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10 CFR 50.90
10 CFR 50 Appendix E

May 07, 2015
MNS-15-018

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Duke Energy Carolinas, LLC (Duke Energy)
McGuire Nuclear Station Units 1 and 2
Docket Nos. 50-369, 50-370
Renewed License Nos. NPF-9 and NPF-17

Subject: License Amendment Request to Adopt Emergency Action Level Scheme Pursuant to NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors" dated November 2012

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," Section IV.B, Duke Energy is submitting a request for an amendment to the Emergency Plan for McGuire Nuclear Station, Units 1 and 2 (MNS).

The proposed amendment involves upgrading selected MNS Emergency Action Levels (EALs) based on NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," using the guidance of NRC Regulatory Issue Summary 2003-18, Supplement 2, "Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels." MNS currently uses an emergency classification scheme based on NUMARC/NESP-007 (Revision 2, January 1992), "Methodology for Development of Emergency Action Levels," (endorsed by the Nuclear Regulatory Commission in Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, August 1992). The plan, as changed, would continue to meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR 50. Pursuant to 10 CFR 50, Appendix E, Section IV.B, Duke Energy requests NRC approval of this proposed change to the MNS Emergency Plan prior to implementation.

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The enclosures to this letter provide descriptions and assessments of the proposed changes. The enclosures also provide the existing Emergency Plan pages marked up to show the proposed changes:

Enclosure 1 - Evaluation of Proposed Change
Enclosure 2 - MNS NEI 99-01, Revision 6 Emergency Action Level (EAL) Comparison Matrix
Enclosure 3 - EAL Technical Bases Document (Clean Version)
Enclosure 4 - EAL Technical Bases Document (Redline and Strikeout Version)
Enclosure 5 - MNS Radiological Effluent EAL Values
Enclosure 6 - MNS EAL Wallcharts

Duke Energy requests approval of the proposed changes by April 30, 2016, with the amendment being implemented by the end of the third quarter 2016.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated North Carolina State Officials.

Duke Energy commits to review the new classification scheme with state and local emergency management officials following NRC approval and prior to implementation of the changes.

If there are any questions related to this submittal contact George Murphy at (980) 875-5715.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 07, 2015.

Steven M Snyder for
Steven D. Capps

Enclosures:

Enclosure 1 - Evaluation of Proposed Change
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ENCLOSURE 1

EVALUATION OF PROPOSED CHANGE

SUBJECT: PROPOSED CHANGE TO MNS THE EMERGENCY PLAN

1.0 SUMMARY DESCRIPTION

2.0 DETAILED DESCRIPTION

3.0 TECHNICAL EVALUATION

4.0 REGULATORY EVALUATION

- 4.1 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA
- 4.2 NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION
- 4.3 CONCLUSIONS

5.0 ENVIRONMENTAL CONSIDERATION

6.0 REFERENCES

1.0 SUMMARY DESCRIPTION

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," Section IV.B, Duke Energy is submitting a license amendment request to change the McGuire Nuclear Station (MNS) Emergency Plan.

The proposed changes involve upgrading selected MNS Emergency Action Levels (EALs) based on NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," using the guidance of NRC Regulatory Issue Summary 2003-18, Supplement 2, "Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels." MNS currently uses an emergency classification scheme based on NUMARC/NESP-007 (Revision 2, January 1992), "Methodology for Development of Emergency Action Levels (endorsed by the Nuclear Regulatory Commission in Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, August 1992 and approved for MNS in Reference 6). The plan, as changed, would continue to meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR 50.

2.0 DETAILED DESCRIPTION

MNS currently uses an emergency classification scheme based on NUMARC/NESP-007 (Revision 2, January 1992), "Methodology for Development of Emergency Action Levels," (endorsed by the NRC in Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, August 1992). Duke Energy requests approval to change the MNS scheme basis to that described in NEI 99-01, Revision 6.

3.0 TECHNICAL EVALUATION

The Initiating Conditions (ICs) and EALs that comprise the proposed scheme are presented in Enclosure 2. This matrix provides a cross-reference between each generic IC and EAL contained in NEI 99-01, Revision 6 and the proposed MNS-specific IC and EAL. Differences and Deviations are identified in accordance with the guidance discussed in RIS 2003-18 (and Supplements). The basis for each Difference is also included. There are no Deviations from NEI 99-01, Revision 6.

The matrix follows the presentation order of NEI 99-01, Revision 6, Abnormal Rad Levels/Radiological Effluent, Cold Shutdown/Refueling System Malfunction, Events Related to Independent Spent Fuel Storage Installation (ISFSI), Fission Product Barrier Degradation, Hazards and Other Conditions Affecting Plant Safety, and System Malfunction. The Defueled Station section is not used since MNS is an operating unit.

Differences and Deviations

As discussed in Regulatory Issue Summary (RIS) 2003-18, Supplement 2 dated December 12, 2005, differences and deviations are defined as follows:

- A difference is an EAL change where the basis scheme guidance differs in wording but agrees in meaning and intent, such that classification of an event would be the same, whether using the basis scheme guidance or the site-specific proposed EAL. Examples of differences include the use of site-specific terminology or administrative re-formatting of site-specific EALs.

- A deviation is an EAL change where the basis scheme guidance differs in wording and is altered in meaning or intent, such that classification of the event could be different between the basis scheme guidance and the site-specific proposed EAL. Examples of deviations include the use of altered mode applicability, altering key words or time limits, or changing words of physical reference (protected area, safety-related equipment, etc.).

Enclosure 2 identifies each Difference between NEI 99-01 and the final products being evaluated in this LAR. These differences do not alter the meaning or intent of the ICs or EALs. There are no Deviations between NEI 99-01 and the final products being evaluated in this LAR.

Incorporation of Action Level Frequently Asked Questions (EALFAQs)

Where appropriate, information from Emergency Action Level Frequently Asked Questions (EALFAQs) has been incorporated into Enclosure 2 and Enclosure 3.

Related Documents

Enclosure 3 includes the site-specific Technical Basis Document for each recognition category for the proposed scheme. A Redline and Strikeout version of the Technical Basis Document is provided as Enclosure 4. These documents include appropriate information from the basis information contained in NEI 99-01, Revision 6. Enclosure 5 contains the supporting calculation for MNS EAL Table R-1, "Effluent Monitor Classification Thresholds." Enclosure 6 contains the revised MNS EAL Wallcharts.

Operational Modes and Applicability

Mode applicability of the proposed ICs and EALs is consistent with the NEI 99-01, Revision 6 basis scheme. The Operating Modes for MNS, as defined in the Technical Specifications, are listed below.

MODE	TITLE	REACTIVITY CONDITION (k_{eff})	% RATED THERMAL POWER	Average Reactor Coolant Temperature (°F)
1	Power Operation	$\geq$ 0.99	> 5	NA
2	Startup	$\geq$ 0.99	$\leq$ 5	NA
3	Hot Standby	< 0.99	NA	$\geq$ 350
4	Hot Shutdown	< 0.99	NA	350 > T_{avg} > 200
5	Cold Shutdown	< 0.99	NA	$\leq$ 200
6	Refueling	NA	NA	NA

In addition to these operating modes, NEI 99-01, Revision 6 defines the "Defueled" mode, as "All reactor fuel removed from Reactor Vessel (full core off load during refueling or extended outage)." MNS procedures recognize this condition as "No Mode".

State / Local Government Review of Proposed Changes

Duke Energy interacts periodicaly with the North Carolina and local emergency management agencies. The State and local emergency management officials are advised of any EAL changes actually implemented. In the case of this EAL scheme revision, Duke Energy has committed to provide a review of the new classification scheme to State and local emergency management officials following NRC approval and prior to implementation.

Implementation Description

Duke Energy plans to implement the proposed emergency classification scheme in the third quarter of 2016[1]. When implemented, the changes to the EALs presented in Enclosure 3 will become effective. The Emergency Action Level Technical Basis Documents (Enclosure 3) will be revised and maintained as a training and background reference resource. Any changes to the approved ICs and EALs will be made in accordance with 10 CFR 50.54(q).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.47(b)(4) states, "A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures."

10 CFR 50 Appendix E, Section IV. Content of Emergency Plans, Item B, Assessment Actions states:

1. "The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety. The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring. By June 20, 2012, for nuclear power reactor licensees, these action levels must include hostile action that may adversely affect the nuclear power plant. The initial emergency action levels shall be discussed and agreed on by the applicant or licensee and state and local governmental authorities, and approved by the NRC. Thereafter, emergency action levels shall be reviewed with the State and local governmental authorities on an annual basis."

2. "A licensee desiring to change its entire emergency action level scheme shall submit an application for an amendment to its license and receive NRC approval before implementing the change. Licensees shall follow the change process in 10 CFR 50.54(q) for all other emergency action level changes."

[1] This plan is contingent on several factors including the anticipated time required for NRC review and approval and the MNS Unit 1 Refueling Outage to be conducted in Spring of 2016.

Regulatory Guide 1.101, Emergency Planning and Preparedness for Nuclear Power Reactors, Revision 4, Section C. Regulatory Position states, "The guidance in NUMARC/NESP-007 (Revision 2, January 1992), "Methodology for Development of Emergency Action Levels," is acceptable to the NRC staff as an alternative method to that described in Appendix 1 to NUREG-0654/FEMA-REP-1 for developing EALs required in Section IV.B of Appendix E to 10 CFR Part 50 and 10 CFR 50.47(b)(4). In addition, the guidance contained in NEI 99-01 (Revision 4, January 2003), "Methodology for Development of Emergency Action Levels," is acceptable to the NRC staff as an alternative method to that described in Appendix 1 to NUREG-0654/FEMA-REP-1 and NUMARC/NESP-007 for developing EALs required in Section IV of Appendix E to 10 CFR Part 50 and 10 CFR 50.47(b)(4)."

This plan is contingent on several factors including the anticipated time required for NRC review and approval and the MNS Unit 1 Refueling Outage to be conducted in Spring of 2016.

4.2 Significant Hazards Consideration

Duke Energy has evaluated whether or not a significant hazards consideration (SHC) is warranted with the proposed changes by addressing the three criterion set forth in 10 CFR 50.92(c) as discussed below.

Criterion 1:
Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

These changes affect the MNS Emergency Plan and do not alter any of the requirements of the Operating License or the Technical Specifications. The proposed changes do not modify any plant equipment and do not impact any failure modes that could lead to an accident. Additionally, the proposed changes do not impact the consequence of any analyzed accident since the changes do not affect any equipment related to accident mitigation. Based on this discussion, the proposed amendment does not increase the probability or consequences of an accident previously evaluated.

Criterion 2:
Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

These changes affect the MNS Emergency Plan and do not alter any of the requirements of the Operating License or the Technical Specifications. They do not modify any plant equipment and there is no impact on the capability of the existing equipment to perform its intended functions. No system setpoints are being modified, and no changes are being made to the method in which plant operations are conducted. No new failure modes are

introduced by the proposed changes. The proposed amendment does not introduce accident initiator or malfunctions that would cause a new or different kind of accident. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3:
Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

These changes affect the MNS Emergency Plan and do not alter any of the requirements of the Operating License or the Technical Specifications. The proposed changes do not affect any of the assumptions used in the accident analysis, nor do they affect any operability requirements for equipment important to plant safety. Therefore, the proposed changes will not result in a significant reduction in the margin of safety as defined in the bases for technical specifications covered in this license amendment request.

