CA3: INITIATING CONDITIONS

NEI 99-01 Rev 6	Hatch
Inability to maintain the plant in cold shutdown.	Inability to maintain the plant in cold shutdown.
Difference / Deviation / Justification	
None	

THRESHOLDS

NEI 99-01 Rev 6

(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.

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.

(2) UNPLANNED RCS pressure increase greater than (site-specific pressure reading). (This EAL does not apply during water-solid plant conditions. [*PWR*])

Hatch

(1) UNPLANNED increase in RCS temperature to greater than 212 °F for greater than the duration specified in Table C2.

Table C2: RCS Heat-up Duration Thresholds

RCS Status	Secondary CONTAINMENT INTEGRITY Status	Heat-up Duration
Not intact	Not Established	0 minutes*
	Established	20 minutes
Intact	Not applicable	60 minutes *

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

(2) UNPLANNED RCS pressure increase greater than 10 psig.

Difference / Deviation / Justification

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

Difference:	**Table designator C2 assigned to RCS Heat-up Duration Thresholds Table.**
Justification:	**Editorial change to clearly identify tables within the document.**
Difference:	**Information included in RCS Heat-up Duration Thresholds Table for Hatch is inverted from the presentation in NEI 99-01 Rev 6. Information is the same.**
Justification:	**Editorial change for Human Factors considerations – worst case is presented first.**
Difference:	**NEI 99-01 Rev 6 RCS Heat-up Duration Threaholds Table refers to RCS heat removal system. Hatch table uses RHR.**
Justification:	**Site termoniology difference from NEI 99-01 Rev 6; RHR is equivalent to RCS heat removal system.**
Difference:	**Site specific information provided. See Attachment V1 TS Table 1.1-1 Modes and V14 RCS Pressure Indications.**

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

CA6: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode.	Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode.
Difference / Deviation / Justification	
None	

THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(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 ● Other events with similar hazard characteristics as determined by the Shift Manager **AND** b. **EITHER** of the following: • 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.
Difference / Deviation / Justification	

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

Difference:	**NEI 99-01 Rev 6 EALThreshold (1)a, next to the last bullet, refers to site-specific hazards. No additional site specific hazards are identified for Hatch.**
Justification:	**Hatch has not identified any additional site-specific hazards applicable to this EAL.**
Difference:	**NEI 99-01 Rev 6 EAL Threshold (1)b uses numbers and a conditional OR. Hatch uses bullets to separate the two conditions.**
Justification:	**Editorial change – doesnot impact the ability to classify the event.**

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

CU1: INITIATING CONDITIONS

NEI 99-01 Rev 6	Hatch
UNPLANNED loss of (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) inventory for 15 minutes or longer.	UNPLANNED loss of RPV inventory for 15 minutes or longer.

Difference / Deviation / Justification

None

THRESHOLDS

NEI 99-01 Rev 6	Hatch
(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. (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.	(1) UNPLANNED loss of reactor coolant results in RPV level less than the lower limit of the controlling level band for 15 minutes or longer. (2) a. RPV level cannot be monitored. **AND** b. UNPLANNED level increase in any of the following:

Dryweel Floor Drain Sumps	Reactor Building Floor Drain Sumps
Drywell Equipment Drain Sumps	Turbine Building Floor Drain Sumps
Torus	Rad Waste Tanks
Torus Room Sumps	

Difference / Deviation / Justification

Difference: **Site specific information provided for EAL Threshold (1).**

Difference: **NEI 99-01 Rev 6 EAL Threshold (2)b uses levels as a clarifier after the listed site specific components. Hatch EAL Threshold (2)b places level before increase and includes the applicable components in table format. See V9 Component System Reference.**

Justification: **Human factors consideration – a level increase in any of the identified components continues to satisfy the EAL threshold. Listing the applicable components in table format facilitates identification (rather than being included in a list).**

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

<table>
<tr><th colspan="2">CU2: INITIATING CONDITIONS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Hatch</td></tr>
<tr><td>Loss of all but one AC power source to emergency buses for 15 minutes or longer.</td><td>Loss of all but one AC power source to essential buses for 15 minutes or longer.</td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">Difference: Site specific information provided for IC.
Justification: Terminology difference - Hatch refers to emergency buses as essential buses.</td></tr>
<tr><th colspan="2">THRESHOLDS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Hatch</td></tr>
<tr><td>(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.</td><td>(1) a. AC power capability to 4160 VAC Essential Buses 1/2E, 1/2F, and 1/2G 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.
<table><tr><th colspan="2">Table S1</th></tr><tr><th>Unit 1</th><th>Unit 2</th></tr><tr><td>Start-up Aux XFMR 1C</td><td>Start-up Aux XFMR 2C</td></tr><tr><td>Start-up Aux XFMR 1D</td><td>Start-up Aux XFMR 2D</td></tr><tr><td>Diesel Generator 1A</td><td>Diesel Generator 2A</td></tr><tr><td>Diesel Generator 1B</td><td>Diesel Generator 1B</td></tr><tr><td>Diesel Generator 1C</td><td>Diesel Generator 2C</td></tr></table></td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">Difference: Site specific information provided. See Attachment V13 4160 VAC Essential Buses Information.</td></tr>
</table>

