Deviation     </p> <p>1) Listed site-specific levels, radiation monitors, and sumps and tanks to ensure timely classification.</p> <p>2) Listed Explosive mixture in the Containment Challenge Table to ensure timely classification.</p>
<p><b>Table: Containment Challenge Table</b></p> <ul style="list-style-type: none"> <li>CONTAINMENT CLOSURE not established*</li> <li>(Explosive mixture) exists inside containment</li> <li>UNPLANNED increase in containment pressure</li> <li>Secondary containment radiation monitor reading above (site-specific value) [BWR]</li> </ul> <p>* 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>						
<p><b>Table C3 Indications of RCS Leakage</b></p> <ul style="list-style-type: none"> <li>UNPLANNED floor or equipment sump level rise*</li> <li>UNPLANNED Torus level rise*</li> <li>UNPLANNED vessel make up rate rise</li> <li>Observation of leakage or inventory loss</li> </ul> <p>*Rise in level is attributed to a loss of RPV inventory.</p>						
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NEI 99-01 Rev 6	Proposed EAL	Justification					
<p align="right"><b>CS1</b></p> <p><b>Initiating Condition: SITE AREA EMERGENCY</b></p> <p>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory affecting core decay heat removal capability.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling</p> <p><b>Example Emergency Action Levels:</b> (1 or 2 or 3)</p> <p><b>Note:</b> The Emergency Director should declare the Site Area Emergency 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><b>AND</b></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><b>AND</b></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><b>AND</b></p> <p>b. Core uncover is indicated by ANY of the following:</p> <ul style="list-style-type: none"> <li>• (Site-specific radiation monitor) reading greater than (site-specific value)</li> <li>• Erratic source range monitor indication [PWR]</li> <li>• UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover</li> <li>• (Other site-specific indications)</li> </ul>	<p align="right"><b>CS6</b></p> <p><b>Initiating Condition:</b> Loss of RPV inventory affecting core decay heat removal capabilities.</p> <p><b>Operating Mode Applicability:</b> 4, 5</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1. With CONTAINMENT CLOSURE <u>not</u> established, RPV water level &lt; -160 inches</p> <p><b>OR</b></p> <p>2. With CONTAINMENT CLOSURE established, RPV water level &lt; -172 inches (TAF)</p> <p><b>OR</b></p> <p>3. a. RPV water level <u>cannot</u> be monitored for ≥ 30 minutes</p> <p><b>AND</b></p> <p>b. Core uncover is indicated by ANY of the following:</p> <ul style="list-style-type: none"> <li>• Table C3 indications of a sufficient magnitude to indicate core uncover.</li> <li><b>OR</b></li> <li>• ANY Table C5 Refuel Floor Area Radiation Monitor &gt;3 R/hr</li> </ul> <table border="1" data-bbox="743 877 1352 1105" style="width: 100%; border-collapse: collapse;"> <tr> <td align="center"><b>Table C3 Indications of RCS Leakage</b></td> </tr> <tr> <td> <ul style="list-style-type: none"> <li>• UNPLANNED floor or equipment sump level rise*</li> <li>• UNPLANNED Torus level rise*</li> <li>• UNPLANNED vessel make up rate rise</li> <li>• Observation of leakage or inventory loss</li> </ul> </td> </tr> <tr> <td>Rise in level is attributed to a loss of RPV inventory.</td> </tr> </table> <table border="1" data-bbox="863 1108 1232 1346" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td align="center"><b>Table C5 Refuel Floor ARM's</b></td> </tr> <tr> <td> <ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul> </td> </tr> </table>	<b>Table C3 Indications of RCS Leakage</b>	<ul style="list-style-type: none"> <li>• UNPLANNED floor or equipment sump level rise*</li> <li>• UNPLANNED Torus level rise*</li> <li>• UNPLANNED vessel make up rate rise</li> <li>• Observation of leakage or inventory loss</li> </ul>	Rise in level is attributed to a loss of RPV inventory.	<b>Table C5 Refuel Floor ARM's</b>	<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>	<p 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, radiation monitors, and sumps and tanks to ensure timely classification.</p>
<b>Table C3 Indications of RCS Leakage</b>							
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Rise in level is attributed to a loss of RPV inventory.							
<b>Table C5 Refuel Floor ARM's</b>							
<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>							

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>CA1</b></p> <p><b>Initiating Condition: ALERT</b>                      Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory  <b>Operating Mode Applicability:</b>                      Cold Shutdown, Refueling  <b>Example Emergency Action Levels: (1 or 2)</b>  <b>Note:</b> The Emergency Director should declare the Alert promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> <li>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory as indicated by level less than (site-specific level).</li> <li> <ol style="list-style-type: none"> <li>(Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored for 15 minutes or longer</li> </ol> </li> </ol> <p><b>AND</b></p> <ol style="list-style-type: none"> <li>UNPLANNED increase in (site-specific sump and/or tank) levels due to a loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory.</li> </ol>	<p align="right"><b>CA6</b></p> <p><b>Initiating Condition:</b>                      Loss of RPV inventory  <b>Operating Mode Applicability:</b>                      4, 5  <b>Emergency Action Level (EAL):</b>  <b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <ol style="list-style-type: none"> <li>Loss of RPV inventory as indicated by level &lt; - 48 inches.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li> <ol style="list-style-type: none"> <li>RPV water level <b>cannot</b> be monitored for <math>\geq 15</math> minutes.</li> </ol> </li> </ol> <p align="center"><b>AND</b></p> <ol style="list-style-type: none"> <li>Loss of RPV inventory per Table C3 indications.</li> </ol> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p align="center"><b>Table C3 Indications of RCS Leakage</b></p> <ul style="list-style-type: none"> <li>UNPLANNED floor or equipment sump level rise*</li> <li>UNPLANNED Torus level rise*</li> <li>UNPLANNED vessel make up rate rise</li> <li>Observation of leakage or inventory loss</li> </ul> <p align="center">*Rise in level is attributed to a loss of RPV inventory.</p> </div>	<p align="center"> <input type="checkbox"/> No Change                        <input checked="" type="checkbox"/> Difference                        <input type="checkbox"/> Deviation                 </p> <p>1) Listed site-specific levels, and sumps and tanks to ensure timely classification.</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification			
<p align="right"><b>CU1</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>UNPLANNED loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> Cold Shutdown, Refueling</p> <p><b>Example Emergency Action Levels:</b> (1 or 2)</p> <p><b>Note:</b> 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"> <li>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.</li> <li>a. (Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored.</li> </ol> <p align="center"><b>AND</b></p> <ol style="list-style-type: none"> <li>UNPLANNED increase in (site-specific sump and/or tank) levels.</li> </ol>	<p align="right"><b>CU6</b></p> <p><b>Initiating Condition:</b></p> <p>UNPLANNED loss of RPV inventory for 15 minutes or longer.</p> <p><b>Operating Mode Applicability:</b> 4, 5</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <ol style="list-style-type: none"> <li>UNPLANNED loss of reactor coolant results in the inability to restore and maintain RPV water level above the <b>procedurally established lower limit</b> for <b>≥ 15 minutes</b>.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>RPV water level <u>cannot</u> be monitored</li> </ol> <p align="center"><b>AND</b></p> <ol style="list-style-type: none"> <li>Loss of RPV inventory per Table C3 indications.</li> </ol> <table border="1" data-bbox="751 789 1362 1053"> <thead> <tr> <th align="center">Table C3 Indications of RCS Leakage</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>UNPLANNED floor or equipment sump level rise*</li> <li>UNPLANNED Torus level rise*</li> <li>UNPLANNED vessel make up rate rise</li> <li>Observation of leakage or inventory loss</li> </ul> </td> </tr> <tr> <td align="center">*Rise in level is attributed to a loss of RPV inventory.</td> </tr> </tbody> </table>	Table C3 Indications of RCS Leakage	<ul style="list-style-type: none"> <li>UNPLANNED floor or equipment sump level rise*</li> <li>UNPLANNED Torus level rise*</li> <li>UNPLANNED vessel make up rate rise</li> <li>Observation of leakage or inventory loss</li> </ul>	*Rise in level is attributed to a loss of RPV inventory.	<p align="center"> <input type="checkbox"/> No Change                    <input checked="" type="checkbox"/> Difference                    <input type="checkbox"/> Deviation             </p> <p>1) Described "a required lower limit" as a procedurally established lower limit, and listed site-specific sumps and tanks to ensure timely classification.</p>
Table C3 Indications of RCS Leakage					
<ul style="list-style-type: none"> <li>UNPLANNED floor or equipment sump level rise*</li> <li>UNPLANNED Torus level rise*</li> <li>UNPLANNED vessel make up rate rise</li> <li>Observation of leakage or inventory loss</li> </ul>					
*Rise in level is attributed to a loss of RPV inventory.					

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HG1</b></p> <p><b>Initiating Condition: GENERAL EMERGENCY</b></p> <p>HOSTILE ACTION resulting in loss of physical control of the facility.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></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 align="center"><b>AND</b></p> <p>b. EITHER of the following:</p> <p>1. ANY of the following safety functions cannot be controlled or maintained.</p> <ul style="list-style-type: none"> <li>▪ Reactivity control</li> <li>▪ Core cooling [PWR] / RPV water level [BWR]</li> <li>▪ RCS heat removal</li> </ul> <p align="center"><b>OR</b></p> <p>2. Damage to spent fuel has occurred or is IMMINENT</p>	<p align="right"><b>HG1</b></p> <p><b>Initiating Condition:</b></p> <p>HOSTILE ACTION resulting in loss of physical control of the facility.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p>1. A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.</p> <p align="center"><b>AND</b></p> <p>2. a. ANY Table H1 safety function <u>cannot</u> be controlled or maintained.</p> <p align="center"><b>OR</b></p> <p>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 align="center"><b>Table H1 Safety Functions</b></p> <ul style="list-style-type: none"> <li>• Reactivity Control (ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul> </div>	<p 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HS1</b></p> <p><b>Initiating Condition: SITE AREA EMERGENCY</b></p> <p>HOSTILE ACTION within the Protected Area.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></p> <p>A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-security shift supervision).</p>	<p align="right"><b>HS1</b></p> <p><b>Initiating Condition:</b></p> <p>HOSTILE ACTION within the Protected Area.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HA1</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels: (1 or 2)</b></p> <ol style="list-style-type: none"> <li>1. A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the (site-specific security shift supervision).</li> <li>2. A validated notification from NRC of an aircraft attack threat within 30 minutes of the site.</li> </ol>	<p align="right"><b>HA1</b></p> <p><b>Initiating Condition:</b></p> <p>HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <ol style="list-style-type: none"> <li>1. A validated notification from NRC of an aircraft attack threat &lt; 30 minutes from the site.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>2. Notification by the Security Force that a HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA.</li> </ol>	<p align="center"> <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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HU1</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b> Confirmed SECURITY CONDITION or threat.</p> <p><b>Operating Mode Applicability:</b> All</p> <p><b>Example Emergency Action Levels: (1 or 2 or 3)</b></p> <ol style="list-style-type: none"> <li>1. A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the (site-specific security shift supervision).</li> <li>2. Notification of a credible security threat directed at the site.</li> <li>3. A validated notification from the NRC providing information of an aircraft threat.</li> </ol>	<p align="right"><b>HU1</b></p> <p><b>Initiating Condition:</b> Confirmed SECURITY CONDITION or threat.</p> <p><b>Operating Mode Applicability:</b> 1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <ol style="list-style-type: none"> <li>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.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>2. A validated notification from the NRC providing information of an aircraft threat.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>3. Notification by the Security Force of a SECURITY CONDITION that does <b>not</b> involve a HOSTILE ACTION.</li> </ol>	<p 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) Further described credible security threat through listing a site-specific procedure.</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification		
<p align="right"><b>HS6</b></p> <p><b>Initiating Condition: SITE AREA EMERGENCY</b></p> <p>Inability to control a key safety function from outside the Control Room.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels: (1 and 2)</b></p> <p><b>Note:</b> The Emergency Director should declare the Site Area Emergency promptly upon determining that (site-specific number of minutes) has been exceeded, or will likely be exceeded.</p> <p>1. 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>2. Control of <b>ANY</b> of the following key safety functions is not reestablished within (site-specific number of minutes).</p> <ul style="list-style-type: none"> <li>▪ Reactivity control</li> <li>▪ Core cooling [PWR] / RPV water level [BWR]</li> <li>▪ RCS heat removal</li> </ul>	<p align="right"><b>HS2</b></p> <p><b>Initiating Condition:</b></p> <p>Inability to control a key safety function from outside the Control Room.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> </ul> <p>1 A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per</p> <ul style="list-style-type: none"> <li>• SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure</li> </ul> <p><b>OR</b></p> <ul style="list-style-type: none"> <li>• SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure</li> </ul> <p><b>AND</b></p> <p>2. Control of <b>ANY</b> Table H1 key safety function is <u>not</u> reestablished in <b>&lt; 15 minutes</b>.</p> <table border="1" data-bbox="804 832 1302 1032"> <thead> <tr> <th align="center">Table H1 Safety Functions</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Reactivity Control (ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul> </td> </tr> </tbody> </table>	Table H1 Safety Functions	<ul style="list-style-type: none"> <li>• Reactivity Control (ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul>	<p 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 procedures to effectively list all of the alternate locations, panels, and stations requested by the developer notes. This would be the procedures the Control Room would enter should such an event occur, this allows for greater clarity as to when the 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>
Table H1 Safety Functions				
<ul style="list-style-type: none"> <li>• Reactivity Control (ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul>				

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HA6</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>Control Room evacuation resulting in transfer of plant control to alternate locations.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b> 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 align="right"><b>HA2</b></p> <p><b>Initiating Condition:</b></p> <p>Control Room evacuation resulting in transfer of plant control to alternate locations.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p>A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per:</p> <ul style="list-style-type: none"> <li>• SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure</li> <li><b>OR</b></li> <li>• SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure</li> </ul>	<p 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 procedures to effectively list all of the alternate locations, panels, and stations requested by the developer notes. This would be the procedures 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>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification		
<p align="right"><b>HU4</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>FIRE potentially degrading the level of safety of the plant.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels: (1 or 2 or 3 or 4)</b></p> <p><b>Note:</b> 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"> <li>1. a. A FIRE is NOT extinguished within 15-minutes of ANY of the following FIRE detection indications: <ul style="list-style-type: none"> <li>• Report from the field (i.e., visual observation)</li> <li>• Receipt of multiple (more than 1) fire alarms or indications</li> <li>• Field verification of a single fire alarm</li> </ul> <p align="center"><b>AND</b></p> </li> <li>b. The FIRE is located within ANY of the following plant rooms or areas: (site-specific list of plant rooms or areas)</li> </ol> <ol style="list-style-type: none"> <li>2. a. Receipt of a single fire alarm (i.e., no other indications of a FIRE). <b>AND</b></li> <li>b. The FIRE is located within ANY of the following plant rooms or areas: (site-specific list of plant rooms or areas) <b>AND</b></li> <li>c. The existence of a FIRE is not verified within 30-minutes of alarm receipt.</li> </ol> <ol style="list-style-type: none"> <li>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.</li> </ol> <ol style="list-style-type: none"> <li>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.</li> </ol>	<p align="right"><b>HU3</b></p> <p><b>Initiating Condition:</b></p> <p>FIRE potentially degrading the level of safety of the plant.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</li> <li>• Escalation of the emergency classification level would be via IC CA2 or MA5</li> </ul> <ol style="list-style-type: none"> <li>1. A FIRE in <b>ANY</b> Table H2 area is <u>not</u> extinguished in &lt; 15-minutes of <b>ANY</b> of the following FIRE detection indications: <ul style="list-style-type: none"> <li>• Report from the field (i.e., visual observation)</li> <li>• Receipt of multiple (more than 1) fire alarms or indications</li> <li>• Field verification of a single fire alarm</li> </ul> <table border="1" data-bbox="814 794 1306 1004" style="margin-left: 40px;"> <thead> <tr> <th align="center">Table H2 Vital Areas</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Reactor Building (when inerted the Drywell is exempt)</li> <li>• Control Room</li> <li>• Diesel Generator Building</li> <li>• Emergency Pump Structure</li> <li>• Inner Screen Structure</li> <li>• Emergency Cooling Tower</li> <li>• Emergency Switchgear/Battery Rooms</li> <li>• Cable Spread Room</li> </ul> </td> </tr> </tbody> </table> </li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>2. a. Receipt of a single fire alarm in <b>ANY</b> Table H2 area (i.e., no other indications of a FIRE). <b>AND</b></li> <li>b. The existence of a FIRE is <u>not</u> verified in &lt; 30 minutes of alarm receipt. <b>OR</b></li> </ol> <ol style="list-style-type: none"> <li>3. A FIRE within the plant PROTECTED AREA or ISFSI PROTECTED AREA <u>not</u> extinguished in &lt; 60-minutes of the initial report, alarm or indication. <b>OR</b></li> </ol> <ol style="list-style-type: none"> <li>4. A FIRE within the plant PROTECTED AREA or ISFSI PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish.</li> </ol>	Table H2 Vital Areas	<ul style="list-style-type: none"> <li>• Reactor Building (when inerted the Drywell is exempt)</li> <li>• Control Room</li> <li>• Diesel Generator Building</li> <li>• Emergency Pump Structure</li> <li>• Inner Screen Structure</li> <li>• Emergency Cooling Tower</li> <li>• Emergency Switchgear/Battery Rooms</li> <li>• Cable Spread Room</li> </ul>	<p align="center"> <input type="checkbox"/> No Change    <input checked="" type="checkbox"/> Difference    <input type="checkbox"/> Deviation </p> <ol style="list-style-type: none"> <li>1) Listed site-specific list of plant rooms or areas that contain SAFETY SYSTEM equipment to ensure timely classification.</li> <li>2) Added additional note to easily direct the operator to escalation ICs</li> </ol>
Table H2 Vital Areas				
<ul style="list-style-type: none"> <li>• Reactor Building (when inerted the Drywell is exempt)</li> <li>• Control Room</li> <li>• Diesel Generator Building</li> <li>• Emergency Pump Structure</li> <li>• Inner Screen Structure</li> <li>• Emergency Cooling Tower</li> <li>• Emergency Switchgear/Battery Rooms</li> <li>• Cable Spread Room</li> </ul>				

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HU2</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>Seismic event greater than OBE levels.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></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 align="right"><b>HU4</b></p> <p><b>Initiating Condition:</b></p> <p>Seismic event greater than OBE levels.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p>Note: Escalation of the emergency classification level would be via IC CA2 or MA5</p> <p>For emergency classification if EAL 2.b is not able to be confirmed, then the occurrence of a seismic event is confirmed in manner deemed appropriate by the Shift Manager or Emergency Director in <b>≤ 15 mins</b> of the event.</p> <p>1. Seismic event <b>&gt; Operating Basis Earthquake (OBE)</b> as indicated by the Alarm on Panel 316 A-5."OPERATING BASIS EARTHQUAKE EXCEEDED"</p> <p><b>OR</b></p> <p>2. When Seismic Monitoring Equipment is <b>not</b> available:</p> <p>a. Control Room personnel feel an actual or potential seismic event.</p> <p><b>AND</b></p> <p>b. <b>ANY</b> one of the following confirmed in <b>≤ 15 mins</b> of the event:</p> <ul style="list-style-type: none"> <li>• The earthquake resulted in Modified Mercalli Intensity (MMI) <b>≥ VI</b> and occurred <b>≤ 3.5 miles</b> of the plant.</li> <li>• The earthquake was magnitude <b>≥ 6.0</b></li> <li>• The earthquake was magnitude <b>≥ 5.0</b> and occurred <b>≤ 125 miles</b> of the plant.</li> </ul>	<p align="center"> <input type="checkbox"/> No Change    <input checked="" type="checkbox"/> Difference    <input type="checkbox"/> Deviation </p> <p>1) Listed site-specific indications.</p> <p>2) 316 A-5 is an alarm panel in the Main Control Room. The seismic panel is located in the Cable Spread Room. (Located beneath the MCR) When the alarm 316 A-5 "OPERATING BASIS EARTHQUAKE EXCEEDED" alarms the response has an Operator go to the seismic panel and check indications to verify alarms are not due to loss of power. If both the "Event" and "OBE" lights are lit, that would indicate a &gt; OBE event occurred. It would take &lt; 10 minutes to dispatch an EO or an extra RO with the procedure and have them provide this information to the MCR.</p> <p>3) Developed a compensatory EAL for use during periods when the seismic monitoring system capable of detecting an OBE is out of service for maintenance or repair using the guidance in the developer notes provided.</p> <p>4) Added additional compensatory thresholds based on the guidance provided in US NRC Reg. Guide 1.166, Pre-Earthquake Planning and Immediate Nuclear Power Plant Operator Earthquake Actions Appendix A, also added a 15 min time limit to ensure timely classification when these additional thresholds may not be readily available.</p> <p>5) Added additional notes to easily direct the operator to the escalation ICs, as well as to ensure if unable to determine size of earthquake IAW 2.b then the SM / ED will determine classification within 15 mins of the event</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification									
<p align="right"><b>HA5</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></p> <p><b>Note:</b> 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><b>AND</b></p> <p>b. Entry into the room or area is prohibited or impeded.</p>	<p align="right"><b>HA5</b></p> <p><b>Initiating Condition:</b></p> <p>Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>1. Release of a toxic, corrosive, asphyxiant or flammable gas in a Table H3 area.</p> <table border="1" data-bbox="800 745 1293 913"> <thead> <tr> <th align="center" colspan="2"><b>Table H3 Areas with Entry Related Mode Applicability</b></th> </tr> <tr> <th align="center"><b>Area of concern</b></th> <th align="center"><b>Entry Related Mode Applicability</b></th> </tr> </thead> <tbody> <tr> <td align="center"><b>Reactor Building</b></td> <td align="center" rowspan="2">Modes 3, 4 and 5</td> </tr> <tr> <td align="center">135' all areas</td> </tr> <tr> <td align="center"><b>Control Room</b></td> <td align="center">Modes 1, 2, 3, 4, and 5</td> </tr> </tbody> </table> <p><b>AND</b></p> <p>2. Entry into the room or area is prohibited or impeded.</p>	<b>Table H3 Areas with Entry Related Mode Applicability</b>		<b>Area of concern</b>	<b>Entry Related Mode Applicability</b>	<b>Reactor Building</b>	Modes 3, 4 and 5	135' all areas	<b>Control Room</b>	Modes 1, 2, 3, 4, and 5	<p> <input type="checkbox"/> No Change    <input checked="" 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> <p>2) The Operating Mode Applicability of this EAL has been revised from All Modes to modes 1, 2, 3, 4, and 5 due to the mode applicability of the areas of concern in Table H-3.</p>
<b>Table H3 Areas with Entry Related Mode Applicability</b>											
<b>Area of concern</b>	<b>Entry Related Mode Applicability</b>										
<b>Reactor Building</b>	Modes 3, 4 and 5										
135' all areas											
<b>Control Room</b>	Modes 1, 2, 3, 4, and 5										

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HU3</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>Hazardous Event</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels: (1 or 2 or 3 or 4)</b></p> <p><b>Note:</b> EAL #3 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.</p> <ol style="list-style-type: none"> <li>1. A tornado strike within the PROTECTED AREA.</li> <li>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.</li> <li>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).</li> <li>4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles.</li> <li>5. (Site-specific list of natural or technological hazard events)</li> </ol>	<p align="right"><b>HU6</b></p> <p><b>Initiating Condition:</b></p> <p>Hazardous Event</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.</li> <li>• Escalation of the emergency classification level would be via IC CA2 or MA5</li> </ul> <ol style="list-style-type: none"> <li>1. Tornado strike within the PROTECTED AREA.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>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.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>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).</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles.</li> </ol> <p align="center"><b>OR</b></p> <ol style="list-style-type: none"> <li>5. Abnormal River level, as indicated by <b>EITHER</b>: <ul style="list-style-type: none"> <li>• &gt; 112 ft. (high level)</li> </ul> </li> </ol> <p align="center"><b>OR</b></p> <ul style="list-style-type: none"> <li>• &lt; 98.5 ft. (low level)</li> </ul>	<p align="center"> <input type="checkbox"/> No Change    <input checked="" type="checkbox"/> Difference    <input type="checkbox"/> Deviation </p> <p>1) Included river water level as part of the site-specific list of natural or technological hazard events. The EAL values selected are the current Approved UE EAL values.</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> <p>3) Added additional note to easily direct the operator to escalation ICs</p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HG7</b></p> <p><b>Initiating Condition: GENERAL EMERGENCY</b></p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b> 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 align="right"><b>HG7</b></p> <p><b>Initiating Condition:</b></p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b> 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 align="center"> <input checked="" type="checkbox"/> No Change                      <input type="checkbox"/> Difference                      <input type="checkbox"/> Deviation             </p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HS7</b></p> <p><b>Initiating Condition: SITE AREA EMERGENCY</b></p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></p> <p>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 align="right"><b>HS7</b></p> <p><b>Initiating Condition:</b></p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p>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 align="center"> <input checked="" type="checkbox"/> No Change               <input type="checkbox"/> Difference               <input type="checkbox"/> Deviation         </p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HA6</b></p> <p><b>Initiating Condition: ALERT</b></p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></p> <p>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 align="right"><b>HA7</b></p> <p><b>Initiating Condition:</b></p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p>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 align="center"> <input checked="" type="checkbox"/> No Change               <input type="checkbox"/> Difference               <input type="checkbox"/> Deviation         </p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>HU7</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>Other conditions existing which in the judgment of the Emergency director warrant declaration of an UNUSUAL EVENT.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></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 align="right"><b>HU7</b></p> <p><b>Initiating Condition:</b></p> <p>Other conditions existing which in the judgment of the Emergency director warrant declaration of an UNUSUAL EVENT.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></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 align="center"> <input checked="" type="checkbox"/> No Change               <input type="checkbox"/> Difference               <input type="checkbox"/> Deviation         </p>

**EAL Comparison Matrix Document**

NEI 99-01 Rev 6	Proposed EAL	Justification
<p align="right"><b>E-HU1</b></p> <p><b>Initiating Condition: UNUSUAL EVENT</b></p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY.</p> <p><b>Operating Mode Applicability:</b></p> <p>All</p> <p><b>Example Emergency Action Levels:</b></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 align="right"><b>E-HU1</b></p> <p><b>Initiating Condition:</b></p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY.</p> <p><b>Operating Mode Applicability:</b></p> <p>1, 2, 3, 4, 5, D</p> <p><b>Emergency Action Level (EAL):</b></p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading:</p> <ul style="list-style-type: none"> <li>• &gt; 350 mr/hr gamma and 30 mr/hr neutron on the top (protective cover).</li> <li align="center">OR</li> <li>• &gt; 250 mr/hr gamma and 60 mr/hr neutron on the sides of the radial neutron shield.</li> <li align="center">OR</li> <li>• &gt; 1100 mr/hr gamma and 250 mr/hr neutron on the side surfaces of the cask above the radial neutron shield.</li> <li align="center">OR</li> <li>• &gt; 800 mr/hr gamma and 600 mr/hr neutron on the side surfaces of the cask below the radial neutron shield.</li> </ul>	<p align="center"> <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 Certificate of Compliance No. 1014 Appendix A Section 5.7.</p>

**EAL Comparison Matrix Document**

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RG1****Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 1000 mRem TEDE or 5000 mRem thyroid CDE.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
- 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. Readings on **ANY** Table R1 Effluent Monitor > **Table R1 value** for **≥ 15 minutes**.