4.3 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

Duke Energy has determined that the proposed amendment would not change requirements with respect to use of a facility component located within the restricted area, as defined by 10 CFR 20, nor would it change inspection or surveillance requirements. Duke Energy has evaluated the proposed change and has determined that the change does not involve:

I. A Significant Hazards Consideration,
II. A significant change in the types or significant increase in the amounts of any effluent that may be released off site, or
III. A significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10)(ii). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. NUMARC/NESP-007, Revision 2, "Methodology for Development of Emergency Action Levels", dated January 1992 (ADAMS Accession No.ML041120174)

2. NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors", dated November 2012, (ADAMS Accession No. ML12326A805)

3. NRC Regulatory Issue Summary 2003-18, Supplement 2, "Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels", dated December 12, 2005 (ADAMS Accession No. ML051450482)

4. Regulatory Guide 1.101, Revision 3, "Emergency Planning and Preparedness for Nuclear Power Reactors" dated August 1992 (ADAMS Accession No. ML003740302)

5. Letter from Frank Rinaldi (USNRC) to H. B. Barron (Duke Energy) dated January 28, 1998, "Emergency Action Level Changes - McGuire Nuclear Station Units 1 and 2 (TAC Nos. M94491 and M94492)"

ENCLOSURE 2

MNS NEI 99-01, REVISION 6 EAL COMPARISON MATRIX

McGuire Nuclear Station
NEI 99-01 Revision 6
EAL Comparison Matrix

Revision 0 [5/6/15]

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Introduction

This document provides a line-by-line comparison of the Initiating Conditions (ICs), Mode Applicability and Emergency Action Levels (EALs) in NEI 99-01 Rev. 6 Final, Development of Emergency Action Levels for Non-Passive Reactors, ADAMS Accession Number ML12326A805, and the McGuire Nuclear Station (MNS) ICs, Mode Applicability and EALs. This document provides a means of assessing MNS differences and deviations from the NRC endorsed guidance given in NEI 99-01. Discussion of MNS EAL bases and lists of source document references are given in the EAL Technical Bases Document. It is, therefore, advisable to reference the EAL Technical Bases Document for background information while using this document. **MNS has taken no deviations from the generic guidance.**

Comparison Matrix Format

The ICs and EALs discussed in this document are grouped according to NEI 99-01 Recognition Categories. Within each Recognition Category, the ICs and EALs are listed in tabular format according to the order in which they are given in NEI 99-01. Generally, each row of the comparison matrix provides the following information:

- NEI EAL/IC identifier
- NEI EAL/IC wording
- MNS EAL/IC identifier
- MNS EAL/IC wording
- Description of any differences or deviations

EAL Wording

In Section 4.1, NEI recommends the following: "The guidance in NEI 99-01 is not intended to be applied to plants "as-is"; however, developers should attempt to keep their site-specific schemes as close to the generic guidance as possible. The goal is to meet the intent of the generic Initiating Conditions (ICs) and Emergency Action Levels (EALs) within the context of site-specific characteristics – locale, plant design, operating features, terminology, etc. Meeting this goal will result in a shorter and less cumbersome NRC review and approval process, closer alignment with the schemes of other nuclear power plant sites and better positioning to adopt future industry-wide scheme enhancements"

EAL Emphasis Techniques

Due to the width of the table columns and table formatting constraints in this document, line breaks and indentation may differ slightly from the appearance of comparable wording in the source documents. NEI 99-01 is the source document for the NEI EALs; the MNS EAL Technical Bases Document for the MNS EALs.

The print and paragraph formatting conventions summarized below guide presentation of the MNS EALs in accordance with the EAL writing criteria. Space restrictions in the EAL table of this document sometimes override this criteria in cases when following the criteria would introduce undesirable complications in the EAL layout.

- Upper case-bold print is used for the logic terms **AND**, **OR** and **EITHER**.
- Bold font is used for certain logic terms, negative terms (**not**, **cannot**, etc.), **any**, **all**.
- Upper case print is reserved for defined terms, acronyms, system abbreviations, logic terms (and, or, etc. when not used as a conjunction), annunciator window engravings.
- Three or more items in a list are normally introduced with "**Any** of the following..." or "**All** of the following..." Items of the list begin with bullets when a priority or sequence is not inferred.
- The use of **AND/OR** logic within the same EAL has been avoided when possible. When such logic cannot be avoided, indentation and separation of subordinate contingent phrases is employed.

Global Differences

The differences listed below generally apply throughout the set of EALs and are not repeated in the Justification sections of this document. The global differences do not decrease the effectiveness of the intent of NEI 99-01.

1. The NEI phrase "Notification of Unusual Event" has been changed to "Unusual Event" or abbreviated "UE" to reduce EAL-user reading burden.
2. NEI 99-01 IC Example EALs are implemented in separate plant EALs to improve clarity and readability. For example, NEI lists all IC HU3 Example EALs under one IC. The corresponding MNS EALs appear as unique EALs (e.g., HU3.1 through HU3.4).
3. Mode applicability identifiers (numbers/letter) modify the NEI 99-01 mode applicability names as follows: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown, 5 - Cold Shutdown, 6 - Refueling, NM – No Mode. MNS defines NM the same as NEI 99-01defines Defueled as follows: "Reactor Vessel contains no irradiated fuel"
4. NEI 99-01 uses the terms greater than, less than, greater than or equal to, etc. in the wording of some example EALs. For consistency and reduce EAL-user reading burden, MNS has adopted use of boolean symbols in place of the NEI 99-01 text modifiers within the EAL wording.
5. "min." is the standard abbreviation for "minutes" and is used to reduce EAL user reading burden.
6. The term "Emergency Director" has been replaced by "Emergency Coordinator/EOF Director" consistent with site-specific nomenclature.
7. Wherever the generic bracketed PWR term "reactor vessel/RCS" is provided, MNS uses the term "NCS" as the site-specific nomenclature.
8. IC/EAL identification:

   - NEI Recognition Category A "Abnormal Radiation Levels/ Radiological Effluents" has been changed to Category R "Abnormal Rad Levels / Rad Effluents." The designator "R" is more intuitively associated with radiation (rad) or radiological events. NEI IC designators beginning with "A" have likewise been changed to "R."

   - NEI 99-01 defines the thresholds requiring emergency classification (example EALs) and assigns them to ICs which, in turn, are grouped in "Recognition Categories." The MNS IC/EAL scheme includes the following features:

     a. Division of the NEI EAL set into three groups:

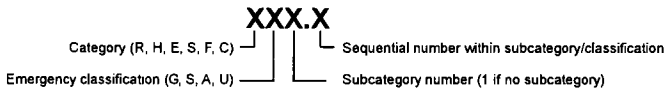
        - EALs applicable under <u>all</u> plant operating modes – This group would be reviewed by the EAL-user any time emergency classification is considered.
        - EALs applicable only under <u>hot</u> operating modes – This group would only be reviewed by the EAL-user when the plant is in Hot Shutdown, Hot Standby, Startup or Power Operation mode.
        - EALs applicable only under <u>cold</u> operating modes – This group would only be reviewed by the EAL-user when the plant is in Cold Shutdown, Refueling or No Mode.

        The purpose of the groups is to avoid review of hot condition EALs when the plant is in a cold condition and avoid review of cold condition EALs when the plant is in a hot condition. This approach significantly minimizes the total number of EALs that must be reviewed by the EAL-user for a given plant condition, reduces EAL-user reading burden and, thereby, speeds identification of the EAL that applies to the emergency.

     b. Within each of the above three groups, assignment of EALs to categories/subcategories – Category and subcategory titles are selected to represent conditions that are operationally significant to the EAL-user. Subcategories are used as necessary to further divide the EALs of a category into logical sets of possible emergency classification thresholds. The MNS EAL categories/subcategories and their relationship to NEI Recognition Categories are listed in Table 1.

c. Unique identification of each EAL – Four characters comprise the EAL identifier as illustrated in Figure 1.

Figure 1 – EAL Identifier



The first character is a letter associated with the category in which the EAL is located. The second character is a letter associated with the emergency classification level (G for General Emergency, S for Site Area Emergency, A for Alert, and U for Notification of Unusual Event). The third character is a number associated with one or more subcategories within a given category. Subcategories are sequentially numbered beginning with the number "1". If a category does not have a subcategory, this character is assigned the number "1". The fourth character is a number preceded by a period for each EAL within a subcategory. EALs are sequentially numbered within the emergency classification level of a subcategory beginning with the number "1".

The EAL identifier is designed to fulfill the following objectives:

- Uniqueness – The EAL identifier ensures that there can be no confusion over which EAL is driving the need for emergency classification.
- Speed in locating the EAL of concern – When the EALs are displayed in a matrix format, knowledge of the EAL identifier alone can lead the EAL-user to the location of the EAL within the classification matrix. The identifier conveys the category, subcategory and classification level. This assists ERO responders (who may not be in the same facility as the EC) to find the EAL of concern in a timely manner without the need for a word description of the classification threshold.
- Possible classification upgrade – The category/subcategory/identifier scheme helps the EAL-user find higher emergency classification EALs that may become active if plant conditions worsen.

Table 2 lists the MNS ICs and EALs that correspond to the NEI ICs/Example EALs when the above EAL/IC organization and identification scheme is implemented.

Differences and Deviations

In accordance NRC Regulatory Issue Summary (RIS) 2003-18 "Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels" Supplements 1 and 2, a difference is an EAL change in which the basis scheme guidance differs in wording but agrees in meaning and intent, such that classification of an event would be the same, whether using the basis scheme guidance or the MNS EAL. A deviation is an EAL change in which the basis scheme guidance differs in wording and is altered in meaning or intent, such that classification of the event could be different between the basis scheme guidance and the MNS proposed EAL.

Administrative changes that do not actually change the textual content are neither differences nor deviations. Likewise, any format change that does not alter the wording of the IC or EAL is considered neither a difference nor a deviation.

The following are examples of differences:

- Choosing the applicable EAL based upon plant type (i.e., BWR vs. PWR).
- Using a numbering scheme other than that provided in NEI 99-01 that does not change the intent of the overall scheme.
- Where the NEI 99-01 guidance specifically provides an option to not include an EAL if equipment for the EAL does not exist at MNS (e.g., automatic real-time dose assessment capability).
- Pulling information from the bases section up to the actual EAL that does not change the intent of the EAL.

- Choosing to state ALL Operating Modes are applicable instead of stating N/A, or listing each mode individually under the Abnormal Rad Level/Radiological Effluent and Hazard and Other Conditions Affecting Plant Safety sections.
- Using synonymous wording (e.g., greater than or equal to vs. at or above, less than or equal vs. at or below, greater than or less than vs. above or below, etc.)
- Adding MNS equipment/instrument identification and/or noun names to EALs.
- Combining like ICs that are exactly the same but have different operating modes as long as the intent of each IC is maintained and the overall progression of the EAL scheme is not affected.
- Any change to the IC and/or EAL, and/or basis wording, as stated in NEI 99-01, that does not alter the intent of the IC and/or EAL, i.e., the IC and/or EAL continues to:
    - Classify at the correct classification level.
    - Logically integrate with other EALs in the EAL scheme.
    - Ensure that the resulting EAL scheme is complete (i.e., classifies all potential emergency conditions).

The following are examples of deviations:

- Use of altered mode applicability.
- Altering key words or time limits.
- Changing words of physical reference (protected area, safety-related equipment, etc.).
- Eliminating an IC. This includes the removal of an IC from the Fission Product Barrier Degradation category as this impacts the logic of Fission Product Barrier ICs.
- Changing a Fission Product Barrier from a Loss to a Potential Loss or vice-versa.
- Not using NEI 99-01definitions as the intent is for all NEI 99-01 users to have a standard set of defined terms as defined in NEI 99-01. Differences due to plant types are permissible (BWR or PWR). Verbatim compliance to the wording in NEI 99-01 is not necessary as long as the intent of the defined word is maintained. Use of the wording provided in NEI 99-01 is encouraged since the intent is for all users to have a standard set of defined terms as defined in NEI 99-01.
- Any change to the IC and/or EAL, and/or basis wording as stated in NEI 99-01 that does alter the intent of the IC and/or EAL, i.e., the IC and/or EAL:
    - Does not classify at the classification level consistent with NEI 99-01.
    - Is not logically integrated with other EALs in the EAL scheme.
    - Results in an incomplete EAL scheme (i.e., does not classify all potential emergency conditions).

The "Difference Justification" columns in the remaining sections of this document identify each difference between the NEI 99-01 IC/EAL wording and the MNS IC/EAL wording. An explanation that justifies the reason for each difference is then provided. If the difference is determined to be a deviation, a statement is made to that affect and explanation is given that states why classification may be different from the NEI 99-01 IC/EAL and the reason for its acceptability. In all cases, however, the differences and deviations do not decrease the effectiveness of the intent of NEI 99-01. MNS has identified no deviations from the NEI 99-01 guidance as represented in Table 3.