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

CU3: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
UNPLANNED increase in RCS temperature.	UNPLANNED increase in RCS temperature.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit). (2) Loss of **ALL** RCS temperature and (reactor vessel/RCS [*PWR*] or RPV [*BWR*]) level indication for 15 minutes or longer.	(1) UNPLANNED increase in RCS temperature to greater than 212 °F. (2) Loss of **ALL** RCS temperature and RPV level indication for 15 minutes or longer.
Difference / Deviation / Justification	
Difference: Site specific information provided. See Attachment V1 TS Table 1.1-1 Modes.	

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

CU4: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Loss of Vital DC power for 15 minutes or longer.	Loss of Vital DC power for 15 minutes or longer.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) Indicated voltage is less than (site-specific bus voltage value) on required Vital DC buses for 15 minutes or longer.	(1) Indicated voltage is less than 105/210VDC on Technical Specification required 125/250 VDC buses 1/2R22-S016 **OR** 1/2R22-S017 for 15 minutes or longer.
Difference / Deviation / Justification	
Difference: **NEI 99-01 Rev 6 EAL Threshold (1) refers to Vital DC buses. Hatch EAL Threshold (1) identifies the specific DC buses applicable to this EAL.** **Justification:** **Editorial change – Human Factors consideration that does not affect EAL.** **Difference:** **Site specific information provided. See Attachment V15 DC System Information.**	

COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION ICS/EALS

CU5: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Loss of all onsite or offsite communications capabilities.	Loss of all onsite or offsite communications capabilities.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) Loss of **ALL** of the following onsite communication methods: (site-specific list of 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)	(1) Loss of **ALL** of the following onsite communication methods: Plant telephones (Includes hardwired and wireless) Plant page Plant radio systems (2) Loss of **ALL** of the following ORO communications methods: ENN (Emergency Notification Network) Commercial phones (3) Loss of **ALL** of the following NRC communications methods: ENS on Federal Telecommunications System (FTS) Commercial phones
Difference / Deviation / Justification	
Difference: **Site specific information provided.**	

E-HU1: INITIATING CONDITIONS

NEI 99-01 Rev 6	Hatch
Damage to a loaded cask CONFINEMENT BOUNDARY.	Damage to a loaded cask CONFINEMENT BOUNDARY.
Difference / Deviation / Justification	
None	

THRESHOLDS

NEI 99-01 Rev 6	Hatch
(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.	(1) Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading greater than ANY value listed in Table E1.
Difference / Deviation / Justification	

Table E1

Location of Dose Rate	Total Dose Rate (Neutron + Gamma mR/hr)
HI-TRAC 125	
Side – Mid- height	450
Top	110
HI-STAR 100 or HI-STORM 100	
Side – 60 inches below mid- height	80
Side – Mid- height	80
Side – 60 inches above mid- height	30
Center of lid	10
Middle of top lid	20
Top (outlet) duct	40
Bottom (inlet) duct	140

INDEPENDENT SPENT FUEL STORAGE FACILITY (ISFSI) ICS/EALS

Difference:	**Added new Table E2 to Hatch EAL Threshold (1). Site specific information provided. See Attachment V16 ISFSI TS/Dose Reading Calculation.**
Justification:	**Utilized table to display ISFSI technical specification radiation levels for the different ISFSI modules. Intent of NEI 99-01 Rev 6 EAL threshold remains satisfied.**

FISSION PRODUCT BARRIER ICS/EALS

BWR FISSION PRODUCT BARRIER MATRIX - INITIATING CONDITIONS/THRESHOLDS					
NEI 99-01 Rev 6					
FA1 – Any loss or any Potential Loss of either the Fuel Clad or RCS barrier.		**FS1** - Loss or Potential Loss of any two barriers.		**FG1** - Loss of any two barriers and Loss or Potential Loss of the third barrier.	
Hatch					
FG1 – Loss of any two barriers and Loss or Potential Loss of the third barrier.		**FS1** - Loss or Potential Loss of any two barriers.		**FA1** - Any loss or any Potential Loss of either the Fuel Clad or RCS barrier.	
Difference / Deviation / Justification					
None					
Fuel Clad Barrier		**RCS Barrier**		**Containment Barrier**	
Loss	**Potential Loss**	**Loss**	**Potential Loss**	**Loss**	**Potential Loss**
NEI 99-01 Rev 6					
1. RCS Activity		**1. Primary Containment Pressure**		**1. Primary Containment Conditions**	
A. (Site-specific indications that reactor coolant activity is greater than 300 µCi/gm dose equivalent I-131).	Not Applicable	A. Primary containment pressure greater than (site-specific value) due to RCS leakage.	Not Applicable	A. UNPLANNED rapid drop in primary containment pressure following primary containment pressure rise **OR** B. Primary containment pressure response not consistent with LOCA conditions.	A. Primary containment pressure greater than (site-specific value) **OR** B. (site-specific explosive mixture) exists inside primary containment **OR** C. HCTL exceeded.