**OR**

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

a. > **1000 mRem TEDE**

**OR**

b. > **5000 mRem CDE Thyroid**

**OR**

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.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RG1 (cont)**

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>General Emergency</b>
<b>Main Stack (RI-0-17-050B Common)</b>	5.57 E+09 uCi/sec
<b>Vent Stack (RI-2979B Unit 2 or RI-3979B Unit 3)</b>	1.60 E+08 uCi/sec

**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 mRem while the 5000 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AG1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station
4. EP-AA-112-500, Emergency Environmental Monitoring

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RS1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
- 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. Readings on **ANY** Table R1 Effluent Monitor > **Table R1 value** for **≥ 15 minutes**.

**OR**

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

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

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RS1 (cont)**

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>Site Area Emergency</b>
<b>Main Stack</b> (RI-0-17-050B Common)	5.57 E+08 uCi/sec
<b>Vent Stack</b> (RI-2979B Unit 2 or RI-3979B Unit 3)	1.60 E+07 uCi/sec

**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 mRem while the 500 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Escalation of the emergency classification level would be via IC RG1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AS1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station
4. EP-AA-112-500, Emergency Environmental Monitoring

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
- 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. Readings on **ANY** Table R1 Effluent Monitor > **Table R1 value** for **≥ 15 minutes**.

**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 **EITHER** of the following at or beyond the site boundary

a. **10 mRem TEDE** for **60 minutes** of exposure

**OR**

b. **50 mRem CDE Thyroid** for **60 minutes** of exposure

**OR**

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA1 (cont)**

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

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>Alert</b>
<b>Main Stack (RI-0-17-050B Common)</b>	5.57 E+07 uCi/sec
<b>Vent Stack (RI-2979B Unit 2 or RI-3979B Unit 3)</b>	1.60 E+06 uCi/sec

**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 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 mRem while the 50 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Escalation of the emergency classification level would be via IC RU1

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AA1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station
4. EP-EAL-0614Revision 0 Peach Bottom Criteria for Choosing Radiological Liquid Effluent EAL Threshold Values

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU1**

**Initiating Condition:**

Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
- 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** of the following effluent monitors **> 2 times alarm setpoint** established by a current radioactive release discharge permit for **≥ 60 minutes**.

- Radwaste Discharge Effluent Monitor (RI-0-17-350)

**OR**

- Discharge Permit specified monitor

**OR**

2. Readings on **ANY** Table R1 Effluent Monitor **> Table R1 value** for **≥ 60 minutes**:

**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**.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU1 (cont)**

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>Unusual Event</b>
<b>Main Stack</b> (RI-0-17-050B Common)	6.36 E+05 uCi/sec
<b>Main Stack</b> (RI-0-17-050A Common)	6.36 E+05 uCi/sec
<b>Vent Stack</b> (RI-2979B Unit 2 or RI-3979B Unit 3)	1.82 E+04 uCi/sec
<b>Vent Stack</b> (RI-2979A Unit 2 or RI-3979A Unit 3)	1.82 E+04 uCi/sec

**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.

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**

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).

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU1 (cont)**

**Basis (cont):**

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 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**

This EAL addresses normally occurring continuous radioactivity releases from monitored gaseous effluent pathways.

**EAL #3 Basis**

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 RA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AU1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RG2**

**Initiating Condition:**

Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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

Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for **60 minutes** or longer.

**Basis:**

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to a prolonged uncover of spent fuel. This condition will lead to fuel damage and a radiological release to the environment.

It is recognized that this IC would likely not be met until well after another General Emergency IC was met; however, it is included to provide classification diversity.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AG2

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RS2**

**Initiating Condition:**

Spent fuel pool level at (site-specific Level 3 description).

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

Lowering of spent fuel pool level to (site-specific Level 3 value).

**Basis:**

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to IMMEDIATE fuel damage. This condition entails major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

It is recognized that this IC would likely not be met until well after another Site Area Emergency IC was met; however, it is included to provide classification diversity.

Escalation of the emergency classification level would be via IC RG1 or RG2.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AS2

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA2**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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 R2 Radiation Monitor reading **>1000 mRem/hr.**  
**OR**
3. Lowering of spent fuel pool level to (site specific Level 2 value).

<b>Table R2 Refuel Floor ARM's</b>
<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>

**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. 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.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA2 (cont)**

**Basis (cont):**

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.

**EAL #1 Basis**

This EAL escalates from RU2 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. If available, video cameras may allow remote observation. 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 a 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.

**EAL #2 Basis**

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).

**EAL #3 Basis:**

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 would be based on either Recognition Category R or C ICs.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA2 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AA2
2. ON-124, Fuel Floor and Fuel Handling Problems
3. P-S-43, Radiation Monitoring System
4. ARC 003-00C214 B-4, Refueling Floor Area Hi Radiation
5. ARC 20C075 C-1, Fuel Storage Pool Hi Radiation

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU2**

**Initiating Condition:**

UNPLANNED loss of water level above irradiated fuel.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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

- Refueling Cavity water level < **458 inches** on Shutdown/Refuel Range indicator LI-2(3)-2-3-86 or PR/FR-2(3)-06-097.

**OR**

- Spent Fuel Pool level < **232 feet 3 inches** plant elevation.

**OR**

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

**AND**

b. UNPLANNED Area Radiation Monitor reading rise on one or more radiation monitors in Table R2.

<b>Table R2 Refuel Floor ARM's</b>
<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU2 (cont)**

**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.

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 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 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 a rise 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 rise 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 RA2.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AU2
2. Technical Specifications 3.9.6, Reactor Pressure Vessel (RPV) Water Level
3. ON-124, Fuel Floor and Fuel Handling Problems
4. P-S-43, Radiation Monitoring System
5. ARC 003-00C214 B-4, Refueling Floor Area Hi Radiation
6. ARC 20C075 C-1, Fuel Storage Pool Hi Radiation
7. GP-6, Refueling Operations

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA3**

**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, D

**Emergency Action Level (EAL):**

**Note:**

- If the equipment in the room or area listed in Table R4 was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.
- Dose rate > 15 mR/hr in **ANY** of the following Table R3 areas:

Table R3 Areas Requiring Continuous Occupancy
<ul style="list-style-type: none"> <li>• Main Control Room</li> <li>• Central Alarm Station – (by survey)</li> </ul>

**OR**

- UNPLANNED event results in radiation levels that prohibit or significantly impede access to **ANY** of the following Table R4 plant rooms or areas:

Table R4 Areas with Entry Related Mode Applicability	
Area of concern	Entry Related Mode Applicability
<b>Reactor Building</b>	Modes 3, 4 and 5
135' all areas	

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA3 (cont)**

**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. 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 raised radiation levels and determine if another IC may be applicable.

Assuming all plant equipment is operating as designed, normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table R4 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. 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 procedures, requiring use of non-routine protective equipment, requesting an 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 rise occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA3 (cont)**

**Basis (cont):**

- 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 R, C or F ICs.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AA3
2. FSAR Section describing Class I structures
3. Appendix R Analysis defining Safe Shutdown Area
4. P-S-43, Radiation Monitoring System
5. T-300, Fire Guides
6. SO 10.1.B-2(3), "Residual Heat Removal System Shutdown Cooling Mode Manual Start"

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU3****Initiating Condition:**

Reactor coolant activity greater than Technical Specification allowable limits.

**Operating Mode Applicability:**

1, 2, 3

**Emergency Action Level (EAL):**

1. Air Ejector discharge radiation monitor RIS-2(3)-17-150 A/B **Hi-Hi** alarm.

**OR**

2. Specific coolant activity > **4.0 uCi/gm** Dose equivalent I-131.

**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 R ICs.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU3
2. Technical Specifications 3.4.6, RCS Specific Activity
3. Technical Specifications 3.7.5, Main Condenser Offgas
4. DBD P-S-30, Offgas System
5. ARC 218 20C210 E-1, Air Ejector Discharge Radiation High-High

**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

**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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FS1**

**Initiating Condition:**

Loss or Potential Loss of ANY two barriers.

**Operating Mode Applicability:**

1, 2, 3

**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-2

**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

**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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC1****Initiating Condition:**

RCS Activity

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSSCoolant activity > **300 uCi/gm** Dose Equivalent I-131.**Basis:**

This threshold indicates that RCS radioactivity concentration is greater than 300  $\mu\text{Ci/gm}$  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.

There is no Potential Loss threshold associated with RCS Activity.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC2****Initiating Condition:**

RPV Water Level

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. Plant conditions indicate Primary Containment flooding is required.

POTENTIAL LOSS

2. RPV water level **cannot** be restored and maintained **> -172 inches** (TAF).

**OR**

- RPV water level **cannot** be determined.

**Basis:****Loss Threshold #1 Basis**

The Loss threshold represents the EOP requirement for primary containment flooding. This is identified in the BWROG EOPs/SAMPs when the phrase, "Primary Containment Flooding Is Required," appears. Since a site-specific RPV water level is not specified here, the Loss threshold phrase, "Primary containment flooding required," also accommodates the EOP need to flood the primary containment when RPV water level cannot be determined and core damage due to inadequate core cooling is believed to be occurring.

**Potential Loss Threshold #2 and #3 Basis**

This water level corresponds to the top of the active fuel and is used in the EOPs to indicate a challenge to core cooling.

The RPV water level threshold is the same as RCS Barrier RC2 Loss threshold. Thus, this threshold indicates a Potential Loss of the Fuel Clad barrier and a Loss of the RCS barrier that appropriately escalates the emergency classification level to a Site Area Emergency.

This threshold is considered to be exceeded when, as specified in the site-specific EOPs, RPV water level cannot be restored and maintained above the specified level following depressurization of the RPV (either manually, automatically or by failure of the RCS barrier) or when procedural guidance or a lack of low pressure RPV injection sources preclude Emergency RPV depressurization. EOPs allow the operator a wide choice of RPV injection sources to consider when restoring RPV water level to within prescribed limits. EOPs also specify depressurization of the RPV in order to facilitate

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC2 (cont)**

**Basis (cont):**

RPV water level control with low-pressure injection sources. In some events, elevated RPV pressure may prevent restoration of RPV water level until pressure drops below the shutoff heads of available injection sources. Therefore, this Fuel Clad barrier Potential Loss is met only after either: 1) the RPV has been depressurized, or required emergency RPV depressurization has been attempted, giving the operator an opportunity to assess the capability of low-pressure injection sources to restore RPV water level or 2) no low pressure RPV injection systems are available, precluding RPV depressurization in an attempt to minimize loss of RPV inventory.

The term "cannot be restored and maintained above" means the value of RPV water level is not able to be brought above the specified limit (top of active fuel). The determination requires an evaluation of system performance and availability in relation to the RPV water level value and trend. A threshold prescribing declaration when a threshold value *cannot* be restored and maintained above a specified limit does not require immediate action simply because the current value is below the top of active fuel, but does not permit extended operation below the limit; the threshold must be considered reached as soon as it is apparent that the top of active fuel cannot be attained

Entry into the "Steam Cooling" leg of the EOP's would be an example of an inability to "restore and maintain" level above TAF resulting in this threshold being met.

In high-power ATWS/failure to scram events, EOPs may direct the operator to deliberately lower RPV water level in order to reduce reactor power. Although such action is a challenge to core cooling and the Fuel Clad barrier, the immediate need to reduce reactor power is the higher priority. For such events, ICs MA3 or MS3 will dictate the need for emergency classification.

Since the loss of ability to determine if adequate core cooling is being provided presents a significant challenge to the fuel clad barrier, a potential loss of the fuel clad barrier is specified.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-BAS INTRO, INTRODUCTION TO TRIPS AND SAMPS – BASES
3. T-101, RPV Control Bases
4. T-111, Level Restoration

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC5****Initiating Condition:**

Primary Containment Radiation

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

Drywell radiation monitor reading &gt; 9.55 E+02 R/hr.

**Basis:**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the primary containment, assuming that reactor coolant activity equals 300  $\mu\text{Ci/gm}$  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 RC5 Loss Threshold 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.

There is no Fuel Clad Barrier Potential Loss threshold associated with Primary Containment Radiation.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. Core Damage Assessment Methodology
3. ARC-005-00C226D-B-5, Unit 3 Containment Radiation Monitor Hi-Rad
4. DBD P-S-43, Radiation Monitoring System

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC7**

**Initiating Condition:**

Emergency Director Judgment.

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**

LOSS

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

POTENTIAL LOSS

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

**Basis:**

**Loss Threshold #1 Basis**

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

**Potential Loss Threshold #2 Basis**

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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC2**

**Initiating Condition:**

RPV Water Level

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. RPV water level **cannot** be restored and maintained > **-172 inches** (TAF).

**OR**

2. RPV water level **cannot** be determined.

**Basis:**

This water level corresponds to the Top of Active Fuel (TAF) and is used in the EOPs to indicate challenge to core cooling.

The RPV water level threshold is the same as Fuel Clad Barrier FC2 Potential Loss threshold. Thus, this threshold indicates a Loss of the RCS barrier and Potential Loss of the Fuel Clad barrier and that appropriately escalates the emergency classification level to a Site Area Emergency.

This threshold is considered to be exceeded when, as specified in the site-specific EOPs, RPV water level cannot be restored and maintained above the specified level following depressurization of the RPV (either manually, automatically or by failure of the RCS barrier) or when procedural guidance or a lack of low pressure RPV injection sources preclude Emergency RPV depressurization. EOPs allow the operator a wide choice of RPV injection sources to consider when restoring RPV water level to within prescribed limits. EOPs also specify depressurization of the RPV in order to facilitate RPV water level control with low-pressure injection sources. In some events, elevated RPV pressure may prevent restoration of RPV water level until pressure drops below the shutoff heads of available injection sources. Therefore, this RCS barrier Loss is met only after either: 1) the RPV has been depressurized, or required emergency RPV depressurization has been attempted, giving the operator an opportunity to assess the capability of low-pressure injection sources to restore RPV water level or 2) no low pressure RPV injection systems are available, precluding RPV depressurization in an attempt to minimize loss of RPV inventory.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC2 (cont)**

**Basis (cont):**

The term, "cannot be restored and maintained above," means the value of RPV water level is not able to be brought above the specified limit (top of active fuel). The determination requires an evaluation of system performance and availability in relation to the RPV water level value and trend. A threshold prescribing declaration when a threshold value *cannot* be restored and maintained above a specified limit does not require immediate action simply because the current value is below the top of active fuel, but does not permit extended operation beyond the limit; the threshold must be considered reached as soon as it is apparent that the top of active fuel cannot be attained.

Entry into the "Steam Cooling" leg of the EOP's would be an example of an inability to "restore and maintain" level above TAF resulting in this threshold being met.

In high-power ATWS/failure to scram events, EOPs may direct the operator to deliberately lower RPV water level in order to reduce reactor power. Although such action is a challenge to core cooling and the Fuel Clad barrier, the immediate need to reduce reactor power is the higher priority. For such events, ICs MA3 or MS3 will dictate the need for emergency classification.

There is no RCS Potential Loss threshold associated with RPV Water Level.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-BAS INTRO, INTRODUCTION TO TRIPS AND SAMPS – BASES
3. T-101, RPV Control Bases
4. T-111, Level Restoration

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

Primary Containment Pressure

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. Drywell pressure &gt;2.0 psig.

**AND**

2. Drywell pressure rise is due to RCS leakage

**Basis:**

The > 2.0 psig primary containment pressure is the Drywell high pressure setpoint which indicates a LOCA by automatically initiating ECCS.

The second threshold condition focuses the fission product barrier loss threshold on a failure of the RCS instead of the non-LOCA malfunctions that may adversely affect primary containment pressure. Pressures of this magnitude can be caused by non-LOCA events such as a loss of Drywell cooling or inability to control primary containment vent/purge.

The release of mass from the RCS due to the as-designed/expected operation of any relief valve does not warrant an emergency classification.

A stuck-open Safety Relief Valve (SRV) or SRV leakage is not considered either identified or unidentified leakage by Technical Specifications and, therefore, is not applicable to this EAL.

There is no Potential Loss threshold associated with Primary Containment Pressure.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-102, Primary Containment Control-Bases
3. T-101, RPV Control

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC4**

**Initiating Condition:**

RCS Leak Rate

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. UNISOLABLE Main Steam Line (MSL), HPCI, Feedwater, RWCU, or RCIC line break.

**OR**

2. Emergency RPV Depressurization is required.

POTENTIAL LOSS3. UNISOLABLE primary system leakage that results in **EITHER** of the following:a. Secondary Containment area temperature > **T-103 Alarm Setpoint.****OR**b. Secondary Containment radiation level > **T-103 Alarm Setpoint.****Basis:**

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

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

Classification of a system break over system leakage is based on information available to the Control Room from the event. Indications that should be considered are:

- Reports describing magnitude of steam or water release.
- Use of system high flow alarms / indications, if available,
- Significant changes in makeup requirements,
- Abnormal reactor water level changes in response to the event.

The use of the above indications provides the Control Room the bases to determine that the on going event is more significant than the indications that would be expected from system leakage and therefore should be considered a system break.

**Loss Threshold #1 Basis**

Large high-energy lines that rupture outside primary containment can discharge significant amounts of inventory and jeopardize the pressure-retaining capability of the RCS until they are isolated. If it is determined that the ruptured line cannot be promptly isolated, the RCS barrier Loss threshold is met.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC4 (cont)****Basis (cont):****Loss Threshold #2 Basis**

Emergency RPV Depressurization in accordance with the EOPs is indicative of a loss of the RCS barrier. If Emergency RPV Depressurization is performed, the plant operators are directed to open safety relief valves (SRVs) and keep them open. Even though the RCS is being vented into the torus, a Loss of the RCS barrier exists due to the diminished effectiveness of the RCS to retain fission products within its boundary.

**Potential Loss Threshold #3 Basis**

Potential loss of RCS based on primary system leakage outside the primary containment is determined from EOP temperature or radiation Max Normal Operating values in areas such as main steam line tunnel, RCIC, HPCI, etc., which indicate a direct path from the RCS to areas outside primary containment.

A Max Normal Operating value is the highest value of the identified parameter expected to occur during normal plant operating conditions with all directly associated support and control systems functioning properly.

The indicators reaching the threshold barriers and confirmed to be caused by RCS leakage from a primary system warrant an Alert classification. A primary system is defined to be the pipes, valves, and other equipment which connect directly to the RPV such that a reduction in RPV pressure will effect a decrease in the steam or water being discharged through an unisolated break in the system.

In general, multiple indications should be used to determine if a primary system is discharging outside Primary Containment. For example, a high area radiation condition does not necessarily indicate that a primary system is discharging into the Reactor Building since this may be caused by radiation shine from nearby steam lines or the movement of radioactive materials. Conversely, a high area radiation condition in conjunction with other indications (e.g. room flooding, high area temperatures, reports of steam in the Reactor Building, an unexpected rise in Feedwater flowrate, or unexpected Main Turbine Control Valve closure) may indicate that a primary system is discharging into the Reactor Building.

An UNISOLABLE leak which is indicated by Max Normal Operating values escalates to a Site Area Emergency when combined with Containment Barrier CT6 Loss Threshold #1 (after a containment isolation) and a General Emergency when the Fuel Clad Barrier criteria is also exceeded.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-103, Secondary Containment Control

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC5**

**Initiating Condition:**

Primary Containment radiation

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**

LOSS

Drywell radiation monitor reading > **100R/hr.**

**Basis:**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the primary containment, assuming that reactor coolant activity equals Technical Specification allowable limits. This value is lower than that specified for Fuel Clad Barrier FC5 Loss Threshold since it indicates a loss of the RCS Barrier only.

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

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. EP-EAL-0611, Criteria for Choosing Containment Radiation Monitor Reading Indicative of Loss of RCS Barrier

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC7**

**Initiating Condition:**

Emergency Director Judgment.

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**

LOSS

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

POTENTIAL LOSS

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

**Basis:**

**Loss Threshold #1 Basis**

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

**Potential Loss Threshold #2 Basis**

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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION****CT2****Initiating Condition:**

RPV Water Level

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:****POTENTIAL LOSS**

Plant conditions indicate Primary Containment flooding is required.

**Basis:**

The Potential Loss threshold is identical to the Fuel Clad Barrier FC2 Loss threshold RPV Water Level. The Potential Loss requirement for Primary Containment Flooding indicates adequate core cooling cannot be restored and maintained and that core damage is possible. BWR EOPs/SAMPs specify the conditions that require primary containment flooding. When primary containment flooding is required, the EOPs are exited and SAMPs are entered. Entry into SAMPs is a logical escalation in response to the inability to restore and maintain adequate core cooling.

PRA studies indicate that the condition of this Potential Loss threshold could be a core melt sequence which, if not corrected, could lead to RPV failure and increased potential for primary containment failure. In conjunction with the RPV water level Loss thresholds in the Fuel Clad and RCS barrier columns, this threshold results in the declaration of a General Emergency.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-111, Level Restoration (LR)- Bases
3. T-116, RPV Flooding - Bases
4. T-117, Level/Power Control – Bases
5. TRIP/SAMP Curves, Tables, And Limits – Bases
6. T-BAS (INTRO), Introduction To Trips And Samps - Bases

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT3**

**Initiating Condition:**

Primary Containment Conditions

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. UNPLANNED rapid drop in Drywell pressure following primary containment pressure rise.

**OR**

2. Drywell pressure response **not** consistent with LOCA conditions.

POTENTIAL LOSS

3. Drywell pressure > **56 psig** and rising.

**OR**

4. a. Drywell or Torus Hydrogen concentration > **6%**.

**AND**

b. Drywell or Torus Oxygen concentration > **5%**.