Table 1 – MNS EAL Categories/Subcategories

MNS EALs		NEI Recognition Category
Category	**Subcategory**	
Group: Any Operating Mode:		
R – Abnormal Rad Levels/Rad Effluent	1 – Radiological Effluent 2 – Irradiated Fuel Event 3 – Area Radiation Levels	Abnormal **R**ad Levels/Radiological Effluent ICs/EALs
H – Hazards and Other Conditions Affecting Plant Safety	1 – Security 2 – Seismic Event 3 – Natural or Technological Hazard 4 – Fire 5 – Hazardous Gas 6 – Control Room Evacuation 7 – Emergency Coordinator Judgment	**H**azards and Other Conditions Affecting Plant Safety ICs/EALs
E - ISFSI	1 – Confinement Boundary	ISFSI ICs/EALs
Group: Hot Conditions:		
S – System Malfunction	1 – Loss of Essential AC Power 2 – Loss of Vital DC Power 3 – Loss of Control Room Indications 4 – NCS Activity 5 – NCS Leakage 6 – RPS Failure 7 – Loss of Communications 8 – Containment Failure 9 – Hazardous Event Affecting Safety Systems	**S**ystem Malfunction ICs/EALs
F – Fission Product Barrier	None	**F**ission Product Barrier ICs/EALs
Group: Cold Conditions:		
C – Cold Shutdown/Refueling System Malfunction	1 – NCS Level 2 – Loss of Essential AC Power 3 – NCS Temperature 4 – Loss of Vital DC Power 5 – Loss of Communications 6 - Hazardous Event Affecting Safety Systems	**C**old Shutdown./ Refueling System Malfunction ICs/EALs

Table 2 – NEI / MNS EAL Identification Cross-Reference

NEI		MNS	
IC	**Example EAL**	**Category and Subcategory**	**EAL**
AU1	1	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RU1.1
AU1	2	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RU1.1
AU1	3	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RU1.2
AU2	1	R – Abnormal Rad Levels / Rad Effluent, 2 – Irradiated Fuel Event	RU2.1
AA1	1	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RA1.1
AA1	2	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RA1.2
AA1	3	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RA1.3
AA1	4	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RA1.4
AA2	1	R – Abnormal Rad Levels / Rad Effluent, 2 – Irradiated Fuel Event	RA2.1
AA2	2	R – Abnormal Rad Levels / Rad Effluent, 2 – Irradiated Fuel Event	RA2.2
AA2	3	R – Abnormal Rad Levels / Rad Effluent, 2 – Irradiated Fuel Event	RA2.3
AA3	1	R – Abnormal Rad Levels / Rad Effluent, 3 – Area Radiation Levels	RA3.1
AA3	2	R – Abnormal Rad Levels / Rad Effluent, 3 – Area Radiation Levels	RA3.2
AS1	1	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RS1.1
AS1	2	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RS1.2
AS1	3	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RS1.3

NEI		MNS	
IC	**Example EAL**	**Category and Subcategory**	**EAL**
AS2	1	R – Abnormal Rad Levels / Rad Effluent, 2 – Irradiated Fuel Event	RS2.1
AG1	1	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RG1.1
AG1	2	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RG1.2
AG1	3	R – Abnormal Rad Levels / Rad Effluent, 1 – Radiological Effluent	RG1.3
AG2	1	R – Abnormal Rad Levels / Rad Effluent, 2 – Irradiated Fuel Event	RG2.1
CU1	1	C – Cold SD/ Refueling System Malfunction, 1 – NCS Level	CU1.1
CU1	2	C – Cold SD/ Refueling System Malfunction, 1 – NCS Level	CU1.2
CU2	1	C – Cold SD/ Refueling System Malfunction, 2 – Loss of ESF AC Power	CU2.1
CU3	1	C – Cold SD/ Refueling System Malfunction, 3 – NCS Temperature	CU3.1
CU3	2	C – Cold SD/ Refueling System Malfunction, 3 – NCS Temperature	CU3.2
CU4	1	C – Cold SD/ Refueling System Malfunction, 4 – Loss of Vital DC Power	CU4.1
CU5	1, 2, 3	C – Cold SD/ Refueling System Malfunction, 5 – Loss of Communications	CU5.1
CA1	1	C – Cold SD/ Refueling System Malfunction, 1 – NCS Level	CA1.1
CA1	2	C – Cold SD/ Refueling System Malfunction, 1 – NCS Level	CA1.2
CA2	1	C – Cold SD/ Refueling System Malfunction, 1 – Loss of ESF AC Power	CA2.1
CA3	1, 2	C – Cold SD/ Refueling System Malfunction, 3 – NCS Temperature	CA3.1
CA6	1	C – Cold SD/ Refueling System Malfunction, 6 – Hazardous Event Affecting Safety Systems	CA6.1
CS1	1	N/A	N/A

NEI		MNS	
IC	**Example EAL**	**Category and Subcategory**	**EAL**
CS1	2	N/A	N/A
CS1	3	C – Cold SD/ Refueling System Malfunction, 1 – NCS Level	CS1.1
CG1	1	N/A	N/A
CG1	2	C – Cold SD/ Refueling System Malfunction, 1 – NCS Level	CG1.1
E-HU1	1	E - ISFSI	EU1.1
FA1	1	F – Fission Product Barrier Degradation	FA1.1
FS1	1	F – Fission Product Barrier Degradation	FS1.1
FG1	1	F – Fission Product Barrier Degradation	FG1.1
HU1	1, 2, 3	H – Hazards and Other Conditions Affecting Plant Safety, 1 – Security	HU1.1
HU2	1	H – Hazards and Other Conditions Affecting Plant Safety, 2 – Seismic Event	HU2.1
HU3	1	H – Hazards and Other Conditions Affecting Plant Safety, 3 – Natural or Technological Hazard	HU3.1
HU3	2	H – Hazards and Other Conditions Affecting Plant Safety, 3 – Natural or Technological Hazard	HU3.2
HU3	3	H – Hazards and Other Conditions Affecting Plant Safety, 3 – Natural or Technological Hazard	HU3.3
HU3	4	H – Hazards and Other Conditions Affecting Plant Safety, 3 – Natural or Technological Hazard	HU3.4
HU3	5	N/A	N/A
HU4	1	H – Hazards and Other Conditions Affecting Plant Safety, 4 – Fire or Explosion	HU4.1
HU4	2	H – Hazards and Other Conditions Affecting Plant Safety, 4 – Fire or Explosion	HU4.2
HU4	3	H – Hazards and Other Conditions Affecting Plant Safety, 4 – Fire or Explosion	HU4.3

NEI		MNS	
IC	**Example EAL**	**Category and Subcategory**	**EAL**
HU4	4	H – Hazards and Other Conditions Affecting Plant Safety, 4 – Fire or Explosion	HU4.4
HU7	1	H – Hazards and Other Conditions Affecting Plant Safety, 7 – Judgment	HU7.1
HA1	1, 2	H – Hazards and Other Conditions Affecting Plant Safety, 1 – Security	HA1.1
HA5	1	H – Hazards and Other Conditions Affecting Plant Safety, 5 – Hazardous Gases	HA5.1
HA6	1	H – Hazards and Other Conditions Affecting Plant Safety, 6 – Control Room Evacuation	HA6.1
HA7	1	H – Hazards and Other Conditions Affecting Plant Safety, 7 – Judgment	HA7.1
HS1	1	H – Hazards and Other Conditions Affecting Plant Safety, 1 – Security	HS1.1
HS6	1	H – Hazards and Other Conditions Affecting Plant Safety, 6 – Control Room Evacuation	HS6.1
HS7	1	H – Hazards and Other Conditions Affecting Plant Safety, 7 – Judgment	HS7.1
HG1	1	H – Hazards and Other Conditions Affecting Plant Safety, 1 – Security	HG1.1
HG7	1	H – Hazards and Other Conditions Affecting Plant Safety, 7 – Judgment	HG7.1
SU1	1	S – System Malfunction, 1 – Loss of Emergency AC Power	SU1.1
SU2	1	S – System Malfunction, 3 – Loss of Control Room Indications	SU3.1
SU3	1	S – System Malfunction, 4 – NCS Activity	SU4.1
SU3	2	S – System Malfunction, 4 – NCS Activity	SU4.2
SU4	1, 2, 3	S – System Malfunction, 5 – NCS Leakage	SU5.1
SU5	1	S – System Malfunction, 6 – RPS Failure	SU6.1
SU5	2	S – System Malfunction, 6 – RPS Failure	SU6.2

NEI		MNS	
IC	**Example EAL**	**Category and Subcategory**	**EAL**
SU6	1, 2, 3	S – System Malfunction, 7 –Loss of Communications	SU7.1
SU7	1, 2	S – System Malfunction, 8 –Containment Failure	SU8.1
SA1	1	S – System Malfunction, 1 – Loss of Emergency AC Power	SA1.1
SA2	1	S – System Malfunction, 3 – Loss of Control Room Indications	SA3.1
SA5	1	S – System Malfunction, 6 – RPS Failure	SA6.1
SA9	1	S – Hazardous Event Affecting Safety Systems	SA9.1
SS1	1	S – System Malfunction, 1 – Loss of Emergency AC Power	SS1.1
SS5	1	S – System Malfunction, 6 – RPS Failure	SS6.1
SS8	1	S – System Malfunction, 2 – Loss of Vital DC Power	SS2.1
SG1	1	S – System Malfunction, 1 – Loss of Emergency AC Power	SG1.1
SG8	1	S – System Malfunction, 1 – Loss of Emergency AC Power	SG1.2

Table 3 – Summary of Deviations

NEI		MNS EAL	Description
IC	Example EAL		
N/A	N/A	N/A	N/A

Category A

Abnormal Rad Levels / Radiological Effluent

NEI IC#	NEI IC Wording and Mode Applicability	MNS IC#(s)	MNS IC Wording and Mode Applicability	Difference Justification
AU1	Release of gaseous or liquid radioactivity greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer. MODE: All	RU1	Release of gaseous or liquid radioactivity greater than 2 times the SLC limits for 60 minutes or longer MODE: All	The MNS SLC is the site-specific effluent release controlling document.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Reading on **ANY** effluent radiation monitor greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer: (site-specific monitor list and threshold values corresponding to 2 times the controlling document limits)	RU1.1	Reading on **any** Table R-1 effluent radiation monitor > column "UE" for ≥ 60 min. (Notes 1, 2, 3)	Example EALs #1 and #2 have been combined into a single EAL. Example EAL #2 addresses batch releases through the Liquid Waste Effluent Line. The alarm setpoint for this release path is not set as a function of SLC release rate limits but is based on expected maximum release rates for the specific release. This setpoint is generally a very small fraction of the SLC/TS release rate limits. This release path threshold is instead based on the calculated Table R-1 value which is a function of 2 times the SLC release limit consistent with the intent of the IC. The NEI phrase "...effluent radiation monitor greater than 2 times the (site-specific effluent release controlling document)" and "effluent radiation monitor greater than 2 times the alarm setpoint established by a current radioactivity discharge permit " have been replaced with "...**any** Table R-1 effluent radiation monitor > column "UE". UE thresholds for all MNS continuously monitored gaseous release pathways are listed in Table R-1 to consolidate the information in a single location and, thereby, simplify identification of the thresholds by the EAL user. The values shown in Table R-1 column "UE", consistent with the NEI bases, represent two times the ODCM release limits for both liquid and gaseous release.
2	Reading on **ANY** effluent radiation monitor greater than 2 times the alarm setpoint established by a current radioactivity discharge permit for 60 minutes or longer.			

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
3	Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer.	RU1.2	Sample analysis for a gaseous or liquid release indicates a concentration or release rate > 2 x SLC limits for ≥ 60 min. (Notes 1, 2)	The MNS SLC is the site-specific effluent release controlling document.
Notes	• The Emergency Director should declare the Unusual Event promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes. • 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.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded. Note 2: If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded the specified time limit. Note 3: 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.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. None

Table R-1 Effluent Monitor Classification Thresholds						
Release Point		Monitor	GE	SAE	Alert	UE
Gaseous	Unit Vent Noble Gas Low	1(2)EMF36L	----	----	4.85E+6 cpm	3.10E+3 cpm
	Unit Vent Noble Gas High	1(2)EMF36H	2.61E+4 cpm	2.61E+3 cpm	2.70E+2 cpm	----
Liquid	Liquid Waste Effluent Line High	EMF49H	----	----	----	2.15E+2 cpm
	CVUCDT High	1(2)EMF44H	----	----	----	4.29E+2 cpm

NEI IC#	NEI IC Wording and Mode Applicability	MNS IC#(s)	MNS IC Wording and Mode Applicability	Difference Justification
AU2	UNPLANNED loss of water level above irradiated fuel. MODE: All	RU2	Unplanned loss of water level above irradiated fuel MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by **ANY** of the following: (site-specific level indications). **AND** b. UNPLANNED rise in area radiation levels as indicated by **ANY** of the following radiation monitors. (site-specific list of area radiation monitors)	RU2.1	UNPLANNED water level drop in the REFUELING PATHWAY as indicated by low water level alarm or indication **AND** UNPLANNED rise in corresponding area radiation levels as indicated by **EITHER** of the following radiation monitors: • 1EMF17 (2EMF4) Spent Fuel Building Refueling Bridge • 1EMF16 (2EMF3) Containment Building Refueling Bridge (Mode 6)	The site-specific list of radiation monitors are listed in bullet format for ease of reading. 1EMF16 (2EMF3) Containment Building Refueling Bridge monitors are only operable when in Mode 6 (Refueling).

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
AA1	Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE. MODE: All	RA1	Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer: (site-specific monitor list and threshold values)	RA1.1	Reading on **any** Table R-1 effluent radiation monitor > column "ALERT" for ≥ 15 min. (Notes 1, 2, 3, 4)	The MNS radiation monitors that detect radioactivity effluent release to the environment are listed in Table R-1. UE, Alert, SAE and GE thresholds for all MNS continuously monitored gaseous and liquid release pathways are listed in Table R-1 to consolidate the information in a single location and, thereby, simplify identification of the thresholds by the EAL-user.
2	Dose assessment using actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point).	RA1.2	Dose assessment using actual meteorology indicates doses > 10 mrem TEDE or 50 mrem thyroid CDE at or beyond the SITE BOUNDARY (Notes 3, 4)	The site boundary is the site-specific receptor point.
3	Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point) for one hour of exposure.	RA1.3	Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses > 10 mrem TEDE or 50 mrem thyroid CDE at or beyond the SITE BOUNDARY for 60 min. of exposure (Notes 1, 2)	The site boundary is the site-specific receptor point.