FISSION PRODUCT BARRIER ICS/EALS

Hatch					
A. Activity of 300 µCi/gm DEI_{131}	Not Applicable	A. Primary containment pressure greater than 1.85 psig due to RCS leakage.	Not Applicable	A. UNPLANNED rapid drop in primary containment pressure following primary containment pressure rise **OR** B. Primary containment pressure response not consistent with LOCA conditions.	A. Primary containment pressure greater than 56 psig **OR** B. Greater than or equal to 6% H_2 **AND** 5% O_2 exists inside primary containment **OR** C. HCTL exceeded.
Difference / Deviation / Justification					
Difference: **Site specific information provided. See V10 H_2 and O_2 Concentration Calculation/Reference, V11 Primary Containment Pressure Reference (> 56 psig), and V17 Primary Containment Pressure Reference (1.85 psig).**					
NEI 99-01 Rev 6					
2. RPV Water Level		**2. RPV Water Level**		**2. RPV Water Level**	
A. Primary containment flooding required.	A. RPV water level cannot be restored and maintained above (site-specific RPV water level corresponding to the top of active fuel) or cannot be determined.	A. RPV water level cannot be restored and maintained above (site-specific RPV water level corresponding to the top of active fuel) or cannot be determined.	Not Applicable	Not Applicable	A. Primary containment flooding required.
Hatch					

A. SAG entry is required.	A. RPV water level cannot be restored and maintained above -155 inches or cannot be determined.	A. RPV water level cannot be restored and maintained above -155 inches or cannot be determined.	Not Applicable	Not Applicable	A. SAG entry is required.
Difference / Deviation / Justification					
Difference: **Fuel Clad Barrier Loss EAL Threshold 2.A – added "SAG entry is required".** **Justification:** **Revised EAL threshold based on EP FAQ 2015-004 guidance.** **Difference:** **Containment Barrier Potential Loss EAL Threshold 2.A – added "SAG entry is required".** **Justification:** **Revised EAL threshold based on EP FAQ 2015-004 guidance.** **Difference:** **Site specific information provided for Fuel Clad Barrier Potential Loss EAL Threshold 2.A and RCS Barrier Loss EAL Threshold 2.A. See Attachment V7 RPV Level Indication/Display.**					
NEI 99-01 Rev 6					
3. Not Applicable		**3. RCS Leak Rate**		**3. Primary Containment Isolation Failure**	
Not Applicable	Not Applicable	A. UNISOLABLE break in **ANY** of the following: (site-specific systems with potential for high-energy line breaks) **OR** B. Emergency RPV Depressurization.	A. UNISOLABLE primary system leakage that results in exceeding **EITHER** of the following: 1. Max Normal Operating Temperature **OR** 2. Max Normal Operating Area Radiation Level.	A. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal **OR** B. Intentional primary containment venting per EOPs **OR** C. UNISOLABLE primary system leakage that results in exceeding **EITHER** of the following:	Not Applicable

				1. Max Safe Operating Temperature. **OR** 2. Max Safe Operating Area Radiation Level.	
Hatch					
Not Applicable	Not Applicable	A. UNISOLABLE break in Main Steamline, HPCI, Feedwater, RWCU, or RCIC **OR** B. Emergency RPV Depressurization.	A. UNISOLABLE primary system leakage that results in exceeding **EITHER** of the following: 1. Max Normal Operating Temperature **OR** 2. Max Normal Operating Area Radiation Level.	A. UNISOLABLE direct downstream pathway to the environment exists after primary containment isolation signal **OR** B. Intentional primary containment venting per EOPs **OR** C. UNISOLABLE primary system leakage that results in exceeding **EITHER** of the following: 1. Max Safe Operating Temperature. **OR** 2. Max Safe Operating Area Radiation Level.	Not Applicable
Difference / Deviation / Justification					