**OR**

5. Heat Capacity Limit (T-102 Curve T/T-1) exceeded.

**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.

**Loss Threshold #1 and #2 Basis**

Rapid UNPLANNED loss of primary containment pressure (i.e., not attributable to Drywell spray or condensation effects) following an initial pressure rise indicates a loss of primary containment integrity. Primary containment pressure should rise as a result of mass and energy release into the primary containment from a LOCA. Thus, primary containment pressure not increasing under these conditions indicates a loss of primary containment integrity.

These thresholds rely on operator recognition of an unexpected response for the condition and therefore a specific value is not assigned. The unexpected (UNPLANNED) response is important because it is the indicator for a containment bypass condition. A pressure suppression bypass path would **not** be an indication of a containment breach.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT3 (cont)**

**Basis (cont):**

**Potential Loss Threshold #3 Basis**

The threshold pressure is the primary containment internal design pressure. Structural acceptance testing demonstrates the capability of the primary containment to resist pressures greater than the internal design pressure. A pressure of this magnitude is greater than those expected to result from any design basis accident and, thus, represent a Potential Loss of the Containment barrier.

**Potential Loss Threshold #4 Basis**

If hydrogen concentration reaches or exceeds the lower flammability limit, as defined in plant EOPs, in an oxygen rich environment, a potentially explosive mixture exists. If the combustible mixture ignites inside the primary containment, loss of the Containment barrier could occur.

**Potential Loss Threshold #5 Basis**

The HCTL is a function of RPV pressure, torus temperature and torus water level. It is utilized to preclude failure of the containment and equipment in the containment necessary for the safe shutdown of the plant and therefore, the inability to maintain plant parameters below the limit constitutes a potential loss of containment.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-BAS INTRO, INTRODUCTION TO TRIPS AND SAMPS – BASES
3. UFSAR Section 5.2.4, Primary Containment Safety Evaluation
4. T-102 Primary Containment Control-Bases
5. DBD P-T-12, Design Basis Accidents, Transients and Events
6. DBD P-T-02, Containment, Section 3.2.14

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT5****Initiating Condition:**

Primary Containment Radiation

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSSDrywell radiation monitor reading > **2.20 E+03 R/hr.****Basis:**

There is no Loss threshold associated with Primary Containment Radiation.

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the primary 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-2
2. Core Damage Assessment Methodology
3. ARC-005-00C226D-B-5 Unit 3 Containment Radiation Monitor Hi-Rad
4. DBD P-S-43, Radiation Monitoring System

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT6**

**Initiating Condition:**

Primary Containment Isolation Failure

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal.

**OR**

2. Intentional Primary Containment venting/purging per EOPs or SAMPs due to accident conditions.

**OR**

3. UNISOLABLE primary system leakage that results in **EITHER** of the following:

a. Secondary Containment area temperature > **T-103 Action Level**.

**OR**

b. Secondary Containment area radiation level > **T-103 Action Level**.

**Basis:**

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

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

These thresholds address incomplete containment isolation that allows an UNISOLABLE direct release to the environment.

**Loss Threshold #1 Basis**

The use of the modifier "direct" in defining the release path discriminates against release paths through interfacing liquid systems or minor release pathways, such as instrument lines, not protected by the Primary Containment Isolation System (PCIS). Leakage into a closed system is to be considered only if the closed system is breached and thereby creates a significant pathway to the environment. Examples include unisolable Main Steamline, HPCI or RCIC steamline breaks, unisolable RWCU system breaks, and unisolable containment atmosphere vent paths.

Examples of "downstream pathway to the environment" could be through the Turbine/Condenser, or direct release to the Turbine or Reactor Building.

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

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT6 (cont)**

**Basis (cont):**

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.

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

**Loss Threshold #2 Basis**

EOPs may direct primary containment isolation valve logic(s) to be intentionally bypassed, even if offsite radioactivity release rate limits will be exceeded. Under these conditions with a valid primary containment isolation signal, the containment should also be considered lost if primary containment venting is actually performed.

Intentional venting of primary containment for primary containment pressure or combustible gas control to the secondary containment and/or the environment is a Loss of the Containment. Venting for primary containment pressure control when not in an accident situation (e.g., to control pressure below the Drywell high pressure scram setpoint) does not meet the threshold condition.

**Loss Threshold #3 Basis**

The Max Safe Operating Temperature and the Max Safe Operating Radiation Level are each the highest value of these parameters at which neither: (1) equipment necessary for the safe shutdown of the plant will fail, nor (2) personnel access necessary for the safe shutdown of the plant will be precluded. EOPs utilize these temperatures and radiation levels to establish conditions under which RPV depressurization is required.

The temperatures and radiation levels should be confirmed to be caused by RCS leakage from a primary system. A primary system is defined to be the pipes, valves, and other equipment which connect directly to the RPV such that a reduction in RPV pressure will effect a decrease in the steam or water being discharged through an unisolated break in the system.

In general, multiple indications should be used to determine if a primary system is discharging outside Primary Containment. For example, a high area radiation condition does not necessarily indicate that a primary system is discharging into the Reactor Building since this may be caused by radiation shine from nearby steam lines or the movement of radioactive materials. Conversely, a high area radiation condition in conjunction with other indications (e.g. room flooding, high area temperatures, reports of steam in the Reactor Building, an unexpected rise in Feedwater flowrate, or unexpected Main Turbine Control Valve closure) may indicate that a primary system is discharging into the Reactor Building.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT6 (cont)**

**Basis (cont):**

In combination with RCS Barrier RC4 Potential Loss Threshold #3 this threshold would result in a Site Area Emergency.

There is no Potential Loss threshold associated with Primary Containment Isolation Failure.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-103 Secondary Containment Control
3. T-102 Primary Containment Control
4. T-200-3 Primary Containment Venting

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT7**

**Initiating Condition:**

Emergency Director Judgment.

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**

LOSS

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

POTENTIAL LOSS

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

**Basis:**

**Loss Threshold #1 Basis**

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

**Potential Loss Threshold #2 Basis**

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-2

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MG1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

1 Loss of **ALL** offsite AC power to unit 4 KV Safeguards Buses.

**AND**

2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.

**AND**

3. **EITHER** of the following:

a. Restoration of at least one unit 4KV safeguards Bus in **< 2 hours is not** likely.

**OR**

b. RPV water level **cannot** be restored and maintained **> -195 inches**.

**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 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 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

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MG1 (cont)**

**Basis (cont):**

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 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. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. T-101 RPV Control
6. SE-11, LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MS1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

1. Loss of **ALL** offsite AC Power to unit 4KV Safeguards Buses.

**AND**

2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.

**AND**

3. Failure to restore power to at least one unit 4KV Safeguards 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.

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

Escalation of the emergency classification level would be via ICs RG1, FG1, MG1, or MG2.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MS1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SS1
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.
1. AC power capability to unit 4KV Safeguards Buses reduced to only one of the following power sources for **≥ 15 minutes**.
    - 2 Emergency Auxiliary Transformer (0AX04)
    - 3 Emergency Auxiliary Transformer (0BX04)
    - E1 Diesel Generator
    - E2 Diesel Generator
    - E3 Diesel Generator
    - E4 Diesel Generator

**AND**

2. **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 MU1.

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.

- A loss of all offsite power with a concurrent failure of all but one emergency power source (e.g., an onsite diesel generator).

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MA1 (cont)**

**Basis (cont):**

- 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 MS1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SA1
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. DBD P-T-13, Station Blackout
6. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

Loss of **ALL** offsite AC power capability to unit 4KV Safeguards Buses for **≥15 minutes**.

**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.

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 MA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU1
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. DBD P-T-13, Station Blackout
6. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MG2****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.
1. Loss of **ALL** offsite AC power to unit 4KV safeguards Buses.  
**AND**
  2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.  
**AND**
  3. Voltage is **< 107.5 VDC** on unit 125 VDC battery buses 2(3)0D021, 2(3)0D022, 2(3)0D023, and 2(3)0D024.  
**AND**
  4. **ALL** AC and Vital DC power sources have been lost for **≥ 15 minutes**.

**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 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 all EAL conditions are met.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MG2 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SG8
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. DBD P-S-01A, 125/250 Vdc Station Batteries Including 125 Vdc Batteries & Chargers, Table T3.2-1, MCCs, and DC Distribution
6. SE-13 LOSS OF A 125 OR 250 VDC SAFETY RELATED BUS
7. ARC-220-20C209R H-3, 2B DC Power Panel Lo Voltage
8. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MS2****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

Voltage is **<107.5 VDC** on 125 VDC battery buses 2(3)0D021, 2(3)0D022, 2(3)0D023, and 2(3)0D024 for **≥15 minutes**.

**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 RG1, FG1 or MG2.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SS8
2. DBD P-S-01A, 125/250 Vdc Station Batteries Including 125 Vdc Batteries & Chargers, Table T3.2-1, MCCs, and DC Distribution
3. SE-13, LOSS OF A 125 OR 250 VDC SAFETY RELATED BUS
4. ARC-220-20C209R H-3, 2B DC Power Panel Lo Voltage

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MS3****Initiating Condition:**

Inability to shutdown the reactor causing a challenge to RPV water level or RCS heat removal.

**Operating Mode Applicability:**

1, 2

**Emergency Action Level (EAL):**

1. Automatic scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

2. **ALL** manual / ARI actions to shutdown the reactor have been unsuccessful as indicated by Reactor Power > 4%.

**AND**

3. **EITHER** of the following conditions exist:

- RPV water level **cannot** be restored and maintained > -195 inches

**OR**

- Heat Capacity Limit (T-102 Curve T/T-1) exceeded.

**Basis:**

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor scram 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, 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.

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 RG1 or FG1.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MS3 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SS5
2. T-117, Level/Power Control
3. T-101, RPV Control
4. T-102, Primary Containment Control

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA3****Initiating Condition:**

Automatic or manual scram 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. Automatic or manual scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

2. Manual / ARI actions taken at the Reactor Console are **not** successful in shutting down the reactor as indicated by Reactor Power > 4%.

**Basis:**

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor scram that results in a reactor shutdown, and subsequent operator manual actions taken at the reactor 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 consoles since this event entails a significant failure of the RPS.

A manual action at the reactor 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 scram. 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 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 consoles".

Taking the Reactor Mode Switch to Shutdown is considered to be a manual scram action.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA3 (cont)****Basis (cont):**

The plant response to the failure of an automatic or manual reactor scram 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 RPV water level or RCS heat removal safety functions, the emergency classification level will escalate to a Site Area Emergency via IC MS3. Depending upon plant responses and symptoms, escalation is also possible via IC FS1. Absent the plant conditions needed to meet either IC MS3 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. T-117, Level/Power Control
3. T-101, RPV Control

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU3****Initiating Condition:**

Automatic or manual scram 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. Automatic scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

- b. Subsequent manual / ARI action taken at the Reactor Console is successful in shutting down the reactor.

**OR**

2. a. Manual scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

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

1. Subsequent manual / ARI action taken at the Reactor Console is successful in shutting down the reactor.

**OR**

2. Subsequent automatic / ARI scram 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 scram that results in a reactor shutdown, and either a subsequent operator manual action taken at the reactor consoles or an automatic scram is successful in shutting 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.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU3 (cont)****Basis (cont):****EAL #1 Basis**

Following the failure on an automatic reactor scram, operators will promptly initiate manual actions at the reactor consoles to shutdown the reactor (e.g., initiate a manual reactor scram). 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 reactor consoles to shutdown the reactor (e.g., initiate a manual reactor scram/ARI using a different switch). Depending upon several factors, the initial or subsequent effort to manually scram the reactor, or a concurrent plant condition, may lead to the generation of an automatic reactor scram signal. If a subsequent manual or automatic scram/ARI 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 reactor 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 scram). 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 reactor consoles".

Taking the Reactor Mode Switch to Shutdown is considered to be a manual scram action.

The plant response to the failure of an automatic or manual reactor scram 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 reactor consoles are also unsuccessful in shutting down the reactor, then the emergency classification level will escalate to an Alert via IC MA3. Depending upon the plant response, escalation is also possible via IC FA1. Absent the plant conditions needed to meet either IC MA3 or FA1, an Unusual Event declaration is appropriate for this event.

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

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU3 (cont)**

**Basis (cont):**

Should a reactor scram 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 scram and the RPS fails to automatically shutdown the reactor, then this IC and the EALs are applicable, and should be evaluated.
- If the signal generated as a result of plant work does not cause a plant transient but should have generated an RPS scram signal and the scram 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. T-117, Level/Power Control

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MA4**

**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

**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.
1. UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥15 minutes**.

<b>Table M1 – Control Room Parameters</b>
<ul style="list-style-type: none"> <li>• Reactor Power</li> <li>• RPV Water Level</li> <li>• RPV Pressure</li> <li>• Drywell Pressure</li> <li>• Torus Level</li> <li>• Torus Temperature</li> </ul>

**AND**

2. **ANY** Table M2 transient in progress.

<b>Table M2 – Significant Transients</b>
<ul style="list-style-type: none"> <li>• Automatic or Manual Runback &gt;25% thermal reactor power</li> <li>• Electrical Load Rejection &gt;25% full electrical load</li> <li>• Reactor Scram</li> <li>• ECCS Actuation</li> <li>• Thermal Power oscillations &gt; 10%</li> </ul>

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA4 (cont)****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 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, RPV water level and RCS heat removal. The loss of the ability to determine one or more 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 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 RPV water 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 RS1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SA2

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU4**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥ 15 minutes**.

<b>Table M1 – Control Room Parameters</b>
<ul style="list-style-type: none"> <li>• Reactor Power</li> <li>• RPV Water Level</li> <li>• RPV Pressure</li> <li>• Drywell Pressure</li> <li>• Torus Level</li> <li>• Torus Temperature</li> </ul>

**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 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.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU4 (cont)**

**Basis (cont):**

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 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 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 MA4.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU2

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA5****Initiating Condition:**

Hazardous event affecting a SAFETY SYSTEM required for the current operating mode.

**Operating Mode Applicability:**

1, 2, 3

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

- If it is determined that the conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.

**1. The occurrence of ANY of the following hazardous events:**

- 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

**AND****2. EITHER of the following:**

- 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.

**OR**

- b. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

**Basis:**

**FIRE:** Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

**EXPLOSION:** A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

events may require a post-event inspection to determine if the attributes of an explosion are present.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA5 (cont)****Basis (cont):**

**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.

**VISIBLE DAMAGE:** Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

**EAL #2.a Basis**

This EAL addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

**EAL #2.b Basis**

This EAL addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, as well as damage to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC FS1 or RS1.

If the EAL conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 SA9
2. SE-5, Earthquake - Bases
3. SE-4, Flood – Bases
4. DBD P-T-09, Internal Hazards

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU6****Initiating Condition:**

RCS leakage for 15 minutes or longer.

**Operating Mode Applicability:**

1, 2, 3

**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.

1. RCS unidentified or pressure boundary leakage in the Drywell **> 10 gpm** for **≥ 15 minutes**.

**OR**

2. RCS identified leakage in the Drywell **>25 gpm** for **≥ 15 minutes**.

**OR**

3. Leakage from the RCS to a location outside the Drywell **>25 gpm** for **≥ 15 minutes**.

**Basis:**

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

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

This IC addresses RCS leakage which may be a precursor to a more significant event. In this case, RCS leakage has been detected and operators, following applicable procedures, have been unable to promptly isolate the leak. This condition is considered to be a potential degradation of the level of safety of the plant.

**EAL #1 and EAL #2 Basis**

These EALs are focused on a loss of mass from the RCS due to "unidentified leakage", "pressure boundary leakage" or "identified leakage" (as these leakage types are defined in the plant Technical Specifications).

**EAL #3 Basis**

This EAL addresses a RCS mass loss caused by an UNISOLABLE leak through an interfacing system.

These EALs thus apply to leakage into the containment, a secondary-side system or a location outside of containment.

The leak rate values for each EAL were selected because they are usually observable with normal Control Room indications. Lesser values typically require time-consuming

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU6 (cont)****Basis (cont):**

calculations to determine (e.g., a mass balance calculation). EAL #1 uses a lower value that reflects the greater significance of unidentified or pressure boundary leakage.

The release of mass from the RCS due to the as-designed/expected operation of any relief valve does not warrant an emergency classification.

A stuck-open Safety Relief Valve (SRV) or SRV leakage is not considered either identified or unidentified leakage by Technical Specifications and, therefore, is not applicable to this EAL.

The 15-minute threshold duration allows sufficient time for prompt operator actions to isolate the leakage, if possible.

Escalation of the emergency classification level would be via ICs of Recognition Category R or F.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU4
2. Technical Specifications 3.4.4, RCS Operational Leakage
3. UFSAR 4.10.3, Nuclear System Leakage Detection and Leakage Rate Limits
4. UFSAR 5.2.5, Primary Containment – Inspection and Testing
5. ST-O-020-560-2/3, Reactor Coolant Leakage Test
6. DBD P-S-34 Radwaste System, 3.3.1.3.1 Drywell Floor Drain Sump Operation
7. DBD P-S-34 Radwaste System, 3.3.1.3.2 Drywell Equipment Drain Sump Operation

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU7**

**Initiating Condition:**

Loss of all On-site or Off-site communications capabilities.

**Operating Mode Applicability:**

1, 2, 3

**Emergency Action Level (EAL):**

1. Loss of **ALL** Table M3 **Onsite** communications capability affecting the ability to perform routine operations.

**OR**

2. Loss of **ALL** Table M3 **Offsite** communication capability affecting the ability to perform offsite notifications.

**OR**

3. Loss of **ALL** Table M3 **NRC** communication capability affecting the ability to perform NRC notifications.

<b>Table M3 – Communications Capability</b>			
<b>System</b>	<b>Onsite</b>	<b>Offsite</b>	<b>NRC</b>
Station Radio System	X		
Plant Public Address (PA)	X		
OMNI System	X	X	
Station Phones	X	X	X
Satellite Phones	X	X	X
NARS		X	
HPN		X	X
ENS		X	X

**Basis:**

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points; individuals being sent to offsite locations, etc.).

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU7 (cont)**

**Basis (cont):**

**EAL #1Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

**EAL #2 Basis**

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MA-114-100-F-01, State/Local Event Notification Form.

**EAL #3 Basis**

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU6
2. UFSAR Section 10.21, Communication Systems
3. EP-MA-124-1001 Facility Inventories and Equipment Tests
4. NE-CG-400-19 Lighting and Communication Drawings

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

4, 5, D

**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.
1. Loss of **ALL** offsite AC power to unit 4KV Safeguards Buses.  
**AND**
  2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.  
**AND**
  3. Failure to restore power to at least one unit 4KV Safeguards 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.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as a Site Area Emergency because of the increased time available to restore an emergency bus to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition represents an actual or potential substantial degradation of the level of safety of the plant.

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

Escalation of the emergency classification level would be via IC CS6 or RS1.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA2
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. UFSAR Section 8.5.3, Standby AC Power Supply and Distribution
5. DBD P-S-05, 4KV System
6. DBD P-T-13, Station Blackout
7. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

4, 5, D

**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.

1. AC power capability to unit 4KV Safeguards Buses reduced to only one of the following power sources for **≥ 15 minutes**.

- 2 Emergency Auxiliary Transformer (0AX04)
- 3 Emergency Auxiliary Transformer (0BX04)
- E1 Diesel Generator
- E2 Diesel Generator
- E3 Diesel Generator
- E4 Diesel Generator

**AND**

2. **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.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as an Alert because of the increased time available to restore another power source to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition is considered to be a potential degradation of the level of safety of the plant.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU1 (cont)**

**Initiating Condition:**

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.

- 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.

The subsequent loss of the remaining single power source would escalate the event to an Alert in accordance with IC CA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6 CU2
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. UFSAR Section 8.5.3, Standby AC Power Supply and Distribution
5. DBD P-S-05, 4KV System
6. DBD P-T-13, Station Blackout
7. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA2**

**Initiating Condition:**

Hazardous event affecting SAFETY SYSTEM required for the current operating mode.

**Operating Mode Applicability:**

4, 5

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

- If it is determined that the conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

1. The occurrence of **ANY** of the following hazardous events:

- 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

**AND**

2. **EITHER** of the following:

- 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.

**OR**

- b. The event has caused **VISIBLE DAMAGE** to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

**Basis:**

**FIRE:** Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

**EXPLOSION:** A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such

**RECOGNITION CATEGORY**

**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

events may require a post-event inspection to determine if the attributes of an explosion are present.

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**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA2 (cont)**

**Basis (cont):**

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.

VISIBLE DAMAGE: Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

**EAL #2.a Basis**

Addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

**EAL #2.b Basis**

Addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, or to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC CS6 or RS1.

If the EAL conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA6

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU3**

**Initiating Condition:**

Loss of Vital DC power for 15 minutes or longer.

**Operating Mode Applicability:**

4, 5

**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.

Voltage is < **107.5 VDC** on required 125 VDC battery buses 2(3)0D021, 2(3)0D022 , 2(3)0D023 , and 2(3)0D024 for **≥ 15 minutes**.

**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 operable SAFETY SYSTEMS when the plant is in the cold shutdown or refueling mode. In these modes, the core decay heat load has been significantly reduced, and coolant system temperatures and pressures are lower; these conditions rise the time available to restore a vital DC bus to service. Thus, this condition is considered to be a potential degradation of the level of safety of the plant.

As used in this EAL, "required" means the Vital DC buses necessary to support operation of the in-service, or operable, train or trains of SAFETY SYSTEM equipment. For example, if Train A is out-of-service (inoperable) for scheduled outage maintenance work and Train B is in-service (operable), then a loss of Vital DC power affecting Train B would require the declaration of an Unusual Event. A loss of Vital DC power to Train A would not warrant an emergency classification.

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

Depending upon the event, escalation of the emergency classification level would be via IC CA6 or CA5, or an IC in Recognition Category R.

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COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU3 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CU4
2. DBD P-S-01A, 125/250 Vdc Station Batteries Including 125 Vdc Batteries & Chargers, Table T3.2-1, MCCs, and DC Distribution
3. SE-13, LOSS OF A 125 OR 250 VDC SAFETY RELATED BUS
4. ARC-220-20C209R H-3, 2B DC Power Panel Lo Voltage

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU4**

**Initiating Condition:**

Loss of all onsite or offsite communications capabilities.

**Operating Mode Applicability:**

4, 5, D

**Emergency Action Level (EAL):**

1. Loss of **ALL** Table C1 **Onsite** communications capability affecting the ability to perform routine operations.

**OR**

2. Loss of **ALL** Table C1 **Offsite** communication capability affecting the ability to perform offsite notifications.

**OR**

3. Loss of **ALL** Table C1 **NRC** communication capability affecting the ability to perform NRC notifications.

<b>Table C1 – Communications Capability</b>			
<b>System</b>	<b>Onsite</b>	<b>Offsite</b>	<b>NRC</b>
Station Radio System	X		
Plant Public Address (PA)	X		
OMNI System	X	X	
Station Phones	X	X	X
Satellite Phones	X	X	X
NARS		X	
HPN		X	X
ENS		X	X

**Basis:**

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points, individuals being sent to offsite locations, etc.).

**EAL #1 Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

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**CU4 (cont)**

**Basis (cont):**

**EAL #2 Basis**

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MA-114-100-F-01, State/Local Event Notification Form.

**EAL #3 Basis**

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CU5
2. UFSAR Section 10.21, Communication Systems
3. EP-MA-124-1001 Facility Inventories and Equipment Tests
4. NE-CG-400-19 Lighting and Communication Drawings

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA5**

**Initiating Condition:**

Inability to maintain the plant in cold shutdown.

**Operating Mode Applicability:**

4, 5

**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.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.

1. UNPLANNED rise in RCS temperature > **212°F** ~~due to loss of decay heat removal for > Table C2 duration.~~

<b>Table C2 – RCS Heat-up Duration Thresholds</b>		
<b>RCS Status</b>	<b>Containment Closure Status</b>	<b>Heat-up Duration</b>
Intact	Not Applicable	60 minutes*
Not Intact	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, then EAL #1 is <u>not</u> applicable.		

**OR**

2. UNPLANNED RPV pressure rise > **10 psig** as a result of temperature rise ~~due to loss of decay heat removal.~~

**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.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and

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components as a functional barrier to fission product release under shutdown conditions.

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**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CA5 (cont)**

**Basis (cont):**

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, or steam line nozzle plugs, etc.).

This IC addresses conditions involving a loss of decay heat removal capability or an addition of heat to the RCS in excess of that which can currently be removed. Either condition represents an actual or potential substantial degradation of the level of safety of the plant.

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

The RCS Heat-up Duration Thresholds table addresses a rise in RCS temperature when CONTAINMENT CLOSURE is established but the RCS is not intact. The 20-minute criterion was included to allow time for operator action to address the temperature rise.