4	Field survey results indicate **EITHER** of the following at or beyond (site-specific dose receptor point): • Closed window dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer. • Analyses of field survey samples indicate thyroid CDE greater than 50 mrem for one hour of inhalation.	RA1.4	Field survey results indicate **EITHER** of the following at or beyond the SITE BOUNDARY: • Closed window dose rates > 10 mR/hr expected to continue for ≥ 60 min. • Analyses of field survey samples indicate thyroid CDE > 50 mrem for 60 min. of inhalation. (Notes 1, 2)	The site boundary is the site-specific receptor point.
Notes	• The Emergency Director should declare the Alert promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. • If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. • The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded. Note 2: If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded the specified time limit. Note 3: 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. Note 4 The pre-calculated effluent monitor values presented in EALs RA1.1, RS1.1 and RG1.1 should be used for	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. None Incorporated site-specific EAL numbers associated with generic EAL#1.

	assessments until the results from a dose assessment using actual meteorology are available.		emergency classification assessments until the results from a dose assessment using actual meteorology are available.	

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
AA2	Significant lowering of water level above, or damage to, irradiated fuel. MODE: All	RA2	Significant lowering of water level above, or damage to, irradiated fuel MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Uncovery of irradiated fuel in the REFUELING PATHWAY.	RA2.1	Uncovery of irradiated fuel in the REFUELING PATHWAY	None
2	Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by **ANY** of the following radiation monitors: (site-specific listing of radiation monitors, and the associated readings, setpoints and/or alarms)	RA2.2	Damage to irradiated fuel resulting in a release of radioactivity **AND** A Trip 2 radiation alarm on any of the following radiation monitor indications: • 1EMF17 (2EMF4) Spent Fuel Building Refueling Bridge • 1EMF16 (2EMF3) Containment Building Refueling Bridge (Mode 6) • 1EMF42 (2EMF42) Fuel Building Ventilation • 1EMF39 (2EMF39) Containment Gas	The NEI phrase "...from the fuel as indicated by ANY of the following radiation monitors" has been replaced with "...AND A high radiation alarm on any of the following radiation monitor indications" for clarification that the classification requires two conditions: damage to fuel and a resultant high radiation alarm. The site-specific list of radiation monitors are listed in bullet format for ease of reading. The Trip 2 setpoints for the radiation monitors are indicative of significant increases in area and/or airborne radiation. 1EMF16 (2EMF3) Containment Building Refueling Bridge monitors are only operable in Mode 6.
3	Lowering of spent fuel pool level to (site-specific Level 2 value). [*See Developer Notes*]	RA2.3	Spent fuel pool level ≤ -15 ft. (756 ft. ele.) (KFP5350 or NVPG6530)	Post-Fukushima order EA-12-051 required the installation of reliable SFP level indication capable of identifying normal level (Level 1), SFP level 10 ft. above the top of the fuel racks (Level 2) and SFP level at the top of the fuel racks (Level 3). For MNS SFP Level 2 is -15 ft. (756 ft. ele.) as indicated on

				KFP5350 or NVPG6530 Deleted "Lowering of..." as level at or below Level 2 can only be attained by lowering water level.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
AA3	Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown MODE: All	RA3	Radiation levels that IMPEDE access to equipment necessary for normal plant operations, cooldown or shutdown MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Dose rate greater than 15 mR/hr in **ANY** of the following areas: • Control Room • Central Alarm Station • (other site-specific areas/rooms)	RA3.1	Dose rate > 15 mR/hr in **EITHER** of the following areas: Control Room (1EMF 12) **OR** Central Alarm Station (by survey)	No other site-specific areas requiring continuous occupancy exist at MNS. 1EMF Channel 12 monitors the Control room for area radiation. The CAS does not have installed area radiation monitoring and thus must be determined by survey.
2	An UNPLANNED event results in radiation levels that prohibit or impede access to any of the following plant rooms or areas: (site-specific list of plant rooms or areas with entry-related mode applicability identified)	RA3.2	An UNPLANNED event results in radiation levels that prohibit or IMPEDE access to any Table R-2 rooms or areas (Note 5)	Table R-2 contains the site-specific list of plant rooms or areas with entry-related mode applicability identified.
Note	If the equipment in the listed room or area was already inoperable or out-of-service	Note 5	If the equipment in the listed room or area was already inoperable or out-of-service before the event occurred,	None

	before the event occurred, then no emergency classification is warranted.		then no emergency classification is warranted.	

Table R-2 Safe Operation & Shutdown Rooms/Areas			
Bldg. Elevation	**Unit 1 Room/Area**	**Unit 2 Room/Area**	**Modes**
Auxiliary 716'	P/C, RHole, near 1NI-185, Outside CAD 212	ABPC thru CAD Door, FF59	4
Auxiliary 750'	800 (1EMXA)	820 (2EMXA)	3, 4
	803 (1ETA)	805 (2ETA)	3, 4
Auxiliary 733'	702 (Elec. Pene.)	713 (Elec. Pene.)	3
	722 (1EMXB-1)	724 (2EMXB-1)	3, 4
	705 (1ETB)	716 (2ETB)	3, 4

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
AS1	Release of gaseous radioactivity resulting in offsite dose greater than 100 mrem TEDE or 500 mrem thyroid CDE MODE: All MODE: All	RS1	Release of gaseous radioactivity resulting in offsite dose greater than 100 mrem TEDE or 500 mrem thyroid CDE MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer: (site-specific monitor list and threshold values)	RS1.1	Reading on **any** Table R-1 effluent radiation monitor > column "SAE" for ≥ 15 min. (Notes 1, 2, 3, 4)	The MNS radiation monitors that detect radioactivity effluent release to the environment are listed in Table R-1. UE, Alert, SAE and GE thresholds for all MNS continuously monitored gaseous and liquid release pathways are listed in Table R-1 to consolidate the information in a single location and, thereby, simplify identification of the thresholds by the EAL-user.
2	Dose assessment using actual meteorology indicates doses greater than 100 mrem TEDE or 500 mrem thyroid CDE at or beyond (site-specific dose receptor point)	RS1.2	Dose assessment using actual meteorology indicates doses > 100 mrem TEDE or 500 mrem thyroid CDE at or beyond the SITE BOUNDARY (Notes 3, 4)	The site boundary is the site-specific receptor point.
3	Field survey results indicate **EITHER** of the following at or beyond (site-specific dose receptor point): • Closed window dose rates greater than 100 mR/hr expected to continue for 60 minutes or longer. • Analyses of field survey samples indicate thyroid	RS1.3	Field survey results indicate **EITHER** of the following at or beyond the SITE BOUNDARY: • Closed window dose rates > 100 mR/hr expected to continue for ≥ 60 min. • Analyses of field survey samples indicate thyroid CDE > 500 mrem for 60 min. of	The site boundary is the site-specific receptor point.

	CDE greater than 500 mrem for one hour of inhalation.		inhalation. (Notes 1, 2)	
Notes	• The Emergency Director should declare the Site Area Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. • If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. • The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.		Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded. Note 2: If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded the specified time limit. Note 3: 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. Note 4 The pre-calculated effluent monitor values presented in EALs RA1.1, RS1.1 and RG1.1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. None Incorporated site-specific EAL numbers associated with generic EAL#1.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
AS2	Spent fuel pool level at (site-specific Level 3 description) MODE: All	RS2	Spent fuel pool level at the top of the fuel racks	Top of the fuel racks is the site-specific Level 3 description.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Lowering of spent fuel pool level to (site-specific Level 3 value)	RS2.1	Spent fuel pool level ≤ -25 ft. (746 ft. ele.) (KFP5350 or NVPG6530)	Post-Fukushima order EA-12-051 (ref.1) required the installation of reliable SFP level indication capable of identifying normal level (Level 1), SFP level 10 ft. above the top of the fuel racks (Level 2) and SFP level at the top of the fuel racks (Level 3). For MNS SFP Level 3 is -25 ft. (746 ft. ele.) as indicated on KFP5350 or NVPG6530. Deleted "Lowering of..." as level at or below Level 2 can only be attained by lowering water level.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
AG1	Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE. MODE: All	RG1	Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer: (site-specific monitor list and threshold values)	RG1.1	Reading on **any** Table R-1 effluent radiation monitor > column "GE" for ≥ 15 min. (Notes 1, 2, 3, 4)	The MNS radiation monitors that detect radioactivity effluent release to the environment are listed in Table R-1. UE, Alert, SAE and GE thresholds for all MNS continuously monitored gaseous or liquid release pathways are listed in Table R-1 to consolidate the information in a single location and, thereby, simplify identification of the thresholds by the EAL-user.
2	Dose assessment using actual meteorology indicates doses greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE at or beyond (site-specific dose receptor point).	RG1.2	Dose assessment using actual meteorology indicates doses > 1,000 mrem TEDE or 5,000 mrem thyroid CDE at or beyond the SITE BOUNDARY (Notes 3, 4)	The site boundary is the site-specific receptor point.
3	Field survey results indicate **EITHER** of the following at or beyond (site-specific dose receptor point): • Closed window dose rates greater than 1,000 mR/hr expected to continue for 60 minutes or longer. • Analyses of field survey samples indicate thyroid CDE greater than 5,000 mrem for	RG1.3	Field survey results indicate **EITHER** of the following at or beyond the SITE BOUNDARY: • Closed window dose rates > 1,000 mR/hr expected to continue for ≥ 60 min. • Analyses of field survey samples indicate thyroid CDE > 5,000 mrem for 60 min. of inhalation.	The site boundary is the site-specific receptor point.

	one hour of inhalation.		(Notes 1, 2)	
Notes	• The Emergency Director should declare the Site Area Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. • If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. • The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.		Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded. Note 2: If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded the specified time limit. Note 3: 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. Note 4 The pre-calculated effluent monitor values presented in EALs RA1.1, RS1.1 and RG1.1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. None Incorporated site-specific EAL numbers associated with generic EAL#1.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
AG2	Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longe MODE: All	RG2	Spent fuel pool level cannot be restored to at least the top of the fuel racks for 60 minutes or longer	Top of the fuel racks is the site-specific Level 3 description.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for 60 minutes or longer	RG2.1	Spent fuel pool level cannot be restored to ≥ -25 ft. (746 ft. ele.) (KFP5350 or NVPG6530) for ≥ 60 min. (Note 1)	Post-Fukushima order EA-12-051 (ref.1) required the installation of reliable SFP level indication capable of identifying normal level (Level 1), SFP level 10 ft. above the top of the fuel racks (Level 2) and SFP level at the top of the fuel racks (Level 3). For MNS SFP Level 3 is plant elevation -25 ft. (746 ft. ele.) as indicated on KFP5350 or NVPG6530 Replaced "to at least" with "≥"
Note	The Emergency Director should declare the General Emergency promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

Category C

Cold Shutdown / Refueling System Malfunction

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CU1	UNPLANNED loss of (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) inventory for 15 minutes or longer. MODE: Cold Shutdown, Refueling	CU1	UNPLANNED loss of NCS inventory for 15 minutes or longer MODE: 5 - Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	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.	CU1.1	UNPLANNED loss of reactor coolant results in NCS water level less than a required lower limit for ≥ 15 min. (Note 1)	None
2	a. (Reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level cannot be monitored. **AND** b. UNPLANNED increase in (site-specific sump and/or tank) levels.	CU1.2	NCS water level cannot be monitored **AND EITHER** • UNPLANNED increase in Containment Floor or Equipment Sump due to a loss of NCS inventory • Visual observation of UNISOLABLE NCS leakage	Added the phrase "due to a loss of NCS inventory" because the NEI basis states: "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 NCS." Added bulleted criteria "Visual observation of UNISOLABLE NCS leakage" to include direct observation of NCS leakage.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

			limit has been exceeded, or will likely be exceeded.	