The RCS Heat-up Duration Thresholds table also addresses a rise in RCS temperature with the RCS intact. The status of CONTAINMENT CLOSURE is not crucial in this condition since the intact RCS is providing a high pressure barrier to a fission product release. The 60-minute time frame should allow sufficient time to address the temperature rise without a substantial degradation in plant safety.

Finally, in the case where there is a rise in RCS temperature, the RCS is not intact, and CONTAINMENT CLOSURE is not established, no heat-up duration is allowed (i.e., 0 minutes). This is because 1) the evaporated reactor coolant may be released directly into the Containment atmosphere and subsequently to the environment, and 2) there is reduced reactor coolant inventory above the top of irradiated fuel.

**EAL #2 Basis**

Provides a pressure-based indication of RCS heat-up.

Escalation of the emergency classification level would be via IC CS6 or RS1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA3
2. Technical Specification 3.6.1.1, Primary Containment
3. Technical Specification 3.6.4.1, Secondary Containment
4. DBD P-S-16, REACTOR INSTRUMENTATION SYSTEM
5. DBD P-S-19, RECIRCULATION SYSTEM
6. SE-11, ATTACHMENT C – INSTRUMENT LIST

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU5**

**Initiating Condition:**

UNPLANNED rise in RCS temperature

**Operating Mode Applicability:**

4, 5

**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.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.

1. UNPLANNED rise in RCS temperature > **212°F** ~~due to loss of decay heat removal.~~

**OR**

2. Loss of the following for **≥ 15 minutes**.

- **ALL** RCS temperature indications
- AND**
- **ALL** RPV water level indications

**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.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, or steam line nozzle plugs, etc.).

This IC addresses an UNPLANNED rise in RCS temperature above the Technical Specification cold shutdown temperature limit, or the inability to determine RCS temperature and level, represents a potential degradation of the level of safety of the plant. If the RCS is not intact and CONTAINMENT CLOSURE is not established during this event, the Emergency Director should also refer to IC CA5.

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**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

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COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU5 (cont)**

**Basis (cont):**

EAL #1 involves a loss of decay heat removal capability, or an addition of heat to the RCS in excess of that which can currently be removed, such that reactor coolant temperature cannot be maintained below the cold shutdown temperature limit specified in Technical Specifications. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

During an outage, the level in the reactor vessel will normally be maintained above the reactor vessel flange. Refueling evolutions that lower water level below the reactor vessel flange are carefully planned and controlled. A loss of forced decay heat removal at reduced inventory may result in a rapid rise in reactor coolant temperature depending on the time after shutdown.

EAL #2 reflects a condition where there has been a significant loss of instrumentation capability necessary to monitor RCS conditions and operators would be unable to monitor key parameters necessary to assure core decay heat removal. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

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

Escalation to Alert would be via IC CA6 based on an inventory loss or IC CA5 based on exceeding plant configuration-specific time criteria.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CU3
2. T-102, Primary Containment Control – Bases
3. T-103, Secondary Containment Control – Bases
4. PBAPS 2/3 TRIP/SAMP CURVES, TABLES, & LIMITS – BASES
5. DBD P-S-16, REACTOR INSTRUMENTATION SYSTEM
6. DBD P-S-19, RECIRCULATION SYSTEM

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CG6**

**Initiating Condition:**

Loss of RPV inventory affecting fuel clad integrity with containment challenged.

**Operating Mode Applicability:**

4, 5

**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.

1. a. RPV water level < **-172 inches** (TAF) for **≥ 30 minutes**.

**AND**

- b. **ANY** Containment Challenge Indication (Table C4)

**OR**

2. a. RPV water level ~~unknown~~ **cannot** be monitored for **≥ 30 minutes**.

**AND**

- b. Core uncover is indicated by **ANY** of the following:

- Table C3 indications of a sufficient magnitude to indicate core uncover.

**OR**

- **ANY** Table C5 Refuel Floor Area Radiation Monitor >**3 R/hr**.

**AND**

- c. **ANY** Containment Challenge Indication (Table C4)

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"> <li>• UNPLANNED floor or equipment sump level rise*</li> <li>• UNPLANNED Torus level rise*</li> <li>• UNPLANNED vessel make up rate rise</li> <li>• Observation of leakage or inventory loss</li> </ul>
*Rise in level is attributed to a loss of RPV inventory.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CG6 (cont)**

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

<b>Table C4 – Containment Challenge Indications</b>
<ul style="list-style-type: none"> <li>• Primary Containment Hydrogen Concentration &gt; <b>6% and Oxygen &gt; 5%</b></li> <li>• UNPLANNED rise in containment pressure</li> <li>• CONTAINMENT CLOSURE <b>not</b> established*</li> <li>• Any Secondary Containment radiation monitor &gt; <b>T-103 Action Level</b></li> </ul>
<p>* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is <b>not</b> required.</p>

<b>Table C5 Refuel Floor ARM's</b>
<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>

**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.

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.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CG6 (cont)**

**Basis (cont):**

This IC addresses the inability to restore and maintain reactor vessel level above the top of active fuel with containment challenged. This condition represents actual or IMMEDIATE substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guidelines (PAG) exposure levels offsite for more than the immediate site area.

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable.

With CONTAINMENT CLOSURE not established, there is a high potential for a direct and unmonitored release of radioactivity to the environment. If CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute time limit, then declaration of a General Emergency is not required.

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 challenge to Containment integrity.

In the early stages of a core uncover event, it is unlikely that hydrogen buildup due to a core uncover could result in an explosive gas mixture in containment. If all installed hydrogen gas monitors are out-of-service during an event leading to fuel cladding damage, it may not be possible to obtain a containment hydrogen gas concentration reading as ambient conditions within the containment will preclude personnel access. During periods when installed containment hydrogen gas monitors are out-of-service, operators may use the other listed indications to assess whether or not containment is challenged.

**EAL #1 Basis**

The 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

The inability to monitor RPV water level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CG6 (cont)**

**Basis (cont):**

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CG1
2. T-101, RPV Control
3. T-102 Primary Containment Control
4. T-103 Secondary Containment Control
5. Technical Specification 3.6.1.1, Primary Containment
6. Technical Specification 3.6.4.1, Secondary Containment
7. UFSAR Table 5.2-1, Primary Containment
8. EP-EAL-0501, Estimation of Radiation Monitor Readings Indicating Core Uncovery During Refuel
9. DBD P-T-02, Containment, Section 3.2.14
10. DBD P-S-20, Neutron Monitoring System

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CS6**

**Initiating Condition:**

Loss of RPV inventory affecting core decay heat removal capability.

**Operating Mode Applicability:**

4, 5

**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.

1. With CONTAINMENT CLOSURE **not** established, RPV water level < **-160 inches**.

**OR**

2. With CONTAINMENT CLOSURE established, RPV water level < **- 172 inches (TAF)**.

**OR**

3. a. RPV water level **cannot** be monitored ~~unknown~~ for **≥ 30 minutes**

**AND**

b. Core uncover is indicated by **ANY** of the following:

- Table C3 indications of a sufficient magnitude to indicate core uncover.

**OR**

- **ANY** Table C5 Refuel Floor Area Radiation Monitor **>3 R/hr**.

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"> <li>● UNPLANNED floor or equipment sump level rise*</li> <li>● UNPLANNED Torus level rise*</li> <li>● UNPLANNED vessel make up rate rise</li> <li>● Observation of leakage or inventory loss</li> </ul>
*Rise in level is attributed to a loss of RPV inventory.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CS6 (cont)**

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

<b>Table C5</b> <b>Refuel Floor ARM's</b>
<ul style="list-style-type: none"><li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li><li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li><li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li><li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li></ul>

**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.

**CONTAINMENT CLOSURE:** The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

The lost inventory may be due to a RCS component failure, a loss of configuration control or prolonged boiling of reactor coolant. These conditions entail major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable. Outage/shutdown contingency plans typically provide for re-establishing or verifying CONTAINMENT CLOSURE following a loss of heat removal or RCS inventory control functions. The difference in the specified RCS/reactor vessel levels of EALs #1 and #2 reflect the fact that with CONTAINMENT CLOSURE established, there is a lower probability of a fission product release to the environment.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CS6 (cont)**

**Basis:**

In **EAL #3.a**, the 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

The inability to monitor RPV water level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

Escalation of the emergency classification level would be via IC CG6 or RG1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CS1
2. T-101, RPV Control
3. T-102 Primary Containment Control
5. Technical Specification 3.6.1.1, Primary Containment
6. Technical Specification 3.6.4.1, Secondary Containment
7. UFSAR Table 5.2-1, Primary Containment
8. EP-EAL-0501, Estimation of Radiation Monitor Readings Indicating Core Uncovery During Refuel
9. DBD P-T-02, Containment, Section 3.2.14
10. DBD P-S-20, Neutron Monitoring System

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA6**

**Initiating Condition:**

Loss of RPV inventory.

**Operating Mode Applicability:**

4, 5

**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.
  1. a. Loss of RPV inventory as indicated by level < - 48 inches.
 

**OR**
  2. a. RPV water level cannot be monitored ~~unknown~~ for ≥ 15 minutes.
 

**AND**
  - b. Loss of RPV inventory per Table C3 indications.

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"> <li>● UNPLANNED floor or equipment sump level rise*</li> <li>● UNPLANNED Torus level rise*</li> <li>● UNPLANNED vessel make up rate rise</li> <li>● Observation of leakage or inventory loss</li> </ul>
*Rise in level is attributed to a loss of RPV inventory.

**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 conditions that are precursors to a loss of the ability to adequately cool irradiated fuel (i.e., a precursor to a challenge to the fuel clad barrier). This condition represents a potential substantial reduction in the level of plant safety.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS  
CA6 (cont)**

**Basis (cont):**

**EAL #1 Basis**

A lowering of water level below -48 inches indicates that operator actions have not been successful in restoring and maintaining RPV water level. The heat-up rate of the coolant will rise as the available water inventory is reduced. A continuing drop in water level will lead to core uncover.

Although related, EAL #1 is concerned with the loss of RCS inventory and not the potential concurrent effects on systems needed for decay heat removal (e.g., loss of a Residual Heat Removal suction point). A rise in RCS temperature caused by a loss of decay heat removal capability is evaluated under IC CA5.

**EAL #2 Basis**

The inability to monitor RPV water level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

The 15-minute duration for the loss of level indication was chosen because it is half of the Threshold duration specified in IC CS6

If the RPV water level continues to lower, then escalation to Site Area Emergency would be via IC CS6.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA1
2. Technical Specification 3.4.4, RCS Operational Leakage
3. UFSAR 5.2.5, Primary Containment
4. ST-O-020-560-2/3 REACTOR COOLANT LEAKAGE TEST
5. OT-101 HIGH DRYWELL PRESSURE - PROCEDURE
6. ARC 227-A4 Drywell Hi Pressure Sealed-In
7. ARC 210-A4 Drywell Hi-Lo Pressure
8. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.1 Drywell Floor Drain Sump Operation
9. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.2 Drywell Equipment Drain Sump Operation
10. T-102, Primary Containment Control

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU6**

**Initiating Condition:**

UNPLANNED loss of RPV inventory for 15 minutes or longer.

**Operating Mode Applicability:**

4, 5

**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.

1. UNPLANNED loss of reactor coolant results in the inability to restore and maintain RPV water level to above the **procedurally established lower limit** for **≥ 15 minutes**.

**OR**

2. a. RPV water level **cannot** be monitored ~~unknown~~

**AND**

b. Loss of RPV inventory per Table C3 indications.

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"> <li>• UNPLANNED floor or equipment sump level rise*</li> <li>• UNPLANNED Torus level rise*</li> <li>• UNPLANNED vessel make up rate rise</li> <li>• Observation of leakage or inventory loss</li> </ul>
*Rise in level is attributed to a loss of RPV inventory.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU6 (cont)**

**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 the inability to restore and maintain water level to a required minimum level (or the lower limit of a level band), or a loss of the ability to monitor RPV water level concurrent with indications of coolant leakage. Either of these conditions is considered to be a potential degradation of the level of safety of the plant.

The procedurally established lower limit is not an operational band established above the procedural limit to allow for operator action prior to exceeding the procedural limit, but it is the procedurally established lower limit.

Refueling evolutions that decrease RCS water inventory are carefully planned and controlled. An UNPLANNED event that results in water level decreasing below a procedurally required limit warrants the declaration of an Unusual Event due to the reduced water inventory that is available to keep the core covered.

**EAL #1 Basis**

Recognizes that the minimum required RPV water level can change several times during the course of a refueling outage as different plant configurations and system lineups are implemented. This EAL is met if the minimum level, specified for the current plant conditions, cannot be maintained for 15 minutes or longer. The minimum level is typically specified in the applicable operating procedure but may be specified in another controlling document.

The 15-minute threshold duration allows sufficient time for prompt operator actions to restore and maintain the expected water level. This criterion excludes transient conditions causing a brief lowering of water level.

**EAL #2 Basis**

Addresses a condition where all means to determine RPV water level have been lost. In this condition, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

Continued loss of RCS inventory may result in escalation to the Alert emergency classification level via either IC CA6 or CA5.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS  
CU6 (cont)**

**Basis Reference(s):**

1. NEI 99-01, Rev. 6 CU1
2. Technical Specification 3.4.4, RCS Operational Leakage
3. UFSAR 5.2.5, Primary Containment
4. ST-O-020-560-2/3 REACTOR COOLANT LEAKAGE TEST
5. OT-101 HIGH DRYWELL PRESSURE - PROCEDURE
6. ARC 227-A4 Drywell Hi Pressure Sealed-In
7. ARC 210-A4 Drywell Hi-Lo Pressure
8. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.1 Drywell Floor Drain Sump Operation
9. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.2 Drywell Equipment Drain Sump Operation
10. T-102, Primary Containment Control

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HG1****Initiating Condition:**

HOSTILE ACTION resulting in loss of physical control of the facility.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

1. A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

**AND**

2. a. **ANY** Table H1 safety function **cannot** be controlled or maintained.

**OR**

- b. Damage to spent fuel has occurred or is IMMINENT

**Table H1 – Safety Functions**

- |  |
|--|
| <ul style="list-style-type: none"> <li>• Reactivity Control<br/>(ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul> |
|--|

**Basis:**

**HOSTILE ACTION:** An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

**HOSTAGE:** A person(s) held as leverage against the station to ensure that demands will be met by the station.

**PROJECTILE:** An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

**PROTECTED AREA:** An area that normally encompasses all controlled areas within the security protected area fence.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HG1 (cont)**

**Basis (cont):**

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.

HOSTILE FORCE: One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g., pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained.

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]*.

**Basis Reference(s):**

1. NEI 99-01, Rev. 6 HG1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HS1**

**Initiating Condition:**

HOSTILE ACTION within the PROTECTED AREA.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI): A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses the occurrence of a HOSTILE ACTION within the PROTECTED AREA. This event will require rapid response and assistance due to the possibility for damage to plant equipment.

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]*.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HS1 (cont)**

**Basis (cont):**

As time and conditions allow, these events require a heightened state of readiness by the plant staff and implementation of onsite protective measures (e.g., evacuation, dispersal or sheltering). The Site Area Emergency declaration will mobilize ORO resources and have them available to develop and implement public protective actions in the unlikely event that the attack is successful in impairing multiple safety functions.

This IC does not apply to a HOSTILE ACTION directed at an ISFSI PROTECTED AREA located outside the plant PROTECTED AREA; such an attack should be assessed using IC HA1. It also does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

Escalation of the emergency classification level would be via IC HG1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, HS1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA1**

**Initiating Condition:**

HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

1. A validated notification from NRC of an aircraft attack threat < **30 minutes** from the site.

**OR**

2. Notification by the Security Force that a HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

OWNER CONTROLLED AREA (OCA): The property associated with the station and owned by the company. Access is normally limited to persons entering for official business.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

This IC addresses the occurrence of a HOSTILE ACTION within the OWNER CONTROLLED AREA or notification of an aircraft attack threat. This event will require rapid response and assistance due to the possibility of the attack progressing to the PROTECTED AREA, or the need to prepare the plant and staff for a potential aircraft impact.

**RECOGNITION CATEGORY**  
**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**  
**HA1 (cont)**

**Basis (cont):**

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Institution Security Program]*.

As time and conditions allow, these events require a heightened state of readiness by the plant staff and implementation of onsite protective measures (e.g., evacuation, dispersal or sheltering). The Alert declaration will also heighten the awareness of Offsite Response Organizations, allowing them to be better prepared should it be necessary to consider further actions.

This IC does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

**EAL #1 Basis**

Addresses the threat from the impact of an aircraft on the plant, and the anticipated arrival time is within 30 minutes. The intent of this EAL is to ensure that threat-related notifications are made in a timely manner so that plant personnel and OROs are in a heightened state of readiness. This EAL is met when the threat-related information has been validated in accordance with SE-23, Response to Security Threats.

**EAL #2 Basis**

Applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA. This includes any action directed against an ISFSI that is located outside the plant PROTECTED AREA.

The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may be provided by NORAD through the NRC.

In some cases, it may not be readily apparent if an aircraft impact within the OWNER CONTROLLED AREA was intentional (i.e., a HOSTILE ACTION). It is expected, although not certain, that notification by an appropriate Federal agency to the site would clarify this point. In this case, the appropriate federal agency is intended to be NORAD, FBI, FAA or NRC. The emergency declaration, including one based on other ICs/EALs, should not be unduly delayed while awaiting notification by a Federal agency.

Escalation of the emergency classification level would be via IC HS1.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, HA1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU1**

**Initiating Condition:**

Confirmed SECURITY CONDITION or threat.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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.

**OR**

2. A validated notification from the NRC providing information of an aircraft threat.

**OR**

3. Notification by the Security Force of a SECURITY CONDITION that does not involve a HOSTILE ACTION.

**Basis:**

**SECURITY CONDITION:** Any Security Event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A SECURITY CONDITION does not involve a HOSTILE ACTION

**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.

**HOSTILE ACTION:** An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

**HOSTAGE:** A person(s) held as leverage against the station to ensure that demands will be met by the station.

**PROJECTILE:** An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses events that pose a threat to plant personnel or SAFETY SYSTEM equipment, and thus represent a potential degradation in the level of plant safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under ICs HA1, HS1 and HG1.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU1 (cont)**

**Basis (cont):**

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to plant personnel and OROs.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]*.

**EAL #1 Basis**

Addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with SY-AA-101-132.

**EAL #2 Basis**

Addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with SE-23, Response to Security Threats.

**EAL #3 Basis**

References Security Force because these are the individuals trained to confirm that a security event is occurring or has occurred. Training on security event confirmation and classification is controlled due to the nature of Safeguards and 10 CFR § 2.39 information.

Escalation of the emergency classification level would be via IC HA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, HU1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats
4. SY-AA-101-132, Security Assessment and Response to Unusual Activities

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HS2**

**Initiating Condition:**

Inability to control a key safety function from outside the Control Room.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**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.
1. A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per:
    - SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure
    - OR**
    - SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure
  - AND**
  2. Control of **ANY** Table H1 key safety function is **not** reestablished in **< 15 minutes**.

<b>Table H1 – Safety Functions</b>
<ul style="list-style-type: none"> <li>• Reactivity Control (ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul>

**Basis:**

The time period to establish control of the plant starts when either:

- a. Control of the plant is no longer maintained in the Main Control Room
- OR**
- b. The last Operator has left the Main Control Room.

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations, and the control of a key safety function cannot be reestablished in a timely manner. The failure to gain control of a key safety function following a transfer of plan control to alternate locations is a precursor to a challenge to one or more fission product barriers within a relatively short period of time.

**RECOGNITION CATEGORY**  
**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**  
**HS2 (cont)**

**Basis (cont):**

The determination of whether or not “control” is established at the remote safe shutdown location(s) is based on Emergency Director judgment. The Emergency Director is expected to make a reasonable, informed judgment within 15 minutes

whether or not the operating staff has control of key safety functions from the remote safe shutdown location(s).

Escalation of the emergency classification level would be via IC FG1 or CG6.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HS6
2. SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure
3. SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA2**

**Initiating Condition:**

Control Room evacuation resulting in transfer of plant control to alternate locations.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per:

- SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure
- OR**
- SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure

**Basis:**

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations outside the Control Room. The loss of the ability to control the plant from the Control Room is considered to be a potential substantial degradation in the level of plant safety.

Following a Control Room evacuation, control of the plant will be transferred to alternate shutdown locations. The necessity to control a plant shutdown from outside the Control Room, in addition to responding to the event that required the evacuation of the Control Room, will present challenges to plant operators and other on-shift personnel. Activation of the ERO and emergency response facilities will assist in responding to these challenges.

Escalation of the emergency classification level would be via IC HS2.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HA6
2. SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure
3. SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU3**

**Initiating Condition:**

FIRE potentially degrading the level of safety of the plant.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**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.
- Escalation of the emergency classification level would be via IC CA2 or MA5

1. A FIRE in **ANY** Table H2 area is **not** extinguished in **< 15-minutes** of **ANY** of the following FIRE detection indications:

- 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

<b>Table H2 – Vital Areas</b>
<ul style="list-style-type: none"> <li>• Reactor Building (when inerted the Drywell is exempt)</li> <li>• Control Room</li> <li>• Diesel Generator Building</li> <li>• Emergency Pump Structure</li> <li>• Inner Screen Structure</li> <li>• Emergency Cooling Tower</li> <li>• Emergency Switchgear/Battery Rooms</li> <li>• Cable Spread Room</li> </ul>

**OR**

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.

**OR**

3 A FIRE within the plant PROTECTED AREA or ISFSI PROTECTED AREA **not** extinguished in **< 60-minutes** of the initial report, alarm or indication.

**OR**

4 A FIRE within the plant PROTECTED AREA or ISFSI PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish.

**RECOGNITION CATEGORY**  
**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**  
**HU3 (cont)**

**Basis:**

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI): A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses the magnitude and extent of FIRES that may be indicative of a potential degradation of the level of safety of the plant.

**EAL #1 Basis**

The intent of the 15-minute duration is to size the FIRE and to discriminate against small FIRES that are readily extinguished (e.g., smoldering waste paper basket). In addition to alarms, other indications of a FIRE could be a drop in fire main pressure, automatic activation of a suppression system, etc.

Upon receipt, operators will take prompt actions to confirm the validity of an initial fire alarm, indication, or report. For EAL assessment purposes, the emergency declaration clock starts at the time that the initial alarm, indication, or report was received, and not the time that a subsequent verification action was performed. Similarly, the fire duration clock also starts at the time of receipt of the initial alarms, indication or report.

**EAL #2 Basis**

This EAL addresses receipt of a single fire alarm, and the existence of a FIRE is not verified (i.e., proved or disproved) within 30-minutes of the alarm. Upon receipt, operators will take prompt actions to confirm the validity of a single fire alarm. For EAL assessment purposes, the 30-minute clock starts at the time that the initial alarm was received, and not the time that a subsequent verification action was performed.

A single fire alarm, absent other indication(s) of a FIRE, may be indicative of equipment failure or a spurious activation, and not an actual FIRE. For this reason, additional time is allowed to verify the validity of the alarm. The 30-minute period is a reasonable amount of time to determine if an actual FIRE exists; however, after that time, and absent information to the contrary, it is assumed that an actual FIRE is in progress.

**RECOGNITION CATEGORY**  
**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**  
**HU3 (cont)**

**Basis (cont):**

If an actual FIRE is verified by a report from the field, then EAL #1 is immediately applicable, and the emergency must be declared if the FIRE is not extinguished within 15-minutes of the report. If the alarm is verified to be due to an equipment failure or a spurious activation, and this verification occurs within 30-minutes of the receipt of the alarm, then this EAL is not applicable and no emergency declaration is warranted.

**EAL #3 Basis**

In addition to a FIRE addressed by EAL #1 or EAL #2, a FIRE within the plant PROTECTED AREA not extinguished within 60-minutes may also potentially degrade the level of plant safety. This basis extends to a FIRE occurring within the PROTECTED AREA of an ISFSI located outside the plant PROTECTED AREA.

**EAL #4 Basis**

If a FIRE within the plant or ISFSI PROTECTED AREA is of sufficient size to require a response by an offsite firefighting agency (e.g., a local town Fire Department), then the level of plant safety is potentially degraded. The dispatch of an offsite firefighting agency to the site requires an emergency declaration only if it is needed to actively support firefighting efforts because the fire is beyond the capability of the Fire Brigade to extinguish. Declaration is not necessary if the agency resources are placed on stand-by, or supporting post-extinguishment recovery or investigation actions.

Basis-Related Requirements from Appendix R

Appendix R to 10 CFR 50, states in part:

Criterion 3 of Appendix A to this part specifies that "Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions."

When considering the effects of fire, those systems associated with achieving and maintaining safe shutdown conditions assume major importance to safety because damage to them can lead to core damage resulting from loss of coolant through boil-off.

Because fire may affect safe shutdown systems and because the loss of function of systems used to mitigate the consequences of design basis accidents under post-fire conditions does not per se impact public safety, the need to limit fire damage to systems required to achieve and maintain safe shutdown conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design basis accidents.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU3 (cont)**

**Basis (cont):**

In addition, Appendix R to 10 CFR 50, requires, among other considerations, the use of 1-hour fire barriers for the enclosure of cable and equipment and associated non-safety circuits of one redundant train (G.2.c). As used in EAL #2, the 30-minutes to verify a single alarm is well within this worst-case 1-hour time period.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU4
2. T-300 Bases, Fire Guides
3. ON-114, Actual Fire Reported in the Power Block, Diesel Generator Building, Emergency Pump, Inner Screen or Emergency Cooling Tower Structures

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU4**

**Initiating Condition:**

Seismic event greater than OBE levels.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

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

- Escalation of the emergency classification level would be via IC CA2 or MA5
- For emergency classification if EAL 2.b is not able to be confirmed, then the occurrence of a seismic event is confirmed in manner deemed appropriate by the Shift Manager or Emergency Director in  $\leq 15$  mins of the event.

1. Seismic event  $>$  **Operating Basis Earthquake (OBE)** as indicated by the Alarm on Panel 316 A-5."OPERATING BASIS EARTHQUAKE EXCEEDED"

**OR**

2. When Seismic Monitoring Equipment is **not** available:

a. Control Room personnel feel an actual or potential seismic event.

**AND**

b. **ANY** one of the following confirmed in  $\leq 15$  mins of the event:

- The earthquake resulted in Modified Mercalli Intensity (MMI)  $\geq VI$  and occurred  $\leq 3.5$  miles of the plant.
- The earthquake was magnitude  $\geq 6.0$
- The earthquake was magnitude  $\geq 5.0$  and occurred  $\leq 125$  miles of the plant.

~~Seismic event  $>$  **Operating Basis Earthquake (OBE)** as indicated by the Alarm on Panel 316 A-5."OPERATING BASIS EARTHQUAKE EXCEEDED"~~

**Basis:**

This IC addresses a seismic event that results in accelerations at the plant site greater than those specified for an Operating Basis Earthquake (OBE)<sup>1</sup>. An earthquake greater than an OBE but less than a Safe Shutdown Earthquake (SSE)<sup>2</sup> should have no

<sup>1</sup> An OBE is vibratory ground motion for which those features of a nuclear power plant necessary for continued operation without undue risk to the health and safety of the public will remain functional.

<sup>2</sup> An SSE is vibratory ground motion for which certain (generally, safety-related) structures, systems, and components must be designed to remain functional.

**RECOGNITION CATEGORY**

**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

significant impact on safety-related systems, structures and components; however, some time may be required for the plant staff to ascertain the actual post-event condition of the plant (e.g., performs walk-downs and post-event inspections). Given the time necessary to perform walk-downs and inspections, and fully understand any impacts, this event represents a potential degradation of the level of safety of the plant.

Event verification with external sources should not be necessary during or following an OBE. Earthquakes of this magnitude should be readily felt by on-site personnel and recognized as a seismic event (e.g., typical lateral accelerations are in excess of 0.08g). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., a call to the USGS, check internet news sources, etc.); however, the verification action must not preclude a timely emergency declaration.

EAL #2.b and the accompanying note is included to ensure that a declaration does not result from felt vibrations caused by a non-seismic source (e.g., a dropped load). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., call to USGS, check internet source, etc.) however, the verification action must not preclude a timely emergency declaration. This guidance recognizes that it may cause the site to declare an Unusual Event while another site, similarly affected but with readily available OBE indications in the Control Room, may not.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU4 (cont)**

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU2
2. SE-5, Earthquake – Bases

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA5**

**Initiating Condition:**

Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, ~~D~~

**Emergency Action Level (EAL):**

**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.

1. Release of a toxic, corrosive, asphyxiant or flammable gas in a Table H3 area.

<b>Table H3 Areas with Entry Related Mode Applicability</b>	
<b>Area of concern</b>	<b>Entry Related Mode Applicability</b>
<b>Reactor Building</b>	Modes 3, 4 and 5
135' all areas	
<b>Control Room</b>	Modes 1, 2, 3, 4, and 5

**AND**

2. Entry into the room or area is prohibited or impeded

**Basis:**

This IC addresses an event involving a release of a hazardous gas that precludes or impedes access to equipment necessary to maintain normal plant operation, or required for a normal plant cooldown and shutdown. This condition represents an actual or potential substantial degradation of the level of safety of the plant.

Assuming all plant equipment is operating as designed, normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table H3 is a list of plant rooms or areas in addition to the main control room with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HA5 (cont)**

**Basis (cont):**

from normal plant operation, 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).

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 gaseous release preclude the ability to place shutdown cooling in service. The emergency classification is not contingent upon whether entry is actually necessary at the time of the release.

Evaluation of the IC and EAL do not require atmospheric sampling; it only requires the Emergency Director's judgment that the gas concentration in the affected room/area is sufficient to preclude or significantly impede procedurally required access. This judgment may be based on a variety of factors including an existing job hazard analysis, report of ill effects on personnel, advice from a subject matter expert or operating experience with the same or similar hazards. Access should be considered as impeded if extraordinary measures are necessary to facilitate entry of personnel into the affected room/area (e.g., requiring use of protective equipment, such as SCBAs, that is not routinely employed).

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 gaseous release). For example, the plant is in Mode 1 when the gaseous release occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.
- The gas release is a planned activity that includes compensatory measures which address the temporary inaccessibility of a room or area (e.g., fire suppression system testing).
- 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.

An asphyxiant is a gas capable of reducing the level of oxygen in the body to dangerous levels. Most commonly, asphyxiants work by merely displacing air in an enclosed environment. This reduces the concentration of oxygen below the normal level of around 19%, which can lead to breathing difficulties, unconsciousness or even death.

This EAL does not apply to firefighting activities that generate smoke, that automatically or manually activate a fire suppression system in an area, or to intentional inerting of containment.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HA5 (cont)**

**Basis (cont):**

The Operating Mode Applicability of this EAL has been revised from All Modes to modes 1, 2, 3 4, and 5 due to the mode applicability of the areas of concern in Table H-3. In the future should the areas of concern in Table H-3 be revised then the Operating Mode Applicability of this EAL should be reevaluated.

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

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HA5
2. T-300 Bases
3. AR 660892, Station Halon and IDLH Evaluations
4. 29CFR1910.134(b) and 29CFR1910.134(d)(2)(iii)
5. ON-114, Actual Fire Reported in the Power Block, Diesel Generator Building, Emergency Pump, Inner Screen or Emergency Cooling Tower Structures
6. SO 10.1.B-2(3), "Residual Heat Removal System Shutdown Cooling Mode Manual Start"

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU6**

**Initiating Condition:**

Hazardous Event

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

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

- EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.
- Escalation of the emergency classification level would be via IC CA2 or MA5

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.

**OR**5. Abnormal River level, as indicated by **EITHER**:

- > 112 ft. (high level)

**OR**

- < 98.5 ft. (low level)

**Basis:**

**PROTECTED AREA:** An area that normally encompasses all controlled areas within the security protected area fence.

**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**  
**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**  
**HU6 (cont)**

**Basis (cont):**

This IC addresses hazardous events that are considered to represent a potential degradation of the level of safety of the plant.

**EAL #1 Basis**

Addresses a tornado striking (touching down) within the Protected Area.

**EAL #2 Basis**

Addresses flooding of a building room or area that results in operators isolating power to a SAFETY SYSTEM component due to water level or other wetting concerns. Classification is also required if the water level or related wetting causes an automatic isolation of a SAFETY SYSTEM component from its power source (e.g., a breaker or relay trip). To warrant classification, operability of the affected component must be required by Technical Specifications for the current operating mode. ~~Manual isolation of power to a SAFETY SYSTEM component as a result of leakage is an event of lesser impact and would be expected to cause small and localized damage. The consequence of this type of event is adequately assessed and addressed in accordance with Technical Specifications.~~

**EAL #3 Basis**

Addresses a hazardous materials event originating at an offsite location and of sufficient magnitude to impede the movement of personnel within the PROTECTED AREA.

**EAL #4 Basis**

Addresses a hazardous event that causes an on-site impediment to vehicle movement and significant enough to prohibit the plant staff from accessing the site using personal vehicles. Examples of such an event include site flooding caused by a hurricane, heavy rains, up-river water releases, dam failure, etc., or an on-site train derailment blocking the access road.

This EAL is not intended to apply to routine impediments such as fog, snow, ice, or vehicle breakdowns or accidents, but rather to more significant conditions such as the Hurricane Andrew strike on Turkey Point in 1992, the flooding around the Cooper Station during the Midwest floods of 1993, or the flooding around Ft. Calhoun Station in 2011.

**RECOGNITION CATEGORY**  
**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**  
**HU6 (cont)**

**Basis (cont):****EAL #5 Basis**

Cooling water is pumped from the normal heat sink (Conowingo Pond) via the pump structure.

High River level of greater than 112 feet: At this level open grating in the operating floor of the Circulating Water Pump Structure will allow water from the circulating water bays to rise into the structure during postulated external flooding conditions. Per the UFSAR, "The configuration of the circulating water system would likely trip at a flood elevation of about 113 feet. Therefore, a river elevation of 111 feet was chosen as the elevation at which a "flood-related shutdown is initiated." The use of a threshold of 112 feet for the Unusual Event would represent a condition prior to the postulated loss of circulating water.

Low River level of less than 98.5 feet: This is the plant low water design level and consistent with T.S. 3.7.2 (Minimum Water Level in Pump Bay). Per the UFSAR, with river level at 104 feet, when an uncontrolled release of about 350,000 cfs is passed through the Conowingo Dam and there is no in flow into pond, it will require about 1-1/2 hours to drop level to 98.5 feet.

Escalation of the emergency classification level would be based on ICs in Recognition Categories R, F, M, H or C.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU3
2. SE-4, Flood – Bases
3. DBD P-T-09, Internal Hazards
4. UFSAR Section 2.4.3.5.5, Emergency Shutdown due to High or Low Water Level in Conowingo Pond

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HG7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a GENERAL EMERGENCY.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (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 offsite for more than the immediate site area.

**Basis:**

IMMEDIATE: 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.

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a General Emergency.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HG7

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HS7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a SITE AREA EMERGENCY.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (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.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a Site Area Emergency.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HS7

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an ALERT.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (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.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an Alert.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HA7

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an UNUSUAL EVENT.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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.

**Basis:**

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an UNUSUAL EVENT.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU7

**RECOGNITION CATEGORY  
ISFSI MALFUNCTIONS****E-HU1****Initiating Condition**

Damage to a loaded cask CONFINEMENT BOUNDARY.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading:

- **> 350 mr/hr gamma and 30 mr/hr neutron** on the top (protective cover)  
**OR**
- **> 250 mr/hr gamma and 60 mr/hr neutron** on the sides of the radial neutron shield  
**OR**
- **> 1100 mr/hr gamma and 250 mr/hr neutron** on the side surfaces of the cask above the radial neutron shield  
**OR**
- **> 800 mr/hr gamma and 600 mr/hr neutron** on the side surfaces of the cask below the radial neutron shield.

**.Basis:**

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

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) : A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses an event that results in damage to the CONFINEMENT BOUNDARY of a storage cask containing spent fuel. It applies to irradiated fuel that is licensed for dry storage beginning at the point that the loaded storage cask is sealed. The word cask, as used in this EAL, refers to the storage container in use at the site for dry storage of irradiated fuel. The issues of concern are the creation of a potential or actual release path to the environment, degradation of one or more fuel assemblies due to environmental factors, and configuration changes which could cause challenges in removing the cask or fuel from storage.

**RECOGNITION CATEGORY  
ISFSI MALFUNCTIONS****E-HU1 (cont)****Basis (cont):**

The existence of "damage" is determined by radiological survey. The technical specification multiple of "2 times", which is also used in Recognition Category R IC RU1, is used here to distinguish between non-emergency and emergency conditions. The emphasis for this classification is the degradation in the level of safety of the spent fuel cask and not the magnitude of the associated dose or dose rate. It is recognized that in the case of extreme damage to a loaded cask, the fact that the "on-contact" dose rate limit is exceeded may be determined based on measurement of a dose rate at some distance from the cask.

Security-related events for ISFSIs are covered under ICs HU1 and HA1.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 E-HU1
2. Certificate of Compliance No. 1027, TN-68 Technical Specifications Amendment No.1 Section 5.2.3

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RG1****Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 1000 mRem TEDE or 5000 mRem thyroid CDE.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
  - 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. Readings on **ANY** Table R1 Effluent Monitor > **Table R1 value** for **≥ 15 minutes**.  
**OR**
  2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of **EITHER**:
    - a. > **1000 mRem TEDE****OR**
    - b. > **5000 mRem CDE Thyroid****OR**
  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.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RG1 (cont)**

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>General Emergency</b>
<b>Main Stack</b> (RI-0-17-050B Common)	5.57 E+09 uCi/sec
<b>Vent Stack</b> (RI-2979B Unit 2 or RI-3979B Unit 3)	1.60 E+08 uCi/sec

**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 mRem while the 5000 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AG1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station
4. EP-AA-112-500, Emergency Environmental Monitoring

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RS1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
- 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. Readings on **ANY** Table R1 Effluent Monitor > **Table R1 value** for **≥ 15 minutes**.

**OR**

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

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

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RS1 (cont)**

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>Site Area Emergency</b>
<b>Main Stack (RI-0-17-050B Common)</b>	5.57 E+08 uCi/sec
<b>Vent Stack (RI-2979B Unit 2 or RI-3979B Unit 3)</b>	1.60 E+07 uCi/sec

**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 mRem while the 500 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Escalation of the emergency classification level would be via IC RG1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AS1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station
4. EP-AA-112-500, Emergency Environmental Monitoring

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
- 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. Readings on **ANY** Table R1 Effluent Monitor > **Table R1 value** for **≥ 15 minutes**.

**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 **EITHER** of the following at or beyond the site boundary

a. **10 mRem TEDE** for **60 minutes** of exposure

**OR**

b. **50 mRem CDE Thyroid** for **60 minutes** of exposure

**OR**

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA1 (cont)**

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

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>Alert</b>
<b>Main Stack</b> (RI-0-17-050B Common)	5.57 E+07 uCi/sec
<b>Vent Stack</b> (RI-2979B Unit 2 or RI-3979B Unit 3)	1.60 E+06 uCi/sec

**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 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 mRem while the 50 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Escalation of the emergency classification level would be via IC RU1

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AA1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station
4. EP-EAL-0614 Revision 0 Peach Bottom Criteria for Choosing Radiological Liquid Effluent EAL Threshold Values

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU1**

**Initiating Condition:**

Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, 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.
- 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** of the following effluent monitors **> 2 times alarm setpoint** established by a current radioactive release discharge permit for **≥ 60 minutes**.

- Radwaste Discharge Effluent Monitor (RI-0-17-350)

**OR**

- Discharge Permit specified monitor

**OR**

2. Readings on **ANY** Table R1 Effluent Monitor **> Table R1 value** for **≥ 60 minutes**:

**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**.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU1 (cont)**

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

<b>Table R1 – Effluent Monitor Thresholds</b>	
<b>Release Path</b>	<b>Unusual Event</b>
<b>Main Stack</b> (RI-0-17-050B Common)	6.36 E+05 uCi/sec
<b>Main Stack</b> (RI-0-17-050A Common)	6.36 E+05 uCi/sec
<b>Vent Stack</b> (RI-2979B Unit 2 or RI-3979B Unit 3)	1.82 E+04 uCi/sec
<b>Vent Stack</b> (RI-2979A Unit 2 or RI-3979A Unit 3)	1.82 E+04 uCi/sec

**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.

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**

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).

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU1 (cont)**

**Basis (cont):**

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 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**

This EAL addresses normally occurring continuous radioactivity releases from monitored gaseous effluent pathways.

**EAL #3 Basis**

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 RA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AU1
2. Peach Bottom ODCM
3. EP-EAL-0607 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Peach Bottom Atomic Power Station

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RG2**

**Initiating Condition:**

Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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

Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for **60 minutes** or longer.

**Basis:**

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to a prolonged uncover of spent fuel. This condition will lead to fuel damage and a radiological release to the environment.

It is recognized that this IC would likely not be met until well after another General Emergency IC was met; however, it is included to provide classification diversity.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AG2

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RS2**

**Initiating Condition:**

Spent fuel pool level at (site-specific Level 3 description).

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

Lowering of spent fuel pool level to (site-specific Level 3 value).

**Basis:**

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to IMMEDIATE fuel damage. This condition entails major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

It is recognized that this IC would likely not be met until well after another Site Area Emergency IC was met; however, it is included to provide classification diversity.

Escalation of the emergency classification level would be via IC RG1 or RG2.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AS2

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA2**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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 R2 Radiation Monitor reading **>1000 mRem/hr.**  
**OR**
3. Lowering of spent fuel pool level to (site specific Level 2 value).

<b>Table R2 Refuel Floor ARM's</b>
<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>

**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. 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.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA2 (cont)**

**Basis (cont):**

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.

**EAL #1 Basis**

This EAL escalates from RU2 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. If available, video cameras may allow remote observation. 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 a 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.

**EAL #2 Basis**

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).

**EAL #3 Basis:**

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 would be based on either Recognition Category R or C ICs.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA2 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AA2
2. ON-124, Fuel Floor and Fuel Handling Problems
3. P-S-43, Radiation Monitoring System
4. ARC 003-00C214 B-4, Refueling Floor Area Hi Radiation
5. ARC 20C075 C-1, Fuel Storage Pool Hi Radiation

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU2**

**Initiating Condition:**

UNPLANNED loss of water level above irradiated fuel.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by **ANY** of the following:
  - Refueling Cavity water level < **458 inches** on Shutdown/Refuel Range indicator LI-2(3)-2-3-86 or PR/FR-2(3)-06-097.
  - OR**
  - Spent Fuel Pool level < **232 feet 3 inches** plant elevation.
  - OR**
  - Indication or report of a drop in water level in the REFUELING PATHWAY.

**AND**

- b. UNPLANNED Area Radiation Monitor reading rise on one or more radiation monitors in Table R2.

<b>Table R2 Refuel Floor ARM's</b>
<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU2 (cont)**

**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.

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 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 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 a rise 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 rise 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 RA2.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AU2
2. Technical Specifications 3.9.6, Reactor Pressure Vessel (RPV) Water Level
3. ON-124, Fuel Floor and Fuel Handling Problems
4. P-S-43, Radiation Monitoring System
5. ARC 003-00C214 B-4, Refueling Floor Area Hi Radiation
6. ARC 20C075 C-1, Fuel Storage Pool Hi Radiation
7. GP-6, Refueling Operations

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA3**

**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, D

**Emergency Action Level (EAL):**

**Note:**

- If the equipment in the room or area listed in Table R4 was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.
- Dose rate > 15 mR/hr in **ANY** of the following Table R3 areas:

<b>Table R3 Areas Requiring Continuous Occupancy</b>
<ul style="list-style-type: none"> <li>• Main Control Room</li> <li>• Central Alarm Station – (by survey)</li> </ul>

**OR**

- UNPLANNED event results in radiation levels that prohibit or significantly impede access to **ANY** of the following Table R4 plant rooms or areas:

<b>Table R4 Areas with Entry Related Mode Applicability</b>	
<b>Area of concern</b>	<b>Entry Related Mode Applicability</b>
<b>Reactor Building</b>	Modes 3, 4 and 5
135' all areas	

**RECOGNITION CATEGORY**  
**ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA3 (cont)**

**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. 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 raised radiation levels and determine if another IC may be applicable.

Assuming all plant equipment is operating as designed, normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table R4 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. 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 procedures, requiring use of non-routine protective equipment, requesting an 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 rise occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RA3 (cont)**

**Basis (cont):**

- 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 R, C or F ICs.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, AA3
2. FSAR Section describing Class I structures
3. Appendix R Analysis defining Safe Shutdown Area
4. P-S-43, Radiation Monitoring System
5. T-300, Fire Guides
6. SO 10.1.B-2(3), "Residual Heat Removal System Shutdown Cooling Mode Manual Start"

**RECOGNITION CATEGORY  
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

**RU3****Initiating Condition:**

Reactor coolant activity greater than Technical Specification allowable limits.

**Operating Mode Applicability:**

1, 2, 3

**Emergency Action Level (EAL):**

1. Air Ejector discharge radiation monitor RIS-2(3)-17-150 A/B **Hi-Hi** alarm.

**OR**

2. Specific coolant activity > **4.0 uCi/gm** Dose equivalent I-131.

**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.

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

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU3
2. Technical Specifications 3.4.6, RCS Specific Activity
3. Technical Specifications 3.7.5, Main Condenser Offgas
4. DBD P-S-30, Offgas System
5. ARC 218 20C210 E-1, Air Ejector Discharge Radiation High-High

**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

**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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FS1**

**Initiating Condition:**

Loss or Potential Loss of ANY two barriers.

**Operating Mode Applicability:**

1, 2, 3

**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-2

**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

**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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION****FC1****Initiating Condition:**

RCS Activity

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

Coolant activity &gt; 300 uCi/gm Dose Equivalent I-131.

**Basis:**

This threshold indicates that RCS radioactivity concentration is greater than 300  $\mu\text{Ci/gm}$  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.

There is no Potential Loss threshold associated with RCS Activity.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC2****Initiating Condition:**

RPV Water Level

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. Plant conditions indicate Primary Containment flooding is required.

POTENTIAL LOSS

2. RPV water level **cannot** be restored and maintained **> -172 inches** (TAF).

**OR**

- RPV water level **cannot** be determined.

**Basis:****Loss Threshold #1 Basis**

The Loss threshold represents the EOP requirement for primary containment flooding. This is identified in the BWROG EOPs/SAMPs when the phrase, "Primary Containment Flooding Is Required," appears. Since a site-specific RPV water level is not specified here, the Loss threshold phrase, "Primary containment flooding required," also accommodates the EOP need to flood the primary containment when RPV water level cannot be determined and core damage due to inadequate core cooling is believed to be occurring.

**Potential Loss Threshold #2 and #3 Basis**

This water level corresponds to the top of the active fuel and is used in the EOPs to indicate a challenge to core cooling.

The RPV water level threshold is the same as RCS Barrier RC2 Loss threshold. Thus, this threshold indicates a Potential Loss of the Fuel Clad barrier and a Loss of the RCS barrier that appropriately escalates the emergency classification level to a Site Area Emergency.

This threshold is considered to be exceeded when, as specified in the site-specific EOPs, RPV water level cannot be restored and maintained above the specified level following depressurization of the RPV (either manually, automatically or by failure of the RCS barrier) or when procedural guidance or a lack of low pressure RPV injection sources preclude Emergency RPV depressurization. EOPs allow the operator a wide choice of RPV injection sources to consider when restoring RPV water level to within prescribed limits. EOPs also specify depressurization of the RPV in order to facilitate

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC2 (cont)****Basis (cont):**

RPV water level control with low-pressure injection sources. In some events, elevated RPV pressure may prevent restoration of RPV water level until pressure drops below the shutoff heads of available injection sources. Therefore, this Fuel Clad barrier Potential Loss is met only after either: 1) the RPV has been depressurized, or required emergency RPV depressurization has been attempted, giving the operator an opportunity to assess the capability of low-pressure injection sources to restore RPV water level or 2) no low pressure RPV injection systems are available, precluding RPV depressurization in an attempt to minimize loss of RPV inventory.

The term "cannot be restored and maintained above" means the value of RPV water level is not able to be brought above the specified limit (top of active fuel). The determination requires an evaluation of system performance and availability in relation to the RPV water level value and trend. A threshold prescribing declaration when a threshold value *cannot* be restored and maintained above a specified limit does not require immediate action simply because the current value is below the top of active fuel, but does not permit extended operation below the limit; the threshold must be considered reached as soon as it is apparent that the top of active fuel cannot be attained

Entry into the "Steam Cooling" leg of the EOP's would be an example of an inability to "restore and maintain" level above TAF resulting in this threshold being met.

In high-power ATWS/failure to scram events, EOPs may direct the operator to deliberately lower RPV water level in order to reduce reactor power. Although such action is a challenge to core cooling and the Fuel Clad barrier, the immediate need to reduce reactor power is the higher priority. For such events, ICs MA3 or MS3 will dictate the need for emergency classification.