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CU2	Loss of all but one AC power source to emergency buses for 15 minutes or longer. MODE: Cold Shutdown, Refueling, Defueled	CU2	Loss of all but one AC power source to essential buses for 15 minutes or longer. MODE: 6 - Cold Shutdown, 6 - Refueling, NM - No Mode	The MNS essential buses are the site-specific emergency buses.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer. **AND** b. Any additional single power source failure will result in loss of all AC power to SAFETY SYSTEMS.	CU2.1	AC power capability, Table C-2, to essential 4160V buses 1(2)ETA and 1(2)ETB reduced to a single power source for ≥ 15 min. (Note 1) **AND** **Any** additional single power source failure will result in loss of **all** AC power to SAFETY SYSTEMS	4160V buses 1(2)ETA and 1(2)ETB are the site-specific emergency buses. Site-specific AC power sources are listed in Table C-2.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

Table C-2 AC Power Sources
Offsite: • ATC (Train A) • SATA (Train A) • ATD (Train B) • SATB (Train B) **Onsite:** • D/G 1(2) A (Train A) • D/G 1(2) B (Train B)

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CU3	UNPLANNED increase in RCS temperature MODE: Cold Shutdown, Refueling	CU3	UNPLANNED increase in NCS temperature MODE: Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit)	CU3.1	UNPLANNED increase in NCS temperature to > 200°F due to loss of decay heat removal capability	200°F is the site-specific Tech. Spec. cold shutdown temperature limit. Added "due to loss of decay heat removal capability" to reinforce the generic bases that states "EAL #1 involves a loss of decay heat removal capability"
2	Loss of **ALL** RCS temperature and (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level indication for 15 minutes or longer.	CU3.2	Loss of **all** NCS temperature and NCS level indication for ≥ 15 min. (Note 1)	None
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CU4	Loss of Vital DC power for 15 minutes or longer. MODE: Cold Shutdown, Refueling	CU4	Loss of Vital DC power for 15 minutes or longer. MODE: 5 - Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Indicated voltage is less than (site-specific bus voltage value) on required Vital DC buses for 15 minutes or longer.	CU4.1	< 105 VDC bus voltage indications on Technical Specification **required** 125 VDC buses for ≥ 15 min. (Note 1)	105 VDC is the site-specific minimum vital DC bus voltage. DC operability requirements are specified in Technical Specifications.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CU5	Loss of all onsite or offsite communications capabilities. MODE: Cold Shutdown, Refueling, Defueled	CU5	Loss of **all** onsite or offsite communications capabilities. MODE: Cold Shutdown, 6 - Refueling, NM - No Mode	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss of **ALL** of the following onsite communication methods: (site specific list of communications methods)	CU5.1	Loss of **all** Table C-4 onsite communication methods **OR** Loss of **all** Table C-4 ORO communication methods **OR** Loss of **all** Table C-4 NRC communication methods	Example EALs #1, 2 and 3 have been combined into a single EAL for simplification of presentation. Table C-4 provides a site-specific list of onsite, ORO and NRC communications methods.
2	Loss of **ALL** of the following ORO communications methods: (site specific list of communications methods)			
3	Loss of **ALL** of the following NRC communications methods: (site specific list of communications methods)			

Table C-4 Communication Methods			
System	**Onsite**	**ORO**	**NRC**
Public Address	X		
Internal Telephones	X		
Onsite Radios	X		
DEMNET		X	
Offsite Radio System		X	
Commercial Telephones		X	X
NRC Emergency Telephone System (ETS)			X

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CA1	Loss of (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) inventory MODE: Cold Shutdown, Refueling	CA1	Loss of NCS inventory MODE: Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss of (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) inventory as indicated by level less than (site-specific level).	CA1.1	Loss of NCS inventory as indicated by NCS water level < 5 in. above hotleg centerline	5.1 in. above hotleg centerline (rounded to 5 in.) NCS level indication is the lowest level to assure adequate net positive suction head and prevent ND pump cavitation for all flow rates.
2	a. (Reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level cannot be monitored for 15 minutes or longer **AND** b. UNPLANNED increase in (site-specific sump and/or tank) levels due to a loss of (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) inventory.	CA1.2	NCS water level cannot be monitored for ≥ 15 min. (Note 1) **AND EITHER** • UNPLANNED increase in Containment Floor or Equipment Sump due to a loss of NCS inventory • Visual observation of UNISOLABLE NCS leakage	Added the phrase "due to a loss of NCS inventory" because the NEI basis states: "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 NCS." Added bulleted criteria "Visual observation of UNISOLABLE NCS leakage" to include direct observation of NCS leakage.
Note	The Emergency Director should declare the Alert promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CA2	Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer MODE: Cold Shutdown, Refueling, Defueled	CA2	Loss of **all** offsite and **all** onsite AC power to essential buses for 15 minutes or longer. MODE: Cold Shutdown, 6 - Refueling, NM - No Mode	The MNS essential buses are the emergency buses.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss of **ALL** offsite and **ALL** onsite AC Power to (site-specific emergency buses) for 15 minutes or longer.	CA2.1	Loss of **all** offsite and **all** onsite AC power capability, Table C-2, to essential 4160V buses 1(2)ETA and 1(2)ETB for ≥ 15 min. (Note 1)	4160V buses 1(2)ETA and 1(2)ETB are the site-specific emergency buses. Site-specific AC power sources are tabularized in Table C-2.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CA3	Inability to maintain the plant in cold shutdown. MODE: Cold Shutdown, Refueling	CA3	Inability to maintain the plant in cold shutdown. MODE: Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit) for greater than the duration specified in the following table.	CA3.1	UNPLANNED increase in NCS temperature to > 200°F for > Table C-3 duration (Note 1) **OR** UNPLANNED NCS pressure increase > 20 psig due to a loss of NCS cooling (this does **not** apply during water-solid plant conditions)	Example EALs #1 and #2 have been combined into a single EAL as EAL # is the alternative threshold based on a loss of NCS temperature indication. 200°F is the site-specific Tech. Spec. cold shutdown temperature limit. Table C-3 is the site-specific implementation of the generic NCS Heat-up Duration Threshold table. 20 psig is the site-specific pressure increase readable by Control Room indications.
2	UNPLANNED RCS pressure increase greater than (site-specific pressure reading). (This EAL does not apply during water-solid plant conditions. [*PWR*])			
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

Table: RCS Heat-up Duration Thresholds		
RCS Status	**Containment Closure Status**	**Heat-up Duration**
Intact (but not at reduced inventory [*PWR*])	Not applicable	60 minutes*
Not intact (or at reduced inventory [*PWR*])	Established	20 minutes*
	Not Established	0 minutes
* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, the EAL is not applicable.		

Table C-3: NCS Heat-up Duration Thresholds		
NCS Status	**Containment Closure Status**	**Heat-up Duration**
Intact (but **not** reduced inventory)	N/A	60 min.*
Not intact **OR** At reduced inventory	established	20 min.*
	not established	0 min.
* If an NCS heat removal system is in operation within this time frame and NCS temperature is being reduced, the EAL is **not** applicable.		

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CA6	Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode. MODE: Cold Shutdown, Refueling	CA6	Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode. MODE: 5 - Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. The occurrence of **ANY** of the following hazardous events: • Seismic event (earthquake) • Internal or external flooding event • High winds or tornado strike • FIRE • EXPLOSION • (site-specific hazards) • Other events with similar hazard characteristics as determined by the Shift Manager **AND** b. **EITHER** of the following: 1. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode. **OR** 2. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode.	CA6.1	The occurrence of **any** Table C-5 hazardous event **AND EITHER**: • Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode • The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode	The hazardous events have been tabularized in Table C-5.

Table C-5 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

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CS1	Loss of (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) inventory affecting core decay heat removal capability. MODE: Cold Shutdown, Refueling	CS1	Loss of NCS inventory affecting core decay heat removal capability MODE: Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. CONTAINMENT CLOSURE not established. **AND** b. (Reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level less than (site-specific level).	N/A	N/A	The design and operation of water level instrumentation is such that the "site-specific level" (6" below the bottom ID of the NCS loop) cannot be determined at any time during Cold Shutdown or Refueling modes, Classification is accomplished in accordance with EAL #3.
2	a. CONTAINMENT CLOSURE established. **AND** b. (Reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level less than (site-specific level).	N/A	N/A	The design and operation of water level instrumentation is such that the "site-specific level" (top of active fuel) cannot be determined at any time during Cold Shutdown or Refueling modes, Classification is accomplished in accordance with EAL #3.
3	a. (Reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level cannot be monitored for 30 minutes or longer. **AND** b. Core uncovery is indicated by **ANY** of the following:	CS1.1	NCS water level cannot be monitored for ≥ 30 min. (Note 1) **AND** Core uncovery is indicated by **any** of the following: • UNPLANNED increase in Containment Floor or Equipment Sump due to a	Added bulleted criteria "Visual observation of UNISOLABLE NCS leakage" to include direct observation of NCS leakage. 1EMF16 (2EMF3), Reactor Building Refueling Bridge Monitor is located in the containment in proximity to the reactor cavity and is designed to provide monitoring of radiation due to a fuel handling event or loss of shielding during refueling operations. If this radiation monitor reaches and exceeds 9,000 mR/hr (90% of instrument scale), a loss of inventory with potential to uncover the core is likely

	• (Site-specific radiation monitor) reading greater than (site-specific value) • Erratic source range monitor indication [*PWR*] • UNPLANNED increase in (site-specific sump and/or tank) levels of sufficient magnitude to indicate core uncovery • (Other site-specific indications)		loss of NCS inventory • Visual observation of unisolable NCS leakage • Reactor Building Refueling Bridge Monitor 1EMF16 (2EMF3) reading > 9,000 mR/hr (Mode 6) • Erratic Source Range or Wide Range Flux Monitor indication	to have occurred. 1EMF16 (2EMF3) Containment Building Refueling Bridge monitors are only operable in Mode 6 (Refueling). Erratic Wide Range Flux Monitor indication has been added to the MNS EAL because it may provide indication of core uncovery.
Note	The Emergency Director should declare the Site Area Emergency promptly upon determining that 30 minutes has been exceeded, or will likely be exceeded	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
CG1	Loss of (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) inventory affecting fuel clad integrity with containment challenged MODE: Cold Shutdown, Refueling	CG1	Loss of NCS inventory affecting fuel clad integrity with containment challenged MODE: Cold Shutdown, 6 - Refueling	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. (Reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level less than (site-specific level) for 30 minutes or longer. **AND** b. **ANY** indication from the Containment Challenge Table (see below).	N/A	N/A	The design and operation of water level instrumentation is such that the "site-specific level" (6" below the bottom ID of the NCS loop) cannot be determined at any time during Cold Shutdown or Refueling modes, Classification is accomplished in accordance with EAL #3.
2	a. (Reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level cannot be monitored for 30 minutes or longer. **AND** b. Core uncovery is indicated by **ANY** of the following: • (Site-specific radiation monitor) reading greater than (site-specific value) • Erratic source range monitor indication [*PWR*]	CG1.1	NCS water level cannot be monitored for ≥ 30 min. (Note 1) **AND** Core uncovery is indicated by **any** of the following: • UNPLANNED increase in Containment Floor or Equipment Sump level due to a loss of NCS inventory • Visual observation of UNISOLABLE NCS leakage • Reactor Building Refueling	Added bulleted criteria "Visual observation of UNISOLABLE NCS leakage" to include direct observation of NCS leakage. 1EMF16 (2EMF3), Reactor Building Refueling Bridge Monitor is located in the containment in proximity to the reactor cavity and is designed to provide monitoring of radiation due to a fuel handling event or loss of shielding during refueling operations. If this radiation monitor reaches and exceeds 9,000 mR/hr (90% of instrument scale), a loss of inventory with potential to uncover the core is likely to have occurred. 1EMF16 (2EMF3) Containment Building Refueling Bridge monitors are only operable in Mode 6 (Refueling). Erratic Wide Range Flux Monitor indication has been added to the MNS EAL because it may provide indication of core uncovery.

	• UNPLANNED increase in (site-specific sump and/or tank) levels of sufficient magnitude to indicate core uncovery • (Other site-specific indications) **AND** c. **ANY** indication from the Containment Challenge Table (see below).		Bridge Monitor 1EMF16 (2EMF3) reading > 9,000 mR/hr (Mode 6) • Erratic Source Range or Wide Range Flux Monitor indication **AND** **Any** Containment Challenge indication, Table C-1	Table C-1 provides a tabularized list of containment challenge indications. > 6% hydrogen concentration in the presence of oxygen represents an explosive mixture in containment.
Note	The Emergency Director should declare the General Emergency promptly upon determining that 30 minutes has been exceeded, or will likely be exceeded. N/A	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded. Note 6: If CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute time limit, declaration of a General Emergency is not required.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording. Note 6 implements the asterisked note associated with the generic Containment Challenge table.

Containment Challenge Table
■ CONTAINMENT CLOSURE not established*
■ (Explosive mixture) exists inside containment
■ UNPLANNED increase in containment pressure
■ Secondary containment radiation monitor reading above (site-specific value) [*BWR*]

* If CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute time limit, then declaration of a General Emergency is not required.

Table C-1 Containment Challenge Indications
• CONTAINMENT CLOSURE **not** established (Note 6) • Containment hydrogen concentration > 6% • UNPLANNED rise in containment pressure

Category D

Permanently Defueled Station Malfunction

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
PD-AU1 PD-AU2 PD-SU1 PD-HU1 PD-HU2 PD-HU3 PD-AA1 PD-AA2 PD-HA1 PD-HA3	Recognition Category D Permanently Defueled Station	N/A	N/A	NEI Recognition Category PD ICs and EALs are applicable only to permanently defueled stations. MNS is not a defueled station.

Category E

Independent Spent Fuel Storage Installation

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
E-HU1	Damage to a loaded cask CONFINEMENT BOUNDARY MODE: All	EU1	Damage to a loaded cask CONFINEMENT BOUNDARY MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	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.	EU1.1	Damage to a loaded canister CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading on the surface of a loaded spent fuel cask > any Table E-1 dose limit	The values shown in Table E-1 represent 2 times the limits specified in the ISFSI Certificate of Compliance Technical Specification for radiation external to a loaded TSC for the NAC MAGNASTOR, NAC-UMS and TN casks.