Since the loss of ability to determine if adequate core cooling is being provided presents a significant challenge to the fuel clad barrier, a potential loss of the fuel clad barrier is specified.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-BAS INTRO, INTRODUCTION TO TRIPS AND SAMPS – BASES
3. T-101, RPV Control Bases
4. T-111, Level Restoration

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC5****Initiating Condition:**

Primary Containment Radiation

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

Drywell radiation monitor reading &gt; 9.55 E+02 R/hr.

**Basis:**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the primary containment, assuming that reactor coolant activity equals 300  $\mu\text{Ci/gm}$  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 RC5 Loss Threshold 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.

There is no Fuel Clad Barrier Potential Loss threshold associated with Primary Containment Radiation.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. Core Damage Assessment Methodology
3. ARC-005-00C226D-B-5, Unit 3 Containment Radiation Monitor Hi-Rad
4. DBD P-S-43, Radiation Monitoring System

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**FC7**

**Initiating Condition:**

Emergency Director Judgment.

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**

LOSS

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

POTENTIAL LOSS

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

**Basis:**

**Loss Threshold #1 Basis**

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

**Potential Loss Threshold #2 Basis**

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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC2**

**Initiating Condition:**

RPV Water Level

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. RPV water level **cannot** be restored and maintained **> -172 inches** (TAF).

**OR**

2. RPV water level **cannot** be determined.

**Basis:**

This water level corresponds to the Top of Active Fuel (TAF) and is used in the EOPs to indicate challenge to core cooling.

The RPV water level threshold is the same as Fuel Clad Barrier FC2 Potential Loss threshold. Thus, this threshold indicates a Loss of the RCS barrier and Potential Loss of the Fuel Clad barrier and that appropriately escalates the emergency classification level to a Site Area Emergency.

This threshold is considered to be exceeded when, as specified in the site-specific EOPs, RPV water level cannot be restored and maintained above the specified level following depressurization of the RPV (either manually, automatically or by failure of the RCS barrier) or when procedural guidance or a lack of low pressure RPV injection sources preclude Emergency RPV depressurization. EOPs allow the operator a wide choice of RPV injection sources to consider when restoring RPV water level to within prescribed limits. EOPs also specify depressurization of the RPV in order to facilitate RPV water level control with low-pressure injection sources. In some events, elevated RPV pressure may prevent restoration of RPV water level until pressure drops below the shutoff heads of available injection sources. Therefore, this RCS barrier Loss is met only after either: 1) the RPV has been depressurized, or required emergency RPV depressurization has been attempted, giving the operator an opportunity to assess the capability of low-pressure injection sources to restore RPV water level or 2) no low pressure RPV injection systems are available, precluding RPV depressurization in an attempt to minimize loss of RPV inventory.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC2 (cont)**

**Basis (cont):**

The term, "cannot be restored and maintained above," means the value of RPV water level is not able to be brought above the specified limit (top of active fuel). The determination requires an evaluation of system performance and availability in relation to the RPV water level value and trend. A threshold prescribing declaration when a threshold value *cannot* be restored and maintained above a specified limit does not require immediate action simply because the current value is below the top of active fuel, but does not permit extended operation beyond the limit; the threshold must be considered reached as soon as it is apparent that the top of active fuel cannot be attained.

Entry into the "Steam Cooling" leg of the EOP's would be an example of an inability to "restore and maintain" level above TAF resulting in this threshold being met.

In high-power ATWS/failure to scram events, EOPs may direct the operator to deliberately lower RPV water level in order to reduce reactor power. Although such action is a challenge to core cooling and the Fuel Clad barrier, the immediate need to reduce reactor power is the higher priority. For such events, ICs MA3 or MS3 will dictate the need for emergency classification.

There is no RCS Potential Loss threshold associated with RPV Water Level.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-BAS INTRO, INTRODUCTION TO TRIPS AND SAMPS – BASES
3. T-101, RPV Control Bases
4. T-111, Level Restoration

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC3****Initiating Condition:**

Primary Containment Pressure

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. Drywell pressure &gt;2.0 psig.

**AND**

2. Drywell pressure rise is due to RCS leakage

**Basis:**

The > 2.0 psig primary containment pressure is the Drywell high pressure setpoint which indicates a LOCA by automatically initiating ECCS.

The second threshold condition focuses the fission product barrier loss threshold on a failure of the RCS instead of the non-LOCA malfunctions that may adversely affect primary containment pressure. Pressures of this magnitude can be caused by non-LOCA events such as a loss of Drywell cooling or inability to control primary containment vent/purge.

The release of mass from the RCS due to the as-designed/expected operation of any relief valve does not warrant an emergency classification.

A stuck-open Safety Relief Valve (SRV) or SRV leakage is not considered either identified or unidentified leakage by Technical Specifications and, therefore, is not applicable to this EAL.

There is no Potential Loss threshold associated with Primary Containment Pressure.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-102, Primary Containment Control-Bases
3. T-101, RPV Control

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC4**

**Initiating Condition:**

RCS Leak Rate

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. UNISOLABLE Main Steam Line (MSL), HPCI, Feedwater, RWCU, or RCIC line break.

**OR**

2. Emergency RPV Depressurization is required.

POTENTIAL LOSS3. UNISOLABLE primary system leakage that results in **EITHER** of the following:a. Secondary Containment area temperature > **T-103 Alarm Setpoint.****OR**b. Secondary Containment radiation level > **T-103 Alarm Setpoint.****Basis:**

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

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

Classification of a system break over system leakage is based on information available to the Control Room from the event. Indications that should be considered are:

- Reports describing magnitude of steam or water release.
- Use of system high flow alarms / indications, if available,
- Significant changes in makeup requirements,
- Abnormal reactor water level changes in response to the event.

The use of the above indications provides the Control Room the bases to determine that the on going event is more significant than the indications that would be expected from system leakage and therefore should be considered a system break.

**Loss Threshold #1 Basis**

Large high-energy lines that rupture outside primary containment can discharge significant amounts of inventory and jeopardize the pressure-retaining capability of the RCS until they are isolated. If it is determined that the ruptured line cannot be promptly isolated, the RCS barrier Loss threshold is met.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC4 (cont)****Basis (cont):****Loss Threshold #2 Basis**

Emergency RPV Depressurization in accordance with the EOPs is indicative of a loss of the RCS barrier. If Emergency RPV Depressurization is performed, the plant operators are directed to open safety relief valves (SRVs) and keep them open. Even though the RCS is being vented into the torus, a Loss of the RCS barrier exists due to the diminished effectiveness of the RCS to retain fission products within its boundary.

**Potential Loss Threshold #3 Basis**

Potential loss of RCS based on primary system leakage outside the primary containment is determined from EOP temperature or radiation Max Normal Operating values in areas such as main steam line tunnel, RCIC, HPCI, etc., which indicate a direct path from the RCS to areas outside primary containment.

A Max Normal Operating value is the highest value of the identified parameter expected to occur during normal plant operating conditions with all directly associated support and control systems functioning properly.

The indicators reaching the threshold barriers and confirmed to be caused by RCS leakage from a primary system warrant an Alert classification. A primary system is defined to be the pipes, valves, and other equipment which connect directly to the RPV such that a reduction in RPV pressure will effect a decrease in the steam or water being discharged through an unisolated break in the system.

In general, multiple indications should be used to determine if a primary system is discharging outside Primary Containment. For example, a high area radiation condition does not necessarily indicate that a primary system is discharging into the Reactor Building since this may be caused by radiation shine from nearby steam lines or the movement of radioactive materials. Conversely, a high area radiation condition in conjunction with other indications (e.g. room flooding, high area temperatures, reports of steam in the Reactor Building, an unexpected rise in Feedwater flowrate, or unexpected Main Turbine Control Valve closure) may indicate that a primary system is discharging into the Reactor Building.

An UNISOLABLE leak which is indicated by Max Normal Operating values escalates to a Site Area Emergency when combined with Containment Barrier CT6 Loss Threshold #1 (after a containment isolation) and a General Emergency when the Fuel Clad Barrier criteria is also exceeded.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-103, Secondary Containment Control

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC5**

**Initiating Condition:**

Primary Containment radiation

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

Drywell radiation monitor reading &gt; 100R/hr.

**Basis:**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the primary containment, assuming that reactor coolant activity equals Technical Specification allowable limits. This value is lower than that specified for Fuel Clad Barrier FC5 Loss Threshold since it indicates a loss of the RCS Barrier only.

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

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. EP-EAL-0611, Criteria for Choosing Containment Radiation Monitor Reading Indicative of Loss of RCS Barrier

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**RC7**

**Initiating Condition:**

Emergency Director Judgment.

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**

LOSS

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

POTENTIAL LOSS

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

**Basis:**

**Loss Threshold #1 Basis**

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

**Potential Loss Threshold #2 Basis**

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-2

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT2****Initiating Condition:**

RPV Water Level

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS

Plant conditions indicate Primary Containment flooding is required.

**Basis:**

The Potential Loss threshold is identical to the Fuel Clad Barrier FC2 Loss threshold RPV Water Level. The Potential Loss requirement for Primary Containment Flooding indicates adequate core cooling cannot be restored and maintained and that core damage is possible. BWR EOPs/SAMPs specify the conditions that require primary containment flooding. When primary containment flooding is required, the EOPs are exited and SAMPs are entered. Entry into SAMPs is a logical escalation in response to the inability to restore and maintain adequate core cooling.

PRA studies indicate that the condition of this Potential Loss threshold could be a core melt sequence which, if not corrected, could lead to RPV failure and increased potential for primary containment failure. In conjunction with the RPV water level Loss thresholds in the Fuel Clad and RCS barrier columns, this threshold results in the declaration of a General Emergency.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-111, Level Restoration (LR)- Bases
3. T-116, RPV Flooding - Bases
4. T-117, Level/Power Control – Bases
5. TRIP/SAMP Curves, Tables, And Limits – Bases
6. T-BAS (INTRO), Introduction To Trips And Samps - Bases

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT3****Initiating Condition:**

Primary Containment Conditions

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. UNPLANNED rapid drop in Drywell pressure following primary containment pressure rise.

**OR**

2. Drywell pressure response **not** consistent with LOCA conditions.

POTENTIAL LOSS

3. Drywell pressure > **56 psig** and rising.

**OR**

4. a. Drywell or Torus Hydrogen concentration > **6%**.

**AND**

b. Drywell or Torus Oxygen concentration > **5%**.

**OR**

5. Heat Capacity Limit (T-102 Curve T/T-1) exceeded.

**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.

**Loss Threshold #1 and #2 Basis**

Rapid UNPLANNED loss of primary containment pressure (i.e., not attributable to Drywell spray or condensation effects) following an initial pressure rise indicates a loss of primary containment integrity. Primary containment pressure should rise as a result of mass and energy release into the primary containment from a LOCA. Thus, primary containment pressure not increasing under these conditions indicates a loss of primary containment integrity.

These thresholds rely on operator recognition of an unexpected response for the condition and therefore a specific value is not assigned. The unexpected (UNPLANNED) response is important because it is the indicator for a containment bypass condition. A pressure suppression bypass path would **not** be an indication of a containment breach.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT3 (cont)**

**Basis (cont):**

**Potential Loss Threshold #3 Basis**

The threshold pressure is the primary containment internal design pressure. Structural acceptance testing demonstrates the capability of the primary containment to resist pressures greater than the internal design pressure. A pressure of this magnitude is greater than those expected to result from any design basis accident and, thus, represent a Potential Loss of the Containment barrier.

**Potential Loss Threshold #4 Basis**

If hydrogen concentration reaches or exceeds the lower flammability limit, as defined in plant EOPs, in an oxygen rich environment, a potentially explosive mixture exists. If the combustible mixture ignites inside the primary containment, loss of the Containment barrier could occur.

**Potential Loss Threshold #5 Basis**

The HCTL is a function of RPV pressure, torus temperature and torus water level. It is utilized to preclude failure of the containment and equipment in the containment necessary for the safe shutdown of the plant and therefore, the inability to maintain plant parameters below the limit constitutes a potential loss of containment.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-BAS INTRO, INTRODUCTION TO TRIPS AND SAMPS – BASES
3. UFSAR Section 5.2.4, Primary Containment Safety Evaluation
4. T-102 Primary Containment Control-Bases
5. DBD P-T-12, Design Basis Accidents, Transients and Events
6. DBD P-T-02, Containment, Section 3.2.14

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT5****Initiating Condition:**

Primary Containment Radiation

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSSDrywell radiation monitor reading > **2.20 E+03 R/hr.****Basis:**

There is no Loss threshold associated with Primary Containment Radiation.

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the primary 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-2
2. Core Damage Assessment Methodology
3. ARC-005-00C226D-B-5 Unit 3 Containment Radiation Monitor Hi-Rad
4. DBD P-S-43, Radiation Monitoring System

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT6****Initiating Condition:**

Primary Containment Isolation Failure

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**LOSS

1. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal.

**OR**

2. Intentional Primary Containment venting/purging per EOPs or SAMPs due to accident conditions.

**OR**

3. UNISOLABLE primary system leakage that results in **EITHER** of the following:

a. Secondary Containment area temperature > **T-103 Action Level**.

**OR**

b. Secondary Containment area radiation level > **T-103 Action Level**.

**Basis:**

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

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

These thresholds address incomplete containment isolation that allows an UNISOLABLE direct release to the environment.

**Loss Threshold #1 Basis**

The use of the modifier "direct" in defining the release path discriminates against release paths through interfacing liquid systems or minor release pathways, such as instrument lines, not protected by the Primary Containment Isolation System (PCIS). Leakage into a closed system is to be considered only if the closed system is breached and thereby creates a significant pathway to the environment. Examples include unisolable Main Steamline, HPCI or RCIC steamline breaks, unisolable RWCU system breaks, and unisolable containment atmosphere vent paths.

Examples of "downstream pathway to the environment" could be through the Turbine/Condenser, or direct release to the Turbine or Reactor Building.

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

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT6 (cont)**

**Basis (cont):**

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.

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

**Loss Threshold #2 Basis**

EOPs may direct primary containment isolation valve logic(s) to be intentionally bypassed, even if offsite radioactivity release rate limits will be exceeded. Under these conditions with a valid primary containment isolation signal, the containment should also be considered lost if primary containment venting is actually performed.

Intentional venting of primary containment for primary containment pressure or combustible gas control to the secondary containment and/or the environment is a Loss of the Containment. Venting for primary containment pressure control when not in an accident situation (e.g., to control pressure below the Drywell high pressure scram setpoint) does not meet the threshold condition.

**Loss Threshold #3 Basis**

The Max Safe Operating Temperature and the Max Safe Operating Radiation Level are each the highest value of these parameters at which neither: (1) equipment necessary for the safe shutdown of the plant will fail, nor (2) personnel access necessary for the safe shutdown of the plant will be precluded. EOPs utilize these temperatures and radiation levels to establish conditions under which RPV depressurization is required.

The temperatures and radiation levels should be confirmed to be caused by RCS leakage from a primary system. A primary system is defined to be the pipes, valves, and other equipment which connect directly to the RPV such that a reduction in RPV pressure will effect a decrease in the steam or water being discharged through an unisolated break in the system.

In general, multiple indications should be used to determine if a primary system is discharging outside Primary Containment. For example, a high area radiation condition does not necessarily indicate that a primary system is discharging into the Reactor Building since this may be caused by radiation shine from nearby steam lines or the movement of radioactive materials. Conversely, a high area radiation condition in conjunction with other indications (e.g. room flooding, high area temperatures, reports of steam in the Reactor Building, an unexpected rise in Feedwater flowrate, or unexpected Main Turbine Control Valve closure) may indicate that a primary system is discharging into the Reactor Building.

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT6 (cont)**

**Basis (cont):**

In combination with RCS Barrier RC4 Potential Loss Threshold #3 this threshold would result in a Site Area Emergency.

There is no Potential Loss threshold associated with Primary Containment Isolation Failure.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, Table 9-F-2
2. T-103 Secondary Containment Control
3. T-102 Primary Containment Control
4. T-200-3 Primary Containment Venting

**RECOGNITION CATEGORY  
FISSION PRODUCT BARRIER DEGRADATION**

**CT7**

**Initiating Condition:**

Emergency Director Judgment.

**Operating Mode Applicability:**

1, 2, 3

**Fission Product Barrier (FPB) Threshold:**

LOSS

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

POTENTIAL LOSS

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

**Basis:**

**Loss Threshold #1 Basis**

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

**Potential Loss Threshold #2 Basis**

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-2

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MG1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

1 Loss of **ALL** offsite AC power to unit 4 KV Safeguards Buses.

**AND**

2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.

**AND**

3. **EITHER** of the following:

a. Restoration of at least one unit 4KV safeguards Bus in **< 2 hours is not** likely.

**OR**

b. RPV water level **cannot** be restored and maintained **> -195 inches**.

**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 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 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

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MG1 (cont)**

**Basis (cont):**

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 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. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. T-101 RPV Control
6. SE-11, LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MS1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

1. Loss of **ALL** offsite AC Power to unit 4KV Safeguards Buses.

**AND**

2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.

**AND**

3. Failure to restore power to at least one unit 4KV Safeguards 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.

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

Escalation of the emergency classification level would be via ICs RG1, FG1, MG1, or MG2.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MS1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SS1
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.
1. AC power capability to unit 4KV Safeguards Buses reduced to only one of the following power sources for  $\geq 15$  minutes.
    - 2 Emergency Auxiliary Transformer (0AX04)
    - 3 Emergency Auxiliary Transformer (0BX04)
    - E1 Diesel Generator
    - E2 Diesel Generator
    - E3 Diesel Generator
    - E4 Diesel Generator

**AND**

2. **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 MU1.

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.

- A loss of all offsite power with a concurrent failure of all but one emergency power source (e.g., an onsite diesel generator).

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MA1 (cont)**

**Basis (cont):**

- 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 MS1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SA1
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. DBD P-T-13, Station Blackout
6. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU1****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

Loss of **ALL** offsite AC power capability to unit 4KV Safeguards Buses for **≥15 minutes**.

**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.

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 MA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU1
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. DBD P-T-13, Station Blackout
6. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MG2****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

1. Loss of **ALL** offsite AC power to unit 4KV safeguards Buses.  
**AND**
2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.  
**AND**
3. Voltage is **< 107.5 VDC** on unit 125 VDC battery buses 2(3)0D021, 2(3)0D022, 2(3)0D023, and 2(3)0D024.  
**AND**
4. **ALL** AC and Vital DC power sources have been lost for **≥ 15 minutes**.

**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 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 all EAL conditions are met.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MG2 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SG8
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. DBD P-S-05, 4KV System
5. DBD P-S-01A, 125/250 Vdc Station Batteries Including 125 Vdc Batteries & Chargers, Table T3.2-1, MCCs, and DC Distribution
6. SE-13 LOSS OF A 125 OR 250 VDC SAFETY RELATED BUS
7. ARC-220-20C209R H-3, 2B DC Power Panel Lo Voltage
8. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MS2****Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

Voltage is **<107.5 VDC** on 125 VDC battery buses 2(3)0D021, 2(3)0D022, 2(3)0D023, and 2(3)0D024 for **≥15 minutes**.

**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 RG1, FG1 or MG2.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SS8
2. DBD P-S-01A, 125/250 Vdc Station Batteries Including 125 Vdc Batteries & Chargers, Table T3.2-1, MCCs, and DC Distribution
3. SE-13, LOSS OF A 125 OR 250 VDC SAFETY RELATED BUS
4. ARC-220-20C209R H-3, 2B DC Power Panel Lo Voltage

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MS3****Initiating Condition:**

Inability to shutdown the reactor causing a challenge to RPV water level or RCS heat removal.

**Operating Mode Applicability:**

1, 2

**Emergency Action Level (EAL):**

1. Automatic scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

2. **ALL** manual / ARI actions to shutdown the reactor have been unsuccessful as indicated by Reactor Power > 4%.

**AND**

3. **EITHER** of the following conditions exist:

- RPV water level **cannot** be restored and maintained > -195 inches

**OR**

- Heat Capacity Limit (T-102 Curve T/T-1) exceeded.

**Basis:**

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor scram 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, 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.

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 RG1 or FG1.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MS3 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SS5
2. T-117, Level/Power Control
3. T-101, RPV Control
4. T-102, Primary Containment Control

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA3****Initiating Condition:**

Automatic or manual scram 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. Automatic or manual scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

2. Manual / ARI actions taken at the Reactor Console are **not** successful in shutting down the reactor as indicated by Reactor Power > 4%.

**Basis:**

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor scram that results in a reactor shutdown, and subsequent operator manual actions taken at the reactor 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 consoles since this event entails a significant failure of the RPS.

A manual action at the reactor 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 scram. 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 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 consoles".

Taking the Reactor Mode Switch to Shutdown is considered to be a manual scram action.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA3 (cont)****Basis (cont):**

The plant response to the failure of an automatic or manual reactor scram 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 RPV water level or RCS heat removal safety functions, the emergency classification level will escalate to a Site Area Emergency via IC MS3. Depending upon plant responses and symptoms, escalation is also possible via IC FS1. Absent the plant conditions needed to meet either IC MS3 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. T-117, Level/Power Control
3. T-101, RPV Control

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU3****Initiating Condition:**

Automatic or manual scram 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. Automatic scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

- b. Subsequent manual / ARI action taken at the Reactor Console is successful in shutting down the reactor.

**OR**

2. a. Manual scram did **not** shutdown the reactor as indicated by Reactor Power > 4%.

**AND**

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

1. Subsequent manual / ARI action taken at the Reactor Console is successful in shutting down the reactor.

**OR**

2. Subsequent automatic / ARI scram 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 scram that results in a reactor shutdown, and either a subsequent operator manual action taken at the reactor consoles or an automatic scram is successful in shutting 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.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU3 (cont)****Basis (cont):****EAL #1 Basis**

Following the failure on an automatic reactor scram, operators will promptly initiate manual actions at the reactor consoles to shutdown the reactor (e.g., initiate a manual reactor scram). 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 reactor consoles to shutdown the reactor (e.g., initiate a manual reactor scram/ARI using a different switch). Depending upon several factors, the initial or subsequent effort to manually scram the reactor, or a concurrent plant condition, may lead to the generation of an automatic reactor scram signal. If a subsequent manual or automatic scram/ARI 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 reactor 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 scram). 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 reactor consoles".

Taking the Reactor Mode Switch to Shutdown is considered to be a manual scram action.

The plant response to the failure of an automatic or manual reactor scram 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 reactor consoles are also unsuccessful in shutting down the reactor, then the emergency classification level will escalate to an Alert via IC MA3. Depending upon the plant response, escalation is also possible via IC FA1. Absent the plant conditions needed to meet either IC MA3 or FA1, an Unusual Event declaration is appropriate for this event.

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

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU3 (cont)**

**Basis (cont):**

Should a reactor scram 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 scram and the RPS fails to automatically shutdown the reactor, then this IC and the EALs are applicable, and should be evaluated.
- If the signal generated as a result of plant work does not cause a plant transient but should have generated an RPS scram signal and the scram 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. T-117, Level/Power Control

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MA4**

**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

**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.
1. UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥15 minutes**.

<b>Table M1 – Control Room Parameters</b>
<ul style="list-style-type: none"> <li>• Reactor Power</li> <li>• RPV Water Level</li> <li>• RPV Pressure</li> <li>• Drywell Pressure</li> <li>• Torus Level</li> <li>• Torus Temperature</li> </ul>

**AND**

2. **ANY** Table M2 transient in progress.

<b>Table M2 – Significant Transients</b>
<ul style="list-style-type: none"> <li>• Automatic or Manual Runback &gt;25% thermal reactor power</li> <li>• Electrical Load Rejection &gt;25% full electrical load</li> <li>• Reactor Scram</li> <li>• ECCS Actuation</li> <li>• Thermal Power oscillations &gt; 10%</li> </ul>

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA4 (cont)****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 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, RPV water level and RCS heat removal. The loss of the ability to determine one or more 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 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 RPV water 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 RS1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SA2

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU4**

**Initiating Condition:**

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

**Operating Mode Applicability:**

1, 2, 3

**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.

UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥ 15 minutes**.

<b>Table M1 – Control Room Parameters</b>
<ul style="list-style-type: none"> <li>• Reactor Power</li> <li>• RPV Water Level</li> <li>• RPV Pressure</li> <li>• Drywell Pressure</li> <li>• Torus Level</li> <li>• Torus Temperature</li> </ul>

**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 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.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU4 (cont)****Basis (cont):**

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 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 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 MA4.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU2

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA5****Initiating Condition:**

Hazardous event affecting a SAFETY SYSTEM required for the current operating mode.

**Operating Mode Applicability:**

1, 2, 3

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

- If it is determined that the conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.
1. The occurrence of **ANY** of the following hazardous events:
    - 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

**AND****2. EITHER** of the following:

- 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.