Table E-1 ISFSI Dose Limits

NAC Magnastor	NAC UMS	Transnuclear (TN-32)
• 190 mrem/hr (gamma) on the side of the cask (excludes air inlet/outlet ports) • 10 mrem/hr (neutron) on the side of the cask (excludes air inlet/outlet ports) • 900 mrem/hr (neutron + gamma) on the top of the cask (excludes air inlet/outlet ports)	• 100 mrem/hr (neutron + gamma) on the side of the cask • 100 mrem/hr (neutron + gamma) on the top of the cask • 200 mrem/hr (neutron + gamma) at air inlets and outlets	• 120 mrem/hr (gamma) or 20 mrem/hr (neutron) on top of the cask • 340 mrem/hr (gamma) or 40 mrem/hr (neutron) on the sides of the radial neutron shield • 560 mrem/hr (gamma) or 280 mrem/hr (neutron) on the side surfaces above the radial neutron shield region • 220 mrem/hr (gamma) or 400 mrem/hr (neutron) on the side surfaces below the radial neutron shield region

Category F

Fission Product Barrier Degradation

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
FA1	Any Loss or any Potential Loss of either the Fuel Clad or RCS barrier. MODE: Power Operation, Hot Standby, Startup, Hot Shutdown	FA1	**Any** loss or **any** potential loss of either Fuel Clad or NCS MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Any Loss or any Potential Loss of either the Fuel Clad or RCS barrier.	FA1.1	**Any** loss **OR any** potential loss of either Fuel Clad or NCS (Table F-1)	Table F-1 provides the fission product barrier loss and potential loss thresholds.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
FS1	Loss or Potential Loss of any two barriers MODE: Power Operation, Hot Standby, Startup, Hot Shutdown	FS1	Loss or potential loss of **any** two barriers MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss or Potential Loss of any two barriers	FS1.1	Loss **OR** potential loss of **any** two barriers	Table F-1 provides the fission product barrier loss and potential loss thresholds.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
FG1	Loss of any two barriers and Loss or Potential Loss of third barrier MODE: Power Operation, Hot Standby, Startup, Hot Shutdown	FG1	Loss of **any** two barriers and loss or potential loss of the third barrier MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss of any two barriers and Loss or Potential Loss of third barrier	FG1.1	Loss of **any** two barriers **AND** Loss **OR** potential loss of the third barrier (Table F-1)	Table F-1 provides the fission product barrier loss and potential loss thresholds.

PWR Fuel Clad Fission Product Barrier Degradation Thresholds

NEI FPB#	NEI Threshold Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
FC Loss 1	**RCS or SG Tube Leakage** Not Applicable	N/A	N/A	N/A
FC Loss 2	**Inadequate Heat Removal** A. Core exit thermocouple readings greater than (site-specific temperature value).	FC Loss B.1	Core Cooling-RED Path conditions met	Consistent with the generic developers note options CSFST Core Cooling Red Path is used in lieu of CET temperatures.
FC Loss 3	**RCS Activity/CMNT Rad** A. Containment radiation monitor reading greater than (site-specific value) **OR** B. (Site-specific indications that reactor coolant activity is greater than 300 µCi/gm dose equivalent I-131)	FC Loss C.1	EMF51A/B > Table F-2 column "FC Loss"	EMF51A/B are the site-specific containment high range radiation monitors. The Table F-2 values, column FC Loss represents, based on core damage assessment procedure, the expected containment high range radiation monitor (EMF51A & B) response based on a LOCA, for periods of 1, 2 and 8 hours after shutdown, no sprays and NCS pressure < 1600 psig with ~2% fuel failure.
		FC Loss C.2	Dose equivalent I-131 coolant activity > 300 µCi/gm	None
FC Loss 4	**CNMT Integrity or Bypass** Not Applicable	N/A	N/A	N/A
FC Loss 5	**Other Indications** A. (site-specific as applicable)	N/A	N/A	No other site-specific Fuel Clad Loss indication has been identified for MNS.

NEI FPB#	NEI Threshold Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
FC Loss 6	**ED Judgment** A. **ANY** condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	FC Loss E.1	**Any** condition in the opinion of the Emergency Coordinator/EOF Director that indicates loss of the fuel clad barrier	None
FC P-Loss 1	**RCS or SG Tube Leakage** A. RCS/reactor vessel level less than (site-specific level)	N/A	N/A	See FC P-Loss B.1. The NCS level threshold is implemented as CSFST Core Cooling Orange Path conditions met.
FC P-Loss 2	**Inadequate Heat Removal** A. Core exit thermocouple readings greater than (site-specific temperature value) **OR** B. Inadequate RCS heat removal capability via steam generators as indicated by (site-specific indications).	FC P-Loss B.1	Core Cooling-ORANGE Path conditions met	Consistent with the generic developers note options CSFST Core Cooling Orange Path is used in lieu of CET temperatures.
		FC P-Loss B.2	Heat Sink-RED Path conditions met **AND** Heat sink is required	Consistent with the generic developers note options CSFST Heat Sink Red Path is used. The phrase "and heat sink required" was added to preclude the need for classification for conditions in which NCS pressure is less than SG pressure or Heat Sink-RED path entry was created through operator action directed by an EOP.
FC P-Loss 3	**RCS Activity/CMNT Rad** Not Applicable	N/A	N/A	N/A
FC P-Loss 4	**CNMT Integrity or Bypass** Not Applicable	N/A	N/A	N/A
FC P-Loss 5	**Other Indications** A. (site-specific as applicable)	N/A	N/A	No other site-specific Fuel Clad Potential Loss indication has been identified for MNS.

NEI FPB#	NEI Threshold Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
FC P-Loss 6	**Emergency Director Judgment** A. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.	FC P-Loss E.1	**Any** condition in the opinion of the Emergency Coordinator/EOF Director that indicates potential loss of the fuel clad barrier	None

Table F-2 Containment Radiation – R/hr (EMF51A & B)			
Time After S/D (Hrs.)	NCS Loss	FC Loss	CMT Potential Loss
0-1	8.8	550	5500
1-2	8.4	400	4000
2-8	7.0	160	1600
>8	6.2	100	1000

PWR RCS Fission Product Barrier Degradation Thresholds

NEI FPB#	NEI IC Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
RCS Loss 1	**RCS or SG Tube Leakage** A. An automatic or manual ECCS (SI) actuation is required by **EITHER** of the following: 1. UNISOLABLE RCS leakage **OR** 2. SG tube RUPTURE.	NCS Loss A.1	An automatic or manual ECCS (SI) actuation required by **EITHER:** • UNISOLABLE NCS leakage • SG tube RUPTURE	None
RCS Loss 2	**Inadequate Heat Removal** Not Applicable	N/A	N/A	N/A
RCS Loss 3	**RCS Activity/CMNT Rad** A. Containment radiation monitor reading greater than (site-specific value).	NCS Loss C.1	EMF51A/B > Table F-2 column "NCS Loss"	EMF51A/B are the site-specific containment high range radiation monitors. The Table F-2 values, column NCS Loss represents, represents, based on core damage assessment procedure RP/0/A/5700/015 Figure 1, the expected containment high range radiation monitor (EMF51A & B) response based on a LOCA, for periods of 1, 2 and 8 hours after shutdown with no fuel failure.
RCS Loss 4	**CNMT Integrity or Bypass** Not Applicable	N/A	N/A	N/A
RCS Loss 5	**Other Indications** A. (site-specific as applicable)	N/A	N/A	No other site-specific NCS Loss indication has been identified for MNS.

NEI FPB#	NEI IC Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
RCS Loss 6	**Emergency Director Judgment** A. **ANY** condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.	NCS Loss E.1	**Any** condition in the opinion of the Emergency Coordinator/EOF Director that indicates loss of the NCS barrier	None
RCS P-Loss 1	**RCS or SG Tube Leakage** A. Operation of a standby charging (makeup) pump is required by **EITHER** of the following: 1. UNISOLABLE RCS leakage **OR** 2. SG tube leakage. **OR** B. RCS cooldown rate greater than (site-specific pressurized thermal shock criteria/limits defined by site-specific indications).	NCS P-Loss A.1	Operation of a standby charging pump is required by **EITHER:** • UNISOLABLE NCS leakage • SG tube leakage	None
		NCS P-Loss A.2	Integrity-RED Path conditions met	Consistent with the generic developers note options CSFST Integrity Red Path is used.
RCS P-Loss 2	**Inadequate Heat Removal** A. Inadequate RCS heat removal capability via steam generators as indicated by (site-specific indications).	NCS P-Loss B.1	Heat Sink-RED Path conditions met **AND** Heat sink is required	Consistent with the generic developers note options CSFST Heat Sink Red Path is used. The phrase "and heat sink required" was added to preclude the need for classification for conditions in which NCS pressure is less than SG pressure or Heat Sink-RED path entry was created through operator action directed by an EOP.
RCS P-Loss 3	**CS Activity/CMNT Rad** Not Applicable	N/A	N/A	N/A

NEI FPB#	NEI IC Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
RCS P-Loss 4	**CNMT Integrity or Bypass** Not Applicable	N/A	N/A	N/A
RCS P-Loss 5	**Other Indications** A. (site-specific as applicable)	N/A	N/A	No other site-specific NCS Potential Loss indication has been identified for MNS.
RCS P-Loss 6	**Emergency Director Judgment** A. **ANY** condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.	NCS P-Loss E.1	**Any** condition in the opinion of the Emergency Coordinator/EOF Director that indicates potential loss of the NCS barrier	None

PWR Containment Fission Product Barrier Degradation Thresholds

NEI FPB#	NEI IC Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
CNMT Loss 1	**RCS or SG Tube Leakage** A. A leaking or RUPTURED SG is FAULTED outside of containment.	CNMT Loss A.1	A leaking or RUPTURED SG is FAULTED outside of containment	None
CNMT Loss 2	**Inadequate Heat Removal** Not Applicable	N/A	N/A	N/A
CNMT Loss 3	**RCS Activity/CMNT Rad** Not applicable	N/A	N/A	N/A
CNMT Loss 4	**CNMT Integrity or Bypass** A. Containment isolation is required **AND** **EITHER** of the following: 1. Containment integrity has been lost based on Emergency Director judgment. **OR** 2. UNISOLABLE pathway from the containment to the environment exists. **OR** B. Indications of RCS leakage outside of containment.	CNMT Loss D.1	Containment isolation is required **AND EITHER:** • Containment integrity has been lost based on EC judgment • UNISOLABLE pathway from containment to the environment exists	None
		CNMT Loss D.2	Indications of NCS leakage outside of containment	None

NEI FPB#	NEI IC Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
CNMT Loss 5	**Other Indications** A. (site-specific as applicable)	N/A	N/A	No other site-specific Containment Loss indication has been identified for MNS.
CNMT Loss 6	**Emergency Director Judgment** **ANY** condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.	CNMT Loss E.1	**Any** condition in the opinion of the Emergency Coordinator/EOF Director that indicates loss of the containment barrier	None
CNMT P-Loss 1	**RCS or SG Tube Leakage** Not Applicable	N/A	N/A	N/A
CNMT P-Loss 2	**Inadequate Heat Removal** A. 1. (Site-specific criteria for entry into core cooling restoration procedure) **AND** 2. Restoration procedure not effective within 15 minutes.	CNMT P-Loss B.1	Core Cooling-RED Path conditions met **AND** Restoration procedures **not** effective within 15 min. (Note 1)	Consistent with the generic developers note options CSFST Core Cooling Red Path is used in lieu of CET temperatures and NCS levels. Added Note 1 consistent with other thresholds with a timing component.
CNMT P-Loss 3	**RCS Activity/CMNT Rad** A. Containment radiation monitor reading greater than (site-specific value).	CNMT P-Loss C.1	EMF51A/B > Table F-2 column "CMT Potential Loss"	EMF51A/B are the site-specific containment high range radiation monitors. The Table F-2 values, column CMT Potential Loss represents, based on core damage assessment procedure, the expected containment high range radiation monitor (EMF51A & B) response based on a LOCA, for periods of 1, 2 and 8 hours after shutdown, no sprays and NCS pressure < 1600 psig with ~20% fuel failure.

NEI FPB#	NEI IC Wording	MNS FPB #(s)	MNS FPB Wording	Difference Justification
CNMT P-Loss 4	**CNMT Integrity or Bypass** A. Containment pressure greater than (site-specific value) **OR** B. Explosive mixture exists inside containment **OR** C. 1. Containment pressure greater than (site-specific pressure setpoint) **AND** 2. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer.	CNMT P-Loss D.1	Containment-RED Path conditions me	Consistent with the generic developers note options CSFST Containment Red Path is used in lieu of containment pressure.
		CNMT P-Loss D.2	Containment hydrogen concentration > 6%	> 6% hydrogen concentration in the presence of oxygen represents an explosive mixture in containment.
		CNMT P-Loss D.3	Containment pressure > 3 psig with < one full train of containment cooling operating per design for > 15 min. (Note 1)	The Containment pressure setpoint (3 psig) is the pressure at which the Containment Spray System should actuate and begin performing its function. Added Note 1 consistent with other thresholds with a timing component.
CNMT P-Loss 5	**Other Indications** A. (site-specific as applicable)	N/A	N/A	No other site-specific Containment Potential Loss indication has been identified for MNS.
CNMT P-Loss 6	**Emergency Director Judgment** A. **ANY** condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.	CNMT P-Loss E.1	**Any** condition in the opinion of the Emergency Coordinator/EOF Director that indicates potential loss of the containment barrier	None

Category H

Hazards and Other Conditions Affecting Plant Safety

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HU1	Confirmed SECURITY CONDITION or threat MODE: All	HU1	Confirmed SECURITY CONDITION or threat. MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the (site-specific security shift supervision).	HU1.1	A SECURITY CONDITION that does **not** involve a HOSTILE ACTION as reported by the Security Shift Supervision **OR** Notification of a credible security threat directed at the site **OR** A validated notification from the NRC providing information of an aircraft threat	Example EALs #1, 2 and 3 have been combined into a single EAL for ease of presentation and use. The Security Shift Supervision is defined as the Security Shift Supervision.
2	Notification of a credible security threat directed at the site.			
3	A validated notification from the NRC providing information of an aircraft threat.			

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HU2	Seismic event greater than OBE levels MODE: All	HU2	Seismic event greater than OBE levels MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Seismic event greater than Operating Basis Earthquake (OBE) as indicated by: (site-specific indication that a seismic event met or exceeded OBE limits)	HU2.1	Seismic event > OBE as indicated by OBE EXCEEDED alarm on 1AD-13, E7	The MNS OBE indicator is the OBE EXCEEDED alarm on 1AD-13, E7.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HU3	Hazardous event. MODE: All	HU3	Hazardous event MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	A tornado strike within the PROTECTED AREA.	HU3.1	A tornado strike within the PROTECTED AREA	None
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.	HU3.2	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	None
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).	HU3.3	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)	None
4	A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles.	HU3.4	A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles (Note 7)	Added reference to Note 7.
5	(Site-specific list of natural or technological hazard events)	N/A	N/A	No other site-specific hazard has been identified for MNS.
Note	EAL #3 does not apply to routine traffic impediments such as fog,	N/A	Note 7: This EAL does not apply to routine traffic	This note, designated Note #7, is intended to apply to generic example EAL #4, not #3 as specified in the generic guidance.

	snow, ice, or vehicle breakdowns or accidents.		impediments such as fog, snow, ice, or vehicle breakdowns or accidents.	

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HU4	FIRE potentially degrading the level of safety of the plant. MODE: All	HU4	FIRE potentially degrading the level of safety of the plant MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. A FIRE is NOT extinguished within 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 **AND** b. The FIRE is located within **ANY** of the following plant rooms or areas: (site-specific list of plant rooms or areas)	HU4.1	A FIRE is **not** extinguished within 15 min. of **any** of the following FIRE detection indications (Note 1): • 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 **AND** The FIRE is located within **any** Table H-1 area	Table H-1 provides a tabularized list of site-specific fire areas.
2	a. Receipt of a single fire alarm (i.e., no other indications of a FIRE). **AND** b. The FIRE is located within	HU4.2	Receipt of a single fire alarm (i.e., **no** other indications of a FIRE) **AND** The fire alarm is indicating a	Table H-1 provides a list of site-specific fire areas.

	ANY of the following plant rooms or areas: (site-specific list of plant rooms or areas) **AND** c. The existence of a FIRE is not verified within 30-minutes of alarm receipt.		FIRE within **any** Table H-1 area **AND** The existence of a FIRE is **not** verified within 30 min. of alarm receipt (Note 1)	
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.	HU4.3	A FIRE within the plant PROTECTED AREA **not** extinguished within 60 min. of the initial report, alarm or indication (Note 1)	MNS has an ISFSI located inside the plant Protected Area.
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.	HU4.4	A FIRE within the plant PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish	MNS has an ISFSI located inside the plant Protected Area.
Note	**Note:** The Emergency Director should declare the Unusual Event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

Table H-1 **Fire Areas**
• Containment • Auxiliary Building • Diesel Generator Rooms • FWST • Dog Houses • Standby Shutdown Facility (SSF)

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HU7	Other conditions exist which in the judgment of the Emergency Director warrant declaration of a (NO)UE MODE: All	HU7	Other conditions existing that in the judgment of the Emergency/EOF Director Coordinator warrant declaration of a UE MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	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.	HU7.1	Other conditions exist which in the judgment of the Emergency Coordinator/EOF 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.	None

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HA1	HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes. MODE: All	HA1	HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the (site-specific security shift supervision).	HA1.1	A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervision **OR** A validated notification from NRC of an aircraft attack threat within 30 min. of the site	Example EALs #1 and #2 have been combined into a single EAL for ease of use. The Security Shift Supervision is the site-specific security shift supervision.
2	A validated notification from NRC of an aircraft attack threat within 30 minutes of the site.			

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HA5	Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown. MODE: All	N/A	Gaseous release IMPEDING access to equipment necessary for normal plant operations, cooldown or shutdown. MODE: 3 - Hot Standby, 4 – Hot Shutdown	Mode applicability has been limited to the Table H-2 applicable modes of 3 - Hot Standby and 4 – Hot Shutdown.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
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) **AND** b. Entry into the room or area is prohibited or impeded.	HA5.1	Release of a toxic, corrosive, asphyxiant or flammable gas into **any** Table H-2 rooms or areas **AND** Entry into the room or area is prohibited or IMPEDED (Note 5)	Table H-2 provides a list of safe shutdown rooms/areas and applicable operating modes.
Note	**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.	Note 5	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.	None

Table H-2 Safe Operation & Shutdown Rooms/Areas			
Bldg. Elevation	**Unit 1 Room/Area**	**Unit 2 Room/Area**	**Modes**
Auxiliary 716'	P/C, RHole, near 1NI-185, Outside CAD 212	ABPC thru CAD Door, FF59	4
Auxiliary 750'	800 (1EMXA)	820 (2EMXA)	3, 4
	803 (1ETA)	805 (2ETA)	3, 4
Auxiliary 733'	702 (Elec. Pene.)	713 (Elec. Pene.)	3
	722 (1EMXB-1)	724 (2EMXB-1)	3, 4
	705 (1ETB)	716 (2ETB)	3, 4

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HA6	Control Room evacuation resulting in transfer of plant control to alternate locations. MODE: All	HA6	Control Room evacuation resulting in transfer of plant control to alternate locations MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	An event has resulted in plant control being transferred from the Control Room to (site-specific remote shutdown panels and local control stations).	HA6.1	An event has resulted in plant control being transferred from the Control Room to the Auxiliary Shutdown Panels or Standby Shutdown Facility (SSF)	The Auxiliary Shutdown Panels and Standby Shutdown Facility (SSF) are the site-specific remote shutdown panels/local control stations.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HA7	Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert. MODE: All	HA7	Other conditions exist that in the judgment of the Emergency Coordinator/EOF Director warrant declaration of an Alert MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	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.	HA7.1	Other conditions exist which, in the judgment of the Emergency Coordinator/EOF 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.	None

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HS1	HOSTILE ACTION within the PROTECTED AREA MODE: All	HS1	HOSTILE ACTION within the PROTECTED AREA MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-specific security shift supervision).	HS1.1	A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervision	The Security Shift Supervision is the site-specific security shift supervision.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HS6	Inability to control a key safety function from outside the Control Room. MODE: All	HS6	Inability to control a key safety function from outside the Control Room MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. An event has resulted in plant control being transferred from the Control Room to (site-specific remote shutdown panels and local control stations). **AND** b. Control of **ANY** of the following key safety functions is not reestablished within (site-specific number of minutes). • Reactivity control • Core cooling [*PWR*] / RPV water level [*BWR*] • RCS heat removal	HS6.1	An event has resulted in plant control being transferred from the Control Room to the Auxiliary Shutdown Panels or Standby Shutdown Facility (SSF) **AND** Control of **any** of the following key safety functions is **not** reestablished within 15 min. (Note 1): • Reactivity • Core cooling • NCS heat removal	The Auxiliary Shutdown Panels and Standby Shutdown Facility (SSF) are the site-specific remote shutdown panels/local control stations.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HS7	Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency. MODE: All	HS7	Other conditions existing that in the judgment of the Emergency Coordinator/EOF Director warrant declaration of a Site Area Emergency MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	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.	HS7.1	Other conditions exist which in the judgment of the Emergency Coordinator/EOF 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.	None

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HG1	HOSTILE ACTION resulting in loss of physical control of the facility. MODE: All	HG1	HOSTILE ACTION resulting in loss of physical control of the facility MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-specific security shift supervision). **AND** b. **EITHER** of the following has occurred: 1. **ANY** of the following safety functions cannot be controlled or maintained. • Reactivity control • Core cooling [*PWR*]/RPV water level [*BWR*] • RCS heat removal **OR** 2. Damage to spent fuel has occurred or is IMMINENT.	HG1.1	A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervision **AND EITHER** of the following has occurred: **Any** of the following safety functions cannot be controlled or maintained • Reactivity control • Core cooling • NCS heat removal **OR** Damage to spent fuel has occurred or is IMMINENT	The Security Shift Supervision is the site-specific security shift supervision.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
HG7	Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency MODE: All	HG7	Other conditions exist which in the judgment of the Emergency Coordinator/EOF Director warrant declaration of a General Emergency MODE: All	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or IMMINENT 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.	HG7.1	Other conditions exist which in the judgment of the Emergency Coordinator/EOF Director indicate that events are in progress or have occurred which involve actual or IMMINENT 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.	None

Category S

System Malfunction

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SU1	Loss of all offsite AC power capability to emergency buses for 15 minutes or longer. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SU1	Loss of **all** offsite AC power capability to essential buses for 15 minutes or longer MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss of **ALL** offsite AC power capability to (site-specific emergency buses) for 15 minutes or longer.	SU1.1	Loss of **all** offsite AC power capability, Table S-1, to essential 4,160V buses 1(2)ETA and 1(2)ETB for ≥ 15 min. (Note 1)	4,160V buses 1(2)ETA and 1(2)ETB are the site-specific emergency buses. Site-specific AC power sources are listed in Table S-1.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

Table S-1 AC Power Sources
Offsite: • ATC (Train A) • SATA (Train A) • ATD (Train B) • SATB (Train B) **Onsite:** • D/G 1(2) A (Train A) • D/G 1(2) B (Train B)

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SU2	UNPLANNED loss of Control Room indications for 15 minutes or longer. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SU3	UNPLANNED loss of Control Room indications for 15 minutes or longer. MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	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.	SU3.1	An UNPLANNED event results in the inability to monitor one or more Table S-2 parameters from within the Control Room for ≥ 15 min. (Note 1)	The site-specific Safety System Parameters are listed in Table S-2. Added "in at least one S/G" for auxiliary feed flow consistent with the S/G level parameter.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

[*BWR parameter list*]	[*PWR parameter list*]
Reactor Power	Reactor Power
RPV Water 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

Table S-2 Safety System Parameters
• Reactor power • NCS level • NCS pressure • Core exit T/C temperature • Level in at least one S/G • Auxiliary feed flow in at least one S/G

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SU3	Reactor coolant activity greater than Technical Specification allowable limits. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SU4	NCS activity greater than Technical Specification allowable limits MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	Changed 'reactor coolant activity" to "NCS activity" to conform to site specific terminology.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	(Site-specific radiation monitor) reading greater than (site-specific value).	N/A	N/A	MNS does not have any site-specific radiation monitor that can provide readings that correspond to TS coolant activity limits.
2	Sample analysis indicates that a reactor coolant activity value is greater than an allowable limit specified in Technical Specifications.	SU4.1	Dose Equivalent I-131 activity > 1 µCi/gm **OR** Dose Equivalent Xe-133 activity > 280 µCi/gm	Revised wording to list the MNS T.S. coolant activity limits. MNS T.S. Section 3.4.16 provides the TS allowable coolant activity limits.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SU4	RCS leakage for 15 minutes or longer. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SU5	NCS leakage for 15 minutes or longer MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	RCS unidentified or pressure boundary leakage greater than (site-specific value) for 15 minutes or longer.	SU5.1	NCS unidentified or pressure boundary leakage > 10 gpm for ≥ 15 min. **OR** NCS identified leakage > 25 gpm for ≥ 15 min. **OR** Leakage from the NCS to a location outside containment > 25 gpm for ≥ 15 min. (Note 1)	Example EALs #1, 2 and 3 have been combined into a single EAL for usability.
2	RCS identified leakage greater than (site-specific value) for 15 minutes or longer.			
3	Leakage from the RCS to a location outside containment greater than 25 gpm for 15 minutes or longer.			
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SU5	Automatic or manual (trip [PWR] / scram [BWR]) fails to shutdown the reactor. MODE: Power Operation	SU6	Automatic or manual trip fails to shut down the reactor MODE: 1 - Power Operation	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor. **AND** b. A subsequent manual action taken at the reactor control consoles is successful in shutting down the reactor.	SU6.1	An automatic trip did **not** shut down the reactor as indicated by reactor power ≥ 5% after **any** RPS setpoint is exceeded **AND** A subsequent automatic trip or manual trip action taken at the reactor control console (manual reactor trip switches or turbine manual trip) is successful in shutting down the reactor as indicated by reactor power < 5% (Note 8)	As specified in the generic developers guidance "Developers may include site-specific EOP criteria indicative of a successful reactor shutdown in an EAL statement, the Basis or both (e.g., a reactor power level)." Reactor power < 5% is the site-specific indication of a successful reactor trip. Added the words "... as indicated by reactor power ≥ 5% after **any** RPS setpoint is exceeded" to clarify that it is a failure of the automatic trip when a valid trip signal has been exceed. Manual reactor trip switches and turbine manual trip are the site-specific reactor control console trip switches credited for a successful manual trip.
2	a. A manual trip ([PWR] / scram [BWR]) did not shutdown the reactor. **AND** b. **EITHER** of the following: 1. A subsequent manual action taken at the reactor control consoles is successful in shutting	SU6.2	A manual trip did **not** shut down the reactor as indicated by reactor power ≥ 5% after **any** manual trip action was initiated **AND** A subsequent automatic trip or manual trip action taken at the reactor control console (manual reactor trip switches or turbine manual trip) is successful in	As specified in the generic developers guidance "Developers may include site-specific EOP criteria indicative of a successful reactor shutdown in an EAL statement, the Basis or both (e.g., a reactor power level)." Reactor power < 5% is the site-specific indication of a successful reactor trip. Added the words "... as indicated by reactor power ≥ 5% after **any** manual trip action was initiated" to clarify that it is a failure of any manual trip when an actual manual trip signal has been inserted. Combined conditions b.1 and b.2 into a single statement to simplify the presentation.