**OR**

- b. The event has caused **VISIBLE DAMAGE** to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

**Basis:**

**FIRE:** Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

**EXPLOSION:** A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such events may require a post-event inspection to determine if the attributes of an explosion are present.

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MA5 (cont)****Basis (cont):**

**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.

**VISIBLE DAMAGE:** Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

**EAL #2.a Basis**

This EAL addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

**EAL #2.b Basis**

This EAL addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, as well as damage to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC FS1 or RS1.

If the EAL conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 SA9
2. SE-5, Earthquake - Bases
3. SE-4, Flood – Bases
4. DBD P-T-09, Internal Hazards

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU6****Initiating Condition:**

RCS leakage for 15 minutes or longer.

**Operating Mode Applicability:**

1, 2, 3

**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.

1. RCS unidentified or pressure boundary leakage in the Drywell > **10 gpm** for **≥ 15 minutes**.

**OR**

2. RCS identified leakage in the Drywell >**25 gpm** for **≥ 15 minutes**.

**OR**

3. Leakage from the RCS to a location outside the Drywell >**25 gpm** for **≥ 15 minutes**.

**Basis:**

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

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

This IC addresses RCS leakage which may be a precursor to a more significant event. In this case, RCS leakage has been detected and operators, following applicable procedures, have been unable to promptly isolate the leak. This condition is considered to be a potential degradation of the level of safety of the plant.

**EAL #1 and EAL #2 Basis**

These EALs are focused on a loss of mass from the RCS due to "unidentified leakage", "pressure boundary leakage" or "identified leakage" (as these leakage types are defined in the plant Technical Specifications).

**EAL #3 Basis**

This EAL addresses a RCS mass loss caused by an UNISOLABLE leak through an interfacing system.

These EALs thus apply to leakage into the containment, a secondary-side system or a location outside of containment.

The leak rate values for each EAL were selected because they are usually observable with normal Control Room indications. Lesser values typically require time-consuming

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS****MU6 (cont)****Basis (cont):**

calculations to determine (e.g., a mass balance calculation). EAL #1 uses a lower value that reflects the greater significance of unidentified or pressure boundary leakage.

The release of mass from the RCS due to the as-designed/expected operation of any relief valve does not warrant an emergency classification.

A stuck-open Safety Relief Valve (SRV) or SRV leakage is not considered either identified or unidentified leakage by Technical Specifications and, therefore, is not applicable to this EAL.

The 15-minute threshold duration allows sufficient time for prompt operator actions to isolate the leakage, if possible.

Escalation of the emergency classification level would be via ICs of Recognition Category R or F.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU4
2. Technical Specifications 3.4.4, RCS Operational Leakage
3. UFSAR 4.10.3, Nuclear System Leakage Detection and Leakage Rate Limits
4. UFSAR 5.2.5, Primary Containment – Inspection and Testing
5. ST-O-020-560-2/3, Reactor Coolant Leakage Test
6. DBD P-S-34 Radwaste System, 3.3.1.3.1 Drywell Floor Drain Sump Operation
7. DBD P-S-34 Radwaste System, 3.3.1.3.2 Drywell Equipment Drain Sump Operation

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU7**

**Initiating Condition:**

Loss of all On-site or Off-site communications capabilities.

**Operating Mode Applicability:**

1, 2, 3

**Emergency Action Level (EAL):**

1. Loss of **ALL** Table M3 **Onsite** communications capability affecting the ability to perform routine operations.  
**OR**
2. Loss of **ALL** Table M3 **Offsite** communication capability affecting the ability to perform offsite notifications.  
**OR**
3. Loss of **ALL** Table M3 **NRC** communication capability affecting the ability to perform NRC notifications.

<b>Table M3 – Communications Capability</b>			
<b>System</b>	<b>Onsite</b>	<b>Offsite</b>	<b>NRC</b>
Station Radio System	X		
Plant Public Address (PA)	X		
OMNI System	X	X	
Station Phones	X	X	X
Satellite Phones		X	X
NARS		X	
HPN		X	X
ENS		X	X

**Basis:**

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points, individuals being sent to offsite locations, etc.).

**RECOGNITION CATEGORY  
SYSTEM MALFUNCTIONS**

**MU7 (cont)**

**Basis (cont):**

**EAL #1Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

**EAL #2 Basis**

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MA-114-100-F-01, State/Local Event Notification Form.

**EAL #3 Basis**

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, SU6
2. UFSAR Section 10.21, Communication Systems
3. EP-MA-124-1001 Facility Inventories and Equipment Tests
4. NE-CG-400-19 Lighting and Communication Drawings

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

4, 5, D

**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.

1. Loss of **ALL** offsite AC power to unit 4KV Safeguards Buses.

**AND**

2. Failure of E1, E2, E3, and E4 Emergency Diesel Generators to supply power to unit 4KV Safeguards Buses.

**AND**

3. Failure to restore power to at least one unit 4KV Safeguards 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.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as a Site Area Emergency because of the increased time available to restore an emergency bus to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition represents an actual or potential substantial degradation of the level of safety of the plant.

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

Escalation of the emergency classification level would be via IC CS6 or RS1.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA2
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. UFSAR Section 8.5.3, Standby AC Power Supply and Distribution
5. DBD P-S-05, 4KV System
6. DBD P-T-13, Station Blackout
7. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU1**

**Initiating Condition:**

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

**Operating Mode Applicability:**

4, 5, D

**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.

1. AC power capability to unit 4KV Safeguards Buses reduced to only one of the following power sources for **≥ 15 minutes**.

- 2 Emergency Auxiliary Transformer (0AX04)
- 3 Emergency Auxiliary Transformer (0BX04)
- E1 Diesel Generator
- E2 Diesel Generator
- E3 Diesel Generator
- E4 Diesel Generator

**AND**

2. **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.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as an Alert because of the increased time available to restore another power source to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition is considered to be a potential degradation of the level of safety of the plant.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU1 (cont)**

**Initiating Condition:**

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.

- 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.

The subsequent loss of the remaining single power source would escalate the event to an Alert in accordance with IC CA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6 CU2
2. UFSAR Section 8.4, Auxiliary Power Systems
3. UFSAR Figure 8.3.1, Transmission System
4. UFSAR Section 8.5.3, Standby AC Power Supply and Distribution
5. DBD P-S-05, 4KV System
6. DBD P-T-13, Station Blackout
7. SE-11 LOSS OF OFF-SITE POWER - BASES

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA2**

**Initiating Condition:**

Hazardous event affecting SAFETY SYSTEM required for the current operating mode.

**Operating Mode Applicability:**

4, 5

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

- If it is determined that the conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

1. The occurrence of **ANY** of the following hazardous events:

- 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

**AND**

2. **EITHER** of the following:

- 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.

**OR**

- b. The event has caused **VISIBLE DAMAGE** to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

**Basis:**

**FIRE:** Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CA2 (cont)**

**Basis (cont):**

EXPLOSION: A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such events may require a post-event inspection to determine if the attributes of an explosion are present.

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.

VISIBLE DAMAGE: Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

**EAL #2.a Basis**

Addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

**EAL #2.b Basis**

Addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, or to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC CS6 or RS1.

If the EAL conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA2 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA6

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU3**

**Initiating Condition:**

Loss of Vital DC power for 15 minutes or longer.

**Operating Mode Applicability:**

4, 5

**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.

Voltage is **< 107.5 VDC** on required 125 VDC battery buses 2(3)0D021, 2(3)0D022 , 2(3)0D023 , and 2(3)0D024 for **≥ 15 minutes**.

**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 operable SAFETY SYSTEMS when the plant is in the cold shutdown or refueling mode. In these modes, the core decay heat load has been significantly reduced, and coolant system temperatures and pressures are lower; these conditions rise the time available to restore a vital DC bus to service. Thus, this condition is considered to be a potential degradation of the level of safety of the plant.

As used in this EAL, "required" means the Vital DC buses necessary to support operation of the in-service, or operable, train or trains of SAFETY SYSTEM equipment. For example, if Train A is out-of-service (inoperable) for scheduled outage maintenance work and Train B is in-service (operable), then a loss of Vital DC power affecting Train B would require the declaration of an Unusual Event. A loss of Vital DC power to Train A would not warrant an emergency classification.

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

Depending upon the event, escalation of the emergency classification level would be via IC CA6 or CA5, or an IC in Recognition Category R.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU3 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CU4
2. DBD P-S-01A, 125/250 Vdc Station Batteries Including 125 Vdc Batteries & Chargers, Table T3.2-1, MCCs, and DC Distribution
3. SE-13, LOSS OF A 125 OR 250 VDC SAFETY RELATED BUS
4. ARC-220-20C209R H-3, 2B DC Power Panel Lo Voltage

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU4**

**Initiating Condition:**

Loss of all onsite or offsite communications capabilities.

**Operating Mode Applicability:**

4, 5, D

**Emergency Action Level (EAL):**

1. Loss of **ALL** Table C1 **Onsite** communications capability affecting the ability to perform routine operations.

**OR**

2. Loss of **ALL** Table C1 **Offsite** communication capability affecting the ability to perform offsite notifications.

**OR**

3. Loss of **ALL** Table C1 **NRC** communication capability affecting the ability to perform NRC notifications.

<b>Table C1 – Communications Capability</b>			
<b>System</b>	<b>Onsite</b>	<b>Offsite</b>	<b>NRC</b>
Station Radio System	X		
Plant Public Address (PA)	X		
OMNI System	X	X	
Station Phones	X	X	X
Satellite Phones		X	X
NARS		X	
HPN		X	X
ENS		X	X

**Basis:**

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points, individuals being sent to offsite locations, etc.).

**EAL #1 Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU4 (cont)**

**Basis (cont):**

**EAL #2 Basis**

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MA-114-100-F-01, State/Local Event Notification Form.

**EAL #3 Basis**

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CU5
2. UFSAR Section 10.21, Communication Systems
3. EP-MA-124-1001 Facility Inventories and Equipment Tests
4. NE-CG-400-19 Lighting and Communication Drawings

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA5**

**Initiating Condition:**

Inability to maintain the plant in cold shutdown.

**Operating Mode Applicability:**

4, 5

**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.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.

1. UNPLANNED rise in RCS temperature > 212°F for > **Table C2 duration**.

<b>Table C2 – RCS Heat-up Duration Thresholds</b>		
<b>RCS Status</b>	<b>Containment Closure Status</b>	<b>Heat-up Duration</b>
Intact	Not Applicable	60 minutes*
Not Intact	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, then EAL #1 is <u>not</u> applicable.		

**OR**

2. UNPLANNED RPV pressure rise > 10 psig as a result of temperature rise.

**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.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CA5 (cont)**

**Basis (cont):**

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, or steam line nozzle plugs, etc.).

This IC addresses conditions involving a loss of decay heat removal capability or an addition of heat to the RCS in excess of that which can currently be removed. Either condition represents an actual or potential substantial degradation of the level of safety of the plant.

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

The RCS Heat-up Duration Thresholds table addresses a rise in RCS temperature when CONTAINMENT CLOSURE is established but the RCS is not intact. The 20-minute criterion was included to allow time for operator action to address the temperature rise.

The RCS Heat-up Duration Thresholds table also addresses a rise in RCS temperature with the RCS intact. The status of CONTAINMENT CLOSURE is not crucial in this condition since the intact RCS is providing a high pressure barrier to a fission product release. The 60-minute time frame should allow sufficient time to address the temperature rise without a substantial degradation in plant safety.

Finally, in the case where there is a rise in RCS temperature, the RCS is not intact, and CONTAINMENT CLOSURE is not established, no heat-up duration is allowed (i.e., 0 minutes). This is because 1) the evaporated reactor coolant may be released directly into the Containment atmosphere and subsequently to the environment, and 2) there is reduced reactor coolant inventory above the top of irradiated fuel.

**EAL #2 Basis**

Provides a pressure-based indication of RCS heat-up.

Escalation of the emergency classification level would be via IC CS6 or RS1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA3
2. Technical Specification 3.6.1.1, Primary Containment
3. Technical Specification 3.6.4.1, Secondary Containment
4. DBD P-S-16, REACTOR INSTRUMENTATION SYSTEM
5. DBD P-S-19, RECIRCULATION SYSTEM
6. SE-11, ATTACHMENT C – INSTRUMENT LIST

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU5**

**Initiating Condition:**

UNPLANNED rise in RCS temperature

**Operating Mode Applicability:**

4, 5

**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.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.

1. UNPLANNED rise in RCS temperature > 212°F.

**OR**

2. Loss of the following for  $\geq 15$  minutes.

- **ALL** RCS temperature indications
- AND**
- **ALL** RPV water level indications

**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.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, or steam line nozzle plugs, etc.).

This IC addresses an UNPLANNED rise in RCS temperature above the Technical Specification cold shutdown temperature limit, or the inability to determine RCS temperature and level, represents a potential degradation of the level of safety of the plant. If the RCS is not intact and CONTAINMENT CLOSURE is not established during this event, the Emergency Director should also refer to IC CA5.

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CU5 (cont)**

**Basis (cont):**

EAL #1 involves a loss of decay heat removal capability, or an addition of heat to the RCS in excess of that which can currently be removed, such that reactor coolant temperature cannot be maintained below the cold shutdown temperature limit specified in Technical Specifications. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

During an outage, the level in the reactor vessel will normally be maintained above the reactor vessel flange. Refueling evolutions that lower water level below the reactor vessel flange are carefully planned and controlled. A loss of forced decay heat removal at reduced inventory may result in a rapid rise in reactor coolant temperature depending on the time after shutdown.

EAL #2 reflects a condition where there has been a significant loss of instrumentation capability necessary to monitor RCS conditions and operators would be unable to monitor key parameters necessary to assure core decay heat removal. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

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

Escalation to Alert would be via IC CA6 based on an inventory loss or IC CA5 based on exceeding plant configuration-specific time criteria.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CU3
2. T-102, Primary Containment Control – Bases
3. T-103, Secondary Containment Control – Bases
4. PBAPS 2/3 TRIP/SAMP CURVES, TABLES, & LIMITS – BASES
5. DBD P-S-16, REACTOR INSTRUMENTATION SYSTEM
6. DBD P-S-19, RECIRCULATION SYSTEM

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CG6**

**Initiating Condition:**

Loss of RPV inventory affecting fuel clad integrity with containment challenged.

**Operating Mode Applicability:**

4, 5

**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.

1. a. RPV water level < -172 inches (TAF) for  $\geq$  30 minutes.

**AND**

- b. **ANY** Containment Challenge Indication (Table C4)

**OR**

2. a. RPV water level cannot be monitored for  $\geq$  30 minutes.

**AND**

- b. Core uncover is indicated by **ANY** of the following:

- Table C3 indications of a sufficient magnitude to indicate core uncover.

**OR**

- **ANY** Table C5 Refuel Floor Area Radiation Monitor >3 R/hr.

**AND**

- c. **ANY** Containment Challenge Indication (Table C4)

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"> <li>• UNPLANNED floor or equipment sump level rise*</li> <li>• UNPLANNED Torus level rise*</li> <li>• UNPLANNED vessel make up rate rise</li> <li>• Observation of leakage or inventory loss</li> </ul>
*Rise in level is attributed to a loss of RPV inventory.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS  
CG6 (cont)**

Emergency Action Level (EAL) (cont):

<b>Table C4 – Containment Challenge Indications</b>
<ul style="list-style-type: none"> <li>• Primary Containment Hydrogen Concentration &gt; 6% and Oxygen &gt; 5%</li> <li>• UNPLANNED rise in containment pressure</li> <li>• CONTAINMENT CLOSURE <b>not</b> established*</li> <li>• Any Secondary Containment radiation monitor &gt; <b>T-103 Action Level</b></li> </ul>
<p>* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is <b>not</b> required.</p>

<b>Table C5 Refuel Floor ARM's</b>
<ul style="list-style-type: none"> <li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li> <li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li> <li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li> <li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li> </ul>

**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.

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.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CG6 (cont)**

**Basis (cont):**

This IC addresses the inability to restore and maintain reactor vessel level above the top of active fuel with containment challenged. This condition represents actual or IMMINENT substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guidelines (PAG) exposure levels offsite for more than the immediate site area.

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable.

With CONTAINMENT CLOSURE not established, there is a high potential for a direct and unmonitored release of radioactivity to the environment. If CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute time limit, then declaration of a General Emergency is not required.

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 challenge to Containment integrity.

In the early stages of a core uncover event, it is unlikely that hydrogen buildup due to a core uncover could result in an explosive gas mixture in containment. If all installed hydrogen gas monitors are out-of-service during an event leading to fuel cladding damage, it may not be possible to obtain a containment hydrogen gas concentration reading as ambient conditions within the containment will preclude personnel access. During periods when installed containment hydrogen gas monitors are out-of-service, operators may use the other listed indications to assess whether or not containment is challenged.

**EAL #1 Basis**

The 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

The inability to monitor RPV water level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CG6 (cont)**

**Basis (cont):**

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CG1
2. T-101, RPV Control
3. T-102 Primary Containment Control
4. T-103 Secondary Containment Control
5. Technical Specification 3.6.1.1, Primary Containment
6. Technical Specification 3.6.4.1, Secondary Containment
7. UFSAR Table 5.2-1, Primary Containment
8. EP-EAL-0501, Estimation of Radiation Monitor Readings Indicating Core Uncovery During Refuel
9. DBD P-T-02, Containment, Section 3.2.14
10. DBD P-S-20, Neutron Monitoring System

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CS6**

**Initiating Condition:**

Loss of RPV inventory affecting core decay heat removal capability.

**Operating Mode Applicability:**

4, 5

**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.
  
- 1. With CONTAINMENT CLOSURE not established, RPV water level < -160 inches.  
**OR**
- 2. With CONTAINMENT CLOSURE established, RPV water level < - 172 inches (TAF).  
**OR**
- 3. a. RPV water level cannot be monitored for  $\geq$  30 minutes  
**AND**  
b. Core uncover is indicated by **ANY** of the following:
  - Table C3 indications of a sufficient magnitude to indicate core uncover.
  - OR**
  - **ANY** Table C5 Refuel Floor Area Radiation Monitor >3 R/hr.

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"> <li>• UNPLANNED floor or equipment sump level rise*</li> <li>• UNPLANNED Torus level rise*</li> <li>• UNPLANNED vessel make up rate rise</li> <li>• Observation of leakage or inventory loss</li> </ul>
*Rise in level is attributed to a loss of RPV inventory.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CS6 (cont)**

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

<b>Table C5</b> <b>Refuel Floor ARM's</b>
<ul style="list-style-type: none"><li>• Steam Separator Pool, 234 ELEV, 3.7 (7.9)</li><li>• Refuel Slot, 234 ELEV, 3.8 (7.10)</li><li>• Fuel Pool, 234 ELEV, 3.9 (7.11)</li><li>• Refueling Bridge, 234 ELEV, 3.10 (7.12)</li></ul>

**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.

**CONTAINMENT CLOSURE:** The procedurally defined conditions or actions taken to secure containment (primary or secondary) and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

The lost inventory may be due to a RCS component failure, a loss of configuration control or prolonged boiling of reactor coolant. These conditions entail major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable. Outage/shutdown contingency plans typically provide for re-establishing or verifying CONTAINMENT CLOSURE following a loss of heat removal or RCS inventory control functions. The difference in the specified RCS/reactor vessel levels of EALs #1 and #2 reflect the fact that with CONTAINMENT CLOSURE established, there is a lower probability of a fission product release to the environment.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CS6 (cont)**

**Basis:**

In **EAL #3.a**, the 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

The inability to monitor RPV water level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

Escalation of the emergency classification level would be via IC CG6 or RG1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CS1
2. T-101, RPV Control
3. T-102 Primary Containment Control
5. Technical Specification 3.6.1.1, Primary Containment
6. Technical Specification 3.6.4.1, Secondary Containment
7. UFSAR Table 5.2-1, Primary Containment
8. EP-EAL-0501, Estimation of Radiation Monitor Readings Indicating Core Uncovery During Refuel
9. DBD P-T-02, Containment, Section 3.2.14
10. DBD P-S-20, Neutron Monitoring System

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA6**

**Initiating Condition:**

Loss of RPV inventory.

**Operating Mode Applicability:**

4, 5

**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.
1. a. Loss of RPV inventory as indicated by level < - **48 inches**.  
**OR**
  2. a. RPV water level **cannot** be monitored for **≥ 15 minutes**.  
**AND**
  - b. Loss of RPV inventory per Table C3 indications.

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"> <li>● UNPLANNED floor or equipment sump level rise*</li> <li>● UNPLANNED Torus level rise*</li> <li>● UNPLANNED vessel make up rate rise</li> <li>● Observation of leakage or inventory loss</li> </ul>
<p>*Rise in level is attributed to a loss of RPV inventory.</p>

**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 conditions that are precursors to a loss of the ability to adequately cool irradiated fuel (i.e., a precursor to a challenge to the fuel clad barrier). This condition represents a potential substantial reduction in the level of plant safety.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CA6 (cont)**

**Basis (cont):**

**EAL #1 Basis**

A lowering of water level below -48 inches indicates that operator actions have not been successful in restoring and maintaining RPV water level. The heat-up rate of the coolant will rise as the available water inventory is reduced. A continuing drop in water level will lead to core uncover.

Although related, EAL #1 is concerned with the loss of RCS inventory and not the potential concurrent effects on systems needed for decay heat removal (e.g., loss of a Residual Heat Removal suction point). A rise in RCS temperature caused by a loss of decay heat removal capability is evaluated under IC CA5.

**EAL #2 Basis**

The inability to monitor RPV water level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

The 15-minute duration for the loss of level indication was chosen because it is half of the Threshold duration specified in IC CS6

If the RPV water level continues to lower, then escalation to Site Area Emergency would be via IC CS6.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA1
2. Technical Specification 3.4.4, RCS Operational Leakage
3. UFSAR 5.2.5, Primary Containment
4. ST-O-020-560-2/3 REACTOR COOLANT LEAKAGE TEST
5. OT-101 HIGH DRYWELL PRESSURE - PROCEDURE
6. ARC 227-A4 Drywell Hi Pressure Sealed-In
7. ARC 210-A4 Drywell Hi-Lo Pressure
8. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.1 Drywell Floor Drain Sump Operation
9. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.2 Drywell Equipment Drain Sump Operation
10. T-102, Primary Containment Control

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU6****Initiating Condition:**

UNPLANNED loss of RPV inventory for 15 minutes or longer.

**Operating Mode Applicability:**

4, 5

**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.

1. UNPLANNED loss of reactor coolant results in the inability to restore and maintain RPV water level to above the **procedurally established lower limit** for **≥ 15 minutes**.

**OR**

2. a. RPV water level **cannot** be monitored

**AND**

- b. Loss of RPV inventory per Table C3 indications.

<b>Table C3 Indications of RCS Leakage</b>
<ul style="list-style-type: none"><li>● UNPLANNED floor or equipment sump level rise*</li><li>● UNPLANNED Torus level rise*</li><li>● UNPLANNED vessel make up rate rise</li><li>● Observation of leakage or inventory loss</li></ul>
*Rise in level is attributed to a loss of RPV inventory.

**RECOGNITION CATEGORY**  
**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**  
**CU6 (cont)**

**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 the inability to restore and maintain water level to a required minimum level (or the lower limit of a level band), or a loss of the ability to monitor RPV water level concurrent with indications of coolant leakage. Either of these conditions is considered to be a potential degradation of the level of safety of the plant.

The procedurally established lower limit is not an operational band established above the procedural limit to allow for operator action prior to exceeding the procedural limit, but it is the procedurally established lower limit.

Refueling evolutions that decrease RCS water inventory are carefully planned and controlled. An UNPLANNED event that results in water level decreasing below a procedurally required limit warrants the declaration of an Unusual Event due to the reduced water inventory that is available to keep the core covered.

**EAL #1 Basis**

Recognizes that the minimum required RPV water level can change several times during the course of a refueling outage as different plant configurations and system lineups are implemented. This EAL is met if the minimum level, specified for the current plant conditions, cannot be maintained for 15 minutes or longer. The minimum level is typically specified in the applicable operating procedure but may be specified in another controlling document.

The 15-minute threshold duration allows sufficient time for prompt operator actions to restore and maintain the expected water level. This criterion excludes transient conditions causing a brief lowering of water level.

**EAL #2 Basis**

Addresses a condition where all means to determine RPV water level have been lost. In this condition, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the RPV.

Continued loss of RCS inventory may result in escalation to the Alert emergency classification level via either IC CA6 or CA5.