	down the reactor. **OR** 2 A subsequent automatic (trip [PWR] / scram [BWR]) is successful in shutting down the reactor.		shutting down the reactor as indicated by reactor power < 5% (Note 8)	Manual reactor trip switches and turbine manual trip are the site-specific reactor control console trip switches credited for a successful manual trip.
Notes	**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.	N/A	Note 8: 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.	None

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SU6	Loss of all onsite or offsite communications capabilities. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SU7	Loss of **all** onsite or offsite communications capabilities. MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss of **ALL** of the following onsite communication methods: (site-specific list of communications methods)	SU7.1	Loss of **all** Table S-4 onsite communication methods **OR** Loss of **all** Table S-4 ORO communication methods **OR** Loss of **all** Table S-4 NRC communication methods	Example EALs #1, 2 and 3 have been combined into a single EAL for simplification of presentation. Table S-4 provides a site-specific list of onsite, ORO and NRC communications methods.
2	Loss of **ALL** of the following ORO communications methods: (site-specific list of communications methods)			
3	Loss of **ALL** of the following NRC communications methods: (site-specific list of communications methods)			

Table S-4 Communication Methods			
System	**Onsite**	**ORO**	**NRC**
Public Address	X		
Internal Telephones	X		
Onsite Radios	X		
DEMNET		X	
Offsite Radio System		X	
Commercial Telephones		X	X
NRC Emergency Telephone System (ETS)			X

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SU7	Failure to isolate containment or loss of containment pressure control. [*PWR*] MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SU8	Failure to isolate containment or loss of containment pressure control MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. Failure of containment to isolate when required by an actuation signal. **AND** b. **ALL** required penetrations are not closed within 15 minutes of the actuation signal.	SU8.1	**EITHER**: **Any** penetration is not isolated within 15 min. of a VALID containment isolation signal **OR** Containment pressure > 3 psig with **EITHER** a failure of both trains of NS **OR** failure of both trains of VX-CARF for ≥ 15 min. (Note 1)	Reworded EAL to better describe the intent. Penetrations cannot close, but they can be isolated by closure of one or more isolation valves associated with that penetration. The revised wording maintains the generic example EAL intent while more clearly describing failure to isolate threshold. The containment pressure setpoint (3 psig) is the pressure at which the containment depressurization equipment (NS and VX-CARF) should actuate and begin performing its function.
2	a. Containment pressure greater than (site-specific pressure). **AND** b. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer.			
N/A	N/A	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event	Added Note 1 to be consistent in its use for EAL thresholds with a timing component.

			promptly upon determining that time limit has been exceeded, or will likely be exceeded.	

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SA1	Loss of all but one AC power source to emergency buses for 15 minutes or longer. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SA1	Loss of **all but one** AC power source to essential buses for 15 minutes or longer. MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer. **AND** b. Any additional single power source failure will result in a loss of all AC power to SAFETY SYSTEMS.	SA1.1	AC power capability, Table S-1, to essential 4160V buses 1(2)ETA and 1(2)ETB reduced to a single power source for ≥ 15 min. (Note 1) **AND** **Any** additional single power source failure will result in loss of **all** AC power to SAFETY SYSTEMS	4160V buses 1(2)ETA and 1(2)ETB are the site-specific emergency buses. Site-specific AC power sources are listed in Table S-1.
Note	The Emergency Director should declare the Alert promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

Table S-1 AC Power Sources
Offsite: • SATA (Train A) • ATC (Train A) • SATB (Train B) • ATD (Train B) **Onsite:** • D/G 1(2) A (Train A) • D/G 1(2) B (Train B)

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SA2	UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SA3	UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress. MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	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. **AND** **ANY** of the following transient events in progress. • Automatic or manual runback greater than 25% thermal reactor power • Electrical load rejection greater than 25% full electrical load • Reactor scram [*BWR*] / trip [*PWR*] • ECCS (SI) actuation • Thermal power oscillations greater than 10% [*BWR*]	SA3.1	An UNPLANNED event results in the inability to monitor **one or more** Table S-2 parameters from within the Control Room for ≥ 15 min. (Note 1) **AND** **Any** significant transient is in progress, Table S-3	The site-specific Safety System Parameters are listed in Table S-2. The site-specific significant transients are listed in Table S-3. MNS is a PWR and thus does not include thermal power oscillations > 10%.

Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

[BWR parameter list]	*[PWR parameter list]*
Reactor Power	Reactor Power
RPV Water 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

Table S-2 Safety System Parameters

- Reactor power
- NCS level
- NCS pressure
- Core exit T/C temperature
- Level in at least one S/G
- Auxiliary or emergency feed flow

Table S-3 Significant Transients

- Reactor trip
- Runback > 25% thermal power
- Electrical load rejection > 25% electrical load
- Safety injection actuation

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SA5	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. MODE: Power Operation	SA6	Automatic or manual trip fails to shut down the reactor and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor MODE: 1 - Power Operation	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. An automatic or manual (trip [PWR] / scram [BWR]) did not shutdown the reactor. **AND** b. Manual actions taken at the reactor control consoles are not successful in shutting down the reactor.	SA6.1	An automatic or manual trip fails to shut down the reactor as indicated by reactor power ≥ 5% **AND** Manual trip actions taken at the reactor control console (manual reactor trip switches or turbine manual trip) are not successful in shutting down the reactor as indicated by reactor power ≥ 5% (Note 8)	As specified in the generic developers guidance "Developers may include site-specific EOP criteria indicative of a successful reactor shutdown in an EAL statement, the Basis or both (e.g., a reactor power level)." Reactor power < 5% is the site-specific indication of a successful reactor trip. The manual reactor trip switches and turbine manual trip are the site-specific reactor control console trip switches credited for a successful manual trip.
Notes	**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	N/A	Note 8: 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	None

	strategies.		in control rods or implementation of boron injection strategies.	

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SA9	Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SA9	Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. The occurrence of **ANY** of the following hazardous events: • Seismic event (earthquake) • Internal or external flooding event • High winds or tornado strike • FIRE • EXPLOSION • (site-specific hazards) • Other events with similar hazard characteristics as determined by the Shift Manager **AND** b. **EITHER** of the following: 1. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode. **OR** 2. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode.	SA9.1	The occurrence of **any** Table S-5 hazardous event **AND EITHER:** • Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode • The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode	The hazardous events have been listed in Table S-5.

Table S-5 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

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SS1	Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SS1	Loss of **all** offsite and **all** onsite AC power to essential buses for 15 minutes or longer MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	The MNS essential buses are the site-specific emergency buses.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Loss of **ALL** offsite and **ALL** onsite AC power to (site-specific emergency buses) for 15 minutes or longer.	SS1.1	Loss of all offsite and all onsite AC power capability, Table S-1, to essential 4160V buses 1(2)ETA and 1(2)ETB for ≥ 15 min. (Note 1)	4160V buses 1(2)ETA and 1(2)ETB are the site-specific emergency buses. Site-specific AC power sources are listed in Table S-1.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SS5	Inability to shutdown the reactor causing a challenge to (core cooling [*PWR*] / RPV water level [*BWR*]) or RCS heat removal. MODE: Power Operation	SS6	Inability to shut down the reactor causing a challenge to core cooling or NCS heat removal MODE: 1 - Power Operation	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. An automatic or manual (trip [PWR] / scram [BWR]) did not shutdown the reactor. **AND** b. All manual actions to shutdown the reactor have been unsuccessful. **AND** c. **EITHER** of the following conditions exist: • (Site-specific indication of an inability to adequately remove heat from the core) • (Site-specific indication of an inability to adequately remove heat from the RCS)	SS6.1	An automatic or manual trip fails to shut down the reactor as indicated by reactor power ≥ 5% **AND** **All** actions to shut down the reactor are **not** successful as indicated by reactor power ≥ 5% **AND EITHER:** • Core Cooling RED Path conditions met • Heat Sink RED Path conditions met	As specified in the generic developers guidance "Developers may include site-specific EOP criteria indicative of a successful reactor shutdown in an EAL statement, the Basis or both (e.g., a reactor power level)." Reactor power < 5% is the site-specific indication of a successful reactor trip. Indication that core cooling is extremely challenged is manifested by CSFST Core Cooling RED Path conditions met. Indication that heat removal is extremely challenged is manifested by CSFST Heat Sink RED Path conditions met.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SS8	Loss of all Vital DC power for 15 minutes or longer. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SS2	Loss of **all** vital DC power for 15 minutes or longer. MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	None

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	Indicated voltage is less than (site-specific bus voltage value) on **ALL** (site-specific Vital DC busses) for 15 minutes or longer.	SS2.1	Loss of all 125 VDC power based on battery bus voltage indications < 105 VDC on both vital DC buses EVDA and EVDD for ≥ 15 min (Note 1)	105 VDC is the site-specific minimum vital DC bus voltage. DC buses EVDA and EVDD are the site-specific vital DC buses.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SG1	Prolonged loss of all offsite and all onsite AC power to emergency buses. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SG1a	Prolonged loss of **all** offsite and **all** onsite AC power to essential buses MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	NEI ICs SG1 and SG8 are grouped under the same MNS IC for simplification. The MNS essential buses are the site-specific emergency buses.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. Loss of **ALL** offsite and **ALL** onsite AC power to (site-specific emergency buses). **AND** b. **EITHER** of the following: • Restoration of at least one AC emergency bus in less than (site-specific hours) is not likely. • (Site-specific indication of an inability to adequately remove heat from the core)	SG1.1	Loss of **all** offsite and **all** onsite AC power capability to essential 4160V buses 1(2)ETA and 1(2)ETB **AND EITHER:** • Restoration of at least one emergency bus in < 4 hours is **not** likely (Note 1) • Core Cooling RED Path conditions met	4160V buses 1(2)ETA and 1(2)ETB are the site-specific emergency buses. 4 hours is the site-specific SBO coping analysis time. CSFST Core Cooling RED Path conditions met indicates significant core exit superheating and core uncovery.
Note	The Emergency Director should declare the General Emergency promptly upon determining that (site-specific hours) has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.

NEI IC#	NEI IC Wording	MNS IC#(s)	MNS IC Wording	Difference Justification
SG8	Loss of all AC and Vital DC power sources for 15 minutes or longer. MODE: Power Operation, Startup, Hot Standby, Hot Shutdown	SG1b	Loss of **all** AC and vital DC power sources for 15 minutes or longer MODE: 1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown	NEI ICs SG1 and SG8 are grouped under the same MNS IC for simplification.

NEI Ex. EAL #	NEI Example EAL Wording	MNS EAL #	MNS EAL Wording	Difference Justification
1	a. Loss of **ALL** offsite and **ALL** onsite AC power to (site-specific emergency buses) for 15 minutes or longer. **AND** b. Indicated voltage is less than (site-specific bus voltage value) on ALL (site-specific Vital DC busses) for 15 minutes or longer.	SG1.2	Loss of **all** offsite and **all** onsite AC power capability, Table S-1, to emergency 4160V buses 1(2)ETA and 1(2)ETB for ≥ 15 min. **AND** Loss of all 125 VDC power based on battery bus voltage indications < 105 VDC on both vital DC buses EVDA and EVDD for ≥ 15 min. (Note 1)	4160V buses 1(2)ETA and 1(2)ETB are the site-specific emergency buses. Site-specific AC power sources are tabularized in Table S-1. 105 VDC is the site-specific minimum vital DC bus voltage. EVDA and EVDD are the site-specific vital DC buses.
Note	The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.	N/A	Note 1: The Emergency Coordinator/EOF Director should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.	The classification timeliness note has been standardized across the MNS EAL scheme by referencing the "time limit" specified within the EAL wording.