**RECOGNITION CATEGORY  
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

**CU6 (cont)**

**Basis Reference(s):**

1. NEI 99-01, Rev. 6 CU1
2. Technical Specification 3.4.4, RCS Operational Leakage
3. UFSAR 5.2.5, Primary Containment
4. ST-O-020-560-2/3 REACTOR COOLANT LEAKAGE TEST
5. OT-101 HIGH DRYWELL PRESSURE - PROCEDURE
6. ARC 227-A4 Drywell Hi Pressure Sealed-In
7. ARC 210-A4 Drywell Hi-Lo Pressure
8. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.1 Drywell Floor Drain Sump Operation
9. DBD P-S-34 RADWASTE SYSTEM, 3.3.1.3.2 Drywell Equipment Drain Sump Operation
10. T-102, Primary Containment Control

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HG1**

**Initiating Condition:**

HOSTILE ACTION resulting in loss of physical control of the facility.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

1. A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

**AND**

2. a. **ANY** Table H1 safety function cannot be controlled or maintained.

**OR**

- b. Damage to spent fuel has occurred or is IMMINENT

<b>Table H1 – Safety Functions</b>
<ul style="list-style-type: none"> <li>• Reactivity Control (ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul>

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HG1 (cont)**

**Basis (cont):**

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.

HOSTILE FORCE: One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g., pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained.

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]*.

**Basis Reference(s):**

1. NEI 99-01, Rev. 6 HG1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HS1**

**Initiating Condition:**

HOSTILE ACTION within the PROTECTED AREA.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI): A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses the occurrence of a HOSTILE ACTION within the PROTECTED AREA. This event will require rapid response and assistance due to the possibility for damage to plant equipment.

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]*.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HS1 (cont)**

**Basis (cont):**

As time and conditions allow, these events require a heightened state of readiness by the plant staff and implementation of onsite protective measures (e.g., evacuation, dispersal or sheltering). The Site Area Emergency declaration will mobilize ORO resources and have them available to develop and implement public protective actions in the unlikely event that the attack is successful in impairing multiple safety functions.

This IC does not apply to a HOSTILE ACTION directed at an ISFSI PROTECTED AREA located outside the plant PROTECTED AREA; such an attack should be assessed using IC HA1. It also does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

Escalation of the emergency classification level would be via IC HG1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, HS1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA1**

**Initiating Condition:**

HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

1. A validated notification from NRC of an aircraft attack threat < **30 minutes** from the site.

**OR**

2. Notification by the Security Force that a HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

OWNER CONTROLLED AREA (OCA): The property associated with the station and owned by the company. Access is normally limited to persons entering for official business.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

This IC addresses the occurrence of a HOSTILE ACTION within the OWNER CONTROLLED AREA or notification of an aircraft attack threat. This event will require rapid response and assistance due to the possibility of the attack progressing to the PROTECTED AREA, or the need to prepare the plant and staff for a potential aircraft impact.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA1 (cont)**

**Basis (cont):**

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Instruction Security Program]*.

As time and conditions allow, these events require a heightened state of readiness by the plant staff and implementation of onsite protective measures (e.g., evacuation, dispersal or sheltering). The Alert declaration will also heighten the awareness of Offsite Response Organizations, allowing them to be better prepared should it be necessary to consider further actions.

This IC does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

**EAL #1 Basis**

Addresses the threat from the impact of an aircraft on the plant, and the anticipated arrival time is within 30 minutes. The intent of this EAL is to ensure that threat-related notifications are made in a timely manner so that plant personnel and OROs are in a heightened state of readiness. This EAL is met when the threat-related information has been validated in accordance with SE-23, Response to Security Threats.

**EAL #2 Basis**

Applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA. This includes any action directed against an ISFSI that is located outside the plant PROTECTED AREA.

The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may be provided by NORAD through the NRC.

In some cases, it may not be readily apparent if an aircraft impact within the OWNER CONTROLLED AREA was intentional (i.e., a HOSTILE ACTION). It is expected, although not certain, that notification by an appropriate Federal agency to the site would clarify this point. In this case, the appropriate federal agency is intended to be NORAD, FBI, FAA or NRC. The emergency declaration, including one based on other ICs/EALs, should not be unduly delayed while awaiting notification by a Federal agency.

Escalation of the emergency classification level would be via IC HS1.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA1 (cont)**

**Basis Reference(s):**

1. NEI 99-01 Rev 6, HA1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU1**

**Initiating Condition:**

Confirmed SECURITY CONDITION or threat.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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.

**OR**

2. A validated notification from the NRC providing information of an aircraft threat.

**OR**

3. Notification by the Security Force of a SECURITY CONDITION that does **not** involve a HOSTILE ACTION.

**Basis:**

**SECURITY CONDITION:** Any Security Event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A SECURITY CONDITION does not involve a HOSTILE ACTION

**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.

**HOSTILE ACTION:** An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

**HOSTAGE:** A person(s) held as leverage against the station to ensure that demands will be met by the station.

**PROJECTILE:** An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses events that pose a threat to plant personnel or SAFETY SYSTEM equipment, and thus represent a potential degradation in the level of plant safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under ICs HA1, HS1 and HG1.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU1 (cont)**

**Basis (cont):**

Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to plant personnel and OROs.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]*.

**EAL #1 Basis**

Addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with SY-AA-101-132.

**EAL #2 Basis**

Addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with SE-23, Response to Security Threats.

**EAL #3 Basis**

References Security Force because these are the individuals trained to confirm that a security event is occurring or has occurred. Training on security event confirmation and classification is controlled due to the nature of Safeguards and 10 CFR § 2.39 information.

Escalation of the emergency classification level would be via IC HA1.

**Basis Reference(s):**

1. NEI 99-01 Rev 6, HU1
2. Station Security Plan – Appendix C
3. SE-23 Response to Security Threats
4. SY-AA-101-132, Security Assessment and Response to Unusual Activities

RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY

HS2

Initiating Condition:

Inability to control a key safety function from outside the Control Room.

Operating Mode Applicability:

1, 2, 3, 4, 5, D

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.
1. A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per:
    - SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure  
**OR**
    - SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure  
**AND**
  2. Control of **ANY** Table H1 key safety function is **not** reestablished in **< 15 minutes**.

<b>Table H1 – Safety Functions</b>
<ul style="list-style-type: none"> <li>• Reactivity Control (ability to shutdown the reactor and keep it shutdown)</li> <li>• RPV Water Level (ability to cool the core)</li> <li>• RCS Heat Removal (ability to maintain a heatsink)</li> </ul>

Basis:

The time period to establish control of the plant starts when either:

- a. Control of the plant is no longer maintained in the Main Control Room  
**OR**
- b. The last Operator has left the Main Control Room.

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations, and the control of a key safety function cannot be reestablished in a timely manner. The failure to gain control of a key safety function following a transfer of plant control to alternate locations is a precursor to a challenge to one or more fission product barriers within a relatively short period of time.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HS2 (cont)**

**Basis (cont):**

The determination of whether or not “control” is established at the remote safe shutdown location(s) is based on Emergency Director judgment. The Emergency Director is expected to make a reasonable, informed judgment within 15 minutes

whether or not the operating staff has control of key safety functions from the remote safe shutdown location(s).

Escalation of the emergency classification level would be via IC FG1 or CG6.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HS6
2. SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure
3. SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA2**

**Initiating Condition:**

Control Room evacuation resulting in transfer of plant control to alternate locations.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per:

- SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure
- OR**
- SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure

**Basis:**

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations outside the Control Room. The loss of the ability to control the plant from the Control Room is considered to be a potential substantial degradation in the level of plant safety.

Following a Control Room evacuation, control of the plant will be transferred to alternate shutdown locations. The necessity to control a plant shutdown from outside the Control Room, in addition to responding to the event that required the evacuation of the Control Room, will present challenges to plant operators and other on-shift personnel. Activation of the ERO and emergency response facilities will assist in responding to these challenges.

Escalation of the emergency classification level would be via IC HS2.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HA6
2. SE-1, Plant Shutdown from the Remote Shutdown Panel – Procedure
3. SE-10, Plant Shutdown from the Alternative Shutdown Panels – Procedure

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU3**

**Initiating Condition:**

FIRE potentially degrading the level of safety of the plant.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**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.
- Escalation of the emergency classification level would be via IC CA2 or MA5

1. A FIRE in **ANY** Table H2 area is **not** extinguished in **< 15-minutes** of **ANY** of the following FIRE detection indications:

- 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

<b>Table H2 – Vital Areas</b>
<ul style="list-style-type: none"> <li>• Reactor Building (when inerted the Drywell is exempt)</li> <li>• Control Room</li> <li>• Diesel Generator Building</li> <li>• Emergency Pump Structure</li> <li>• Inner Screen Structure</li> <li>• Emergency Cooling Tower</li> <li>• Emergency Switchgear/Battery Rooms</li> <li>• Cable Spread Room</li> </ul>

**OR**

2. a. Receipt of a single fire alarm in **ANY** Table H2 area (i.e. no other indications of a FIRE).

**AND**

2. b. The existence of a FIRE is **not** verified in **< 30 minutes** of alarm receipt.

**OR**

- 3 A FIRE within the plant PROTECTED AREA or ISFSI PROTECTED AREA **not** extinguished in **< 60-minutes** of the initial report, alarm or indication.

**OR**

- 4 A FIRE within the plant PROTECTED AREA or ISFSI PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU3 (cont)**

**Basis:**

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI): A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses the magnitude and extent of FIRES that may be indicative of a potential degradation of the level of safety of the plant.

**EAL #1Basis**

The intent of the 15-minute duration is to size the FIRE and to discriminate against small FIRES that are readily extinguished (e.g., smoldering waste paper basket). In addition to alarms, other indications of a FIRE could be a drop in fire main pressure, automatic activation of a suppression system, etc.

Upon receipt, operators will take prompt actions to confirm the validity of an initial fire alarm, indication, or report. For EAL assessment purposes, the emergency declaration clock starts at the time that the initial alarm, indication, or report was received, and not the time that a subsequent verification action was performed. Similarly, the fire duration clock also starts at the time of receipt of the initial alarms, indication or report.

**EAL #2 Basis**

This EAL addresses receipt of a single fire alarm, and the existence of a FIRE is not verified (i.e., proved or disproved) within 30-minutes of the alarm. Upon receipt, operators will take prompt actions to confirm the validity of a single fire alarm. For EAL assessment purposes, the 30-minute clock starts at the time that the initial alarm was received, and not the time that a subsequent verification action was performed.

A single fire alarm, absent other indication(s) of a FIRE, may be indicative of equipment failure or a spurious activation, and not an actual FIRE. For this reason, additional time is allowed to verify the validity of the alarm. The 30-minute period is a reasonable amount of time to determine if an actual FIRE exists; however, after that time, and absent information to the contrary, it is assumed that an actual FIRE is in progress.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HU3 (cont)**

**Basis (cont):**

If an actual FIRE is verified by a report from the field, then EAL #1 is immediately applicable, and the emergency must be declared if the FIRE is not extinguished within 15-minutes of the report. If the alarm is verified to be due to an equipment failure or a spurious activation, and this verification occurs within 30-minutes of the receipt of the alarm, then this EAL is not applicable and no emergency declaration is warranted.

**EAL #3 Basis**

In addition to a FIRE addressed by EAL #1 or EAL #2, a FIRE within the plant PROTECTED AREA not extinguished within 60-minutes may also potentially degrade the level of plant safety. This basis extends to a FIRE occurring within the PROTECTED AREA of an ISFSI located outside the plant PROTECTED AREA.

**EAL #4 Basis**

If a FIRE within the plant or ISFSI PROTECTED AREA is of sufficient size to require a response by an offsite firefighting agency (e.g., a local town Fire Department), then the level of plant safety is potentially degraded. The dispatch of an offsite firefighting agency to the site requires an emergency declaration only if it is needed to actively support firefighting efforts because the fire is beyond the capability of the Fire Brigade to extinguish. Declaration is not necessary if the agency resources are placed on stand-by, or supporting post-extinguishment recovery or investigation actions.

Basis-Related Requirements from Appendix R

Appendix R to 10 CFR 50, states in part:

Criterion 3 of Appendix A to this part specifies that "Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions."

When considering the effects of fire, those systems associated with achieving and maintaining safe shutdown conditions assume major importance to safety because damage to them can lead to core damage resulting from loss of coolant through boil-off.

Because fire may affect safe shutdown systems and because the loss of function of systems used to mitigate the consequences of design basis accidents under post-fire conditions does not per se impact public safety, the need to limit fire damage to systems required to achieve and maintain safe shutdown conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design basis accidents.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HU3 (cont)**

**Basis (cont):**

In addition, Appendix R to 10 CFR 50, requires, among other considerations, the use of 1-hour fire barriers for the enclosure of cable and equipment and associated non-safety circuits of one redundant train (G.2.c). As used in EAL #2, the 30-minutes to verify a single alarm is well within this worst-case 1-hour time period.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU4
2. T-300 Bases, Fire Guides
3. ON-114, Actual Fire Reported in the Power Block, Diesel Generator Building, Emergency Pump, Inner Screen or Emergency Cooling Tower Structures

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU4**

**Initiating Condition:**

Seismic event greater than OBE levels.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

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

- Escalation of the emergency classification level would be via IC CA2 or MA5
- For emergency classification if EAL 2.b is not able to be confirmed, then the occurrence of a seismic event is confirmed in manner deemed appropriate by the Shift Manager or Emergency Director in **≤ 15 mins** of the event.

1. Seismic event **> Operating Basis Earthquake (OBE)** as indicated by the Alarm on Panel 316 A-5."OPERATING BASIS EARTHQUAKE EXCEEDED"

**OR**

2. When Seismic Monitoring Equipment is **not** available:

a. Control Room personnel feel an actual or potential seismic event.

**AND**

b. **ANY** one of the following confirmed in **≤ 15 mins** of the event:

- The earthquake resulted in Modified Mercalli Intensity (MMI) **≥ VI** and occurred **≤ 3.5 miles** of the plant.
- The earthquake was magnitude **≥ 6.0**
- The earthquake was magnitude **≥ 5.0** and occurred **≤ 125 miles** of the plant.

**Basis:**

This IC addresses a seismic event that results in accelerations at the plant site greater than those specified for an Operating Basis Earthquake (OBE)<sup>1</sup>. An earthquake greater than an OBE but less than a Safe Shutdown Earthquake (SSE)<sup>2</sup> should have no significant impact on safety-related systems, structures and components; however, some time may be required for the plant staff to ascertain the actual post-event condition of the plant (e.g., performs walk-downs and post-event inspections).

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<sup>1</sup> An OBE is vibratory ground motion for which those features of a nuclear power plant necessary for continued operation without undue risk to the health and safety of the public will remain functional.

<sup>2</sup> An SSE is vibratory ground motion for which certain (generally, safety-related) structures, systems, and components must be designed to remain functional.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU4 (cont)**

**Basis (cont):**

Given the time necessary to perform walk-downs and inspections, and fully understand any impacts, this event represents a potential degradation of the level of safety of the plant.

Event verification with external sources should not be necessary during or following an OBE. Earthquakes of this magnitude should be readily felt by on-site personnel and recognized as a seismic event (e.g., typical lateral accelerations are in excess of 0.08g). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., a call to the USGS, check internet news sources, etc.); however, the verification action must not preclude a timely emergency declaration.

EAL #2.b and the accompanying note is included to ensure that a declaration does not result from felt vibrations caused by a non-seismic source (e.g., a dropped load). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., call to USGS, check internet source, etc.) however, the verification action must not preclude a timely emergency declaration. This guidance recognizes that it may cause the site to declare an Unusual Event while another site, similarly affected but with readily available OBE indications in the Control Room, may not.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU2
2. SE-5, Earthquake – Bases
3. US NRC Reg. Guide 1.166, Pre-Earthquake Planning and Immediate Nuclear Power Plant Operator Earthquake Actions.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA5**

**Initiating Condition:**

Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.

**Operatng Mode Applicability:**

1, 2, 3, 4, 5

**Emergency Action Level (EAL):**

**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.

1. Release of a toxic, corrosive, asphyxiant or flammable gas in a Table H3 area.

<b>Table H3 Areas with Entry Related Mode Applicability</b>	
<b>Area of concern</b>	<b>Entry Related Mode Applicability</b>
<b>Reactor Building</b>	Modes 3, 4 and 5
135' all areas	
<b>Control Room</b>	Modes 1, 2, 3, 4, and 5

**AND**

2. Entry into the room or area is prohibited or impeded

**Basis:**

This IC addresses an event involving a release of a hazardous gas that precludes or impedes access to equipment necessary to maintain normal plant operation, or required for a normal plant cooldown and shutdown. This condition represents an actual or potential substantial degradation of the level of safety of the plant.

**RECOGNITION CATEGORY**  
**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**  
**HA5 (cont)**

**Basis (cont):**

Assuming all plant equipment is operating as designed, normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table H3 is a list of plant rooms or areas, in addition to the main control room, with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation, 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).

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 gaseous release preclude the ability to place shutdown cooling in service. The emergency classification is not contingent upon whether entry is actually necessary at the time of the release.

Evaluation of the IC and EAL do not require atmospheric sampling; it only requires the Emergency Director's judgment that the gas concentration in the affected room/area is sufficient to preclude or significantly impede procedurally required access. This judgment may be based on a variety of factors including an existing job hazard analysis, report of ill effects on personnel, advice from a subject matter expert or operating experience with the same or similar hazards. Access should be considered as impeded if extraordinary measures are necessary to facilitate entry of personnel into the affected room/area (e.g., requiring use of protective equipment, such as SCBAs, that is not routinely employed).

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 gaseous release). For example, the plant is in Mode 1 when the gaseous release occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.
- The gas release is a planned activity that includes compensatory measures which address the temporary inaccessibility of a room or area (e.g., fire suppression system testing).
- 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.

An asphyxiant is a gas capable of reducing the level of oxygen in the body to dangerous levels. Most commonly, asphyxiants work by merely displacing air in an enclosed

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HA5 (cont)**

**Basis (cont):**

environment. This reduces the concentration of oxygen below the normal level of around 19%, which can lead to breathing difficulties, unconsciousness or even death.

This EAL does not apply to firefighting activities that generate smoke, that automatically or manually activate a fire suppression system in an area, or to intentional inerting of containment.

The Operating Mode Applicability of this EAL has been revised from All Modes to modes 1, 2, 3 4, and 5 due to the mode applicability of the areas of concern in Table H-3. In the future should the areas of concern in Table H-3 be revised then the Operating Mode Applicability of this EAL should be reevaluated.

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

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HA5
2. T-300 Bases
3. AR 660892, Station Halon and IDLH Evaluations
4. 29CFR1910.134(b) and 29CFR1910.134(d)(2)(iii)
5. ON-114, Actual Fire Reported in the Power Block, Diesel Generator Building, Emergency Pump, Inner Screen or Emergency Cooling Tower Structures
6. SO 10.1.B-2(3), "Residual Heat Removal System Shutdown Cooling Mode Manual Start"

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU6**

**Initiating Condition:**

Hazardous Event

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

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

- EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.
- Escalation of the emergency classification level would be via IC CA2 or MA5

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.

**OR**5. Abnormal River level, as indicated by **EITHER**:

- > 112 ft. (high level)

**OR**

- < 98.5 ft. (low level)

**Basis:**

**PROTECTED AREA:** An area that normally encompasses all controlled areas within the security protected area fence.

**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  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HU6 (cont)**

**Basis (cont):**

This IC addresses hazardous events that are considered to represent a potential degradation of the level of safety of the plant.

**EAL #1 Basis**

Addresses a tornado striking (touching down) within the Protected Area.

**EAL #2 Basis**

Addresses flooding of a building room or area that results in operators isolating power to a SAFETY SYSTEM component due to water level or other wetting concerns. Classification is also required if the water level or related wetting causes an automatic isolation of a SAFETY SYSTEM component from its power source (e.g., a breaker or relay trip). To warrant classification, operability of the affected component must be required by Technical Specifications for the current operating mode.

**EAL #3 Basis**

Addresses a hazardous materials event originating at an offsite location and of sufficient magnitude to impede the movement of personnel within the PROTECTED AREA.

**EAL #4 Basis**

Addresses a hazardous event that causes an on-site impediment to vehicle movement and significant enough to prohibit the plant staff from accessing the site using personal vehicles. Examples of such an event include site flooding caused by a hurricane, heavy rains, up-river water releases, dam failure, etc., or an on-site train derailment blocking the access road.

This EAL is not intended to apply to routine impediments such as fog, snow, ice, or vehicle breakdowns or accidents, but rather to more significant conditions such as the Hurricane Andrew strike on Turkey Point in 1992, the flooding around the Cooper Station during the Midwest floods of 1993, or the flooding around Ft. Calhoun Station in 2011.

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY  
HU6 (cont)**

**Basis (cont):**

**EAL #5 Basis**

Cooling water is pumped from the normal heat sink (Conowingo Pond) via the pump structure.

High River level of greater than 112 feet: At this level open grating in the operating floor of the Circulating Water Pump Structure will allow water from the circulating water bays to rise into the structure during postulated external flooding conditions. Per the UFSAR, "The configuration of the circulating water system would likely trip at a flood elevation of about 113 feet. Therefore, a river elevation of 111 feet was chosen as the elevation at which a "flood-related shutdown is initiated." The use of a threshold of 112 feet for the Unusual Event would represent a condition prior to the postulated loss of circulating water.

Low River level of less than 98.5 feet: This is the plant low water design level and consistent with T.S. 3.7.2 (Minimum Water Level in Pump Bay). Per the UFSAR, with river level at 104 feet, when an uncontrolled release of about 350,000 cfs is passed through the Conowingo Dam and there is no in flow into pond, it will require about 1-1/2 hours to drop level to 98.5 feet.

Escalation of the emergency classification level would be based on ICs in Recognition Categories R, F, M, H or C.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU3
2. SE-4, Flood – Bases
3. DBD P-T-09, Internal Hazards
4. UFSAR Section 2.4.3.5.5, Emergency Shutdown due to High or Low Water Level in Conowingo Pond

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HG7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a GENERAL EMERGENCY.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (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 offsite for more than the immediate site area.

**Basis:**

IMMEDIATE: 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.

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a General Emergency.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HG7

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HS7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a SITE AREA EMERGENCY.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (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.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a Site Area Emergency.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HS7

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HA7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an ALERT.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (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.

**Basis:**

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an Alert.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HA7

**RECOGNITION CATEGORY  
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**HU7**

**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an UNUSUAL EVENT.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

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.

**Basis:**

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an UNUSUAL EVENT.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 HU7

**RECOGNITION CATEGORY  
ISFSI MALFUNCTIONS****E-HU1****Initiating Condition**

Damage to a loaded cask CONFINEMENT BOUNDARY.

**Operating Mode Applicability:**

1, 2, 3, 4, 5, D

**Emergency Action Level (EAL):**

Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading:

- **> 350 mr/hr gamma and 30 mr/hr neutron** on the top (protective cover)  
**OR**
- **> 250 mr/hr gamma and 60 mr/hr neutron** on the sides of the radial neutron shield  
**OR**
- **> 1100 mr/hr gamma and 250 mr/hr neutron** on the side surfaces of the cask above the radial neutron shield  
**OR**
- **> 800 mr/hr gamma and 600 mr/hr neutron** on the side surfaces of the cask below the radial neutron shield.

**.Basis:**

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

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) : A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses an event that results in damage to the CONFINEMENT BOUNDARY of a storage cask containing spent fuel. It applies to irradiated fuel that is licensed for dry storage beginning at the point that the loaded storage cask is sealed. The word cask, as used in this EAL, refers to the storage container in use at the site for dry storage of irradiated fuel. The issues of concern are the creation of a potential or actual release path to the environment, degradation of one or more fuel assemblies due to environmental factors, and configuration changes which could cause challenges in removing the cask or fuel from storage.

**RECOGNITION CATEGORY  
ISFSI MALFUNCTIONS****E-HU1 (cont)****Basis (cont):**

The existence of “damage” is determined by radiological survey. The technical specification multiple of “2 times”, which is also used in Recognition Category R IC RU1, is used here to distinguish between non-emergency and emergency conditions. The emphasis for this classification is the degradation in the level of safety of the spent fuel cask and not the magnitude of the associated dose or dose rate. It is recognized that in the case of extreme damage to a loaded cask, the fact that the “on-contact” dose rate limit is exceeded may be determined based on measurement of a dose rate at some distance from the cask.

Security-related events for ISFSIs are covered under ICs HU1 and HA1.

**Basis Reference(s):**

1. NEI 99-01, Rev 6 E-HU1
2. Certificate of Compliance No. 1027, TN-68 Technical Specifications Amendment No.1 Section 5.2.3