Difference: **Site specific listing of systems provided. See V12 Secondary Containment Rad Monitors and V18 Secondary Containment Temperature for Max Safe/Normal Rad and Operating Temperature values.**					
NEI 99-01 Rev 6					
4. Primary Containment Radiation		**4. Primary Containment Radiation**		**4. Primary Containment Radiation**	
A. Primary containment radiation monitor reading greater than (site-specific value).	Not Applicable	A. Primary containment radiation monitor reading greater than (site-specific value).	Not Applicable	Not Applicable	A. Primary containment radiation monitor reading greater than (site-specific value).
Hatch					
A. DWRRM greater than 1.400 R/hr.	Not Applicable	A. DWRRM greater than 40 R/hr.	Not Applicable	Not Applicable	A. DWRRM greater than 26,000 R/hr.
Difference / Deviation / Justification					
Difference: **EAL Threshold 4.A for Loss of Fuel Clad and RCS Barriers and Potential Loss of Containment Barrier does not include the following wording – "Primary containment radiation monitor reading…".** **Justification:** **Human factors consideration - DWRRM is the site designator for the Primary Containment radiation monitor.** **Difference:** **Site specific informsation provided. See Attachment V2 Rad Monitor Calculation.**					
NEI 99-01 Rev 6					
5. Other Indications		**5. Other Indications**		**5. Other Indications**	
A. (site-specific as applicable)	A. (site-specific as applicable)	A. (site-specific as applicable)	A. (site-specific as applicable)	A. (site-specific as applicable)	A. (site-specific as applicable)
Hatch					
A. Offgas Pre-and Post-Treatment Monitors Offscale High.	Not Applicable	A. Drywell Fission Product Monitor reading 5.0×10^5 cpm.	Not Applicable	Not Applicable	Not Applicable

FISSION PRODUCT BARRIER ICS/EALS

Difference / Deviation / Justification					
Difference: **Site specific information provided. See Attachment V2 Rad Monitor Calculation.**					
NEI 99-01 Rev 6					
6. Emergency Director Judgment		**6. Emergency Director Judgment**		**6. Emergency Director Judgment**	
A. **ANY** condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	A. **ANY** condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.	A. **ANY** condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.	A. **ANY** condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.	A. **ANY** condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.	A. **ANY** condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.
Hatch					
A. **ANY** condition in the opinion of the emergency director that indicates loss of the fuel clad barrier.	A. **ANY** condition in the opinion of the emergency director that indicates potential loss of the fuel clad barrier.	A. **ANY** condition in the opinion of the emergency director that indicates loss of the RCS Barrier.	A. **ANY** condition in the opinion of the emergency director that indicates potential loss of the RCS Barrier.	A. **ANY** condition in the opinion of the emergency director that indicates loss of the Containment Barrier.	A. **ANY** condition in the opinion of the emergency director that indicates potential loss of the Containment Barrier.
Difference / Deviation / Justification					
None					

HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY ICS/EALS

HG1: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
HOSTILE ACTION resulting in loss of physical control of the facility.	HOSTILE ACTION resulting in loss of physical control of the facility.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(1) a. A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA (PA) as reported by the Security Shift Captain or designee. **AND** b. **EITHER** of the following has occurred: 1. **ANY** of the following safety functions cannot be controlled or maintained. • Reactivity control • RPV water level • RCS heat removal **OR** 2. Damage to spent fuel has occurred or is IMMINENT.
Difference / Deviation / Justification	
Difference: **Site specific information provided.**	

HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY ICS/EALS

HG7: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency.	Other conditions exist which in the judgment of the emergency director warrant declaration of a General Emergency.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(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.
Difference / Deviation / Justification	
None	

HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY ICS/EALS

HS1: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
HOSTILE ACTION within the PROTECTED AREA.	HOSTILE ACTION within the PROTECTED AREA.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-specific security shift supervision).	(1) A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA (PA) as reported by the Security Shift Captain or designee.
Difference / Deviation / Justification	
Difference: Site specific information provided.	

HS6: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Inability to control a key safety function from outside the Control Room.	Inability to control a key safety function from outside the Control Room.
Difference / Deviation / Justification	
None	

THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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	(1) a. An event has resulted in plant control being transferred from the control room to remote shutdown panels. **AND** b. Control of **ANY** of the following key safety functions is not reestablished within 15 minutes. • Reactivity control • RPV water level • RCS heat removal
Difference / Deviation / Justification	
Difference: **Site specific information provided.**	

HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY ICS/EALS

HS7: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency.	Other conditions exist which in the judgment of the emergency director warrant declaration of a Site Area Emergency.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(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.
Difference / Deviation / Justification	
None	

HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY ICS/EALS

HA1: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.	HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the (site-specific security shift supervision). (2) A validated notification from NRC of an aircraft attack threat within 30 minutes of the site.	(1) A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA (OCA) as reported by the Security Shift Captain or designee. (2) A validated notification from NRC of an aircraft attack threat within 30 minutes of the site.
Difference / Deviation / Justification	
Difference: Site specific information provided.	

HA5: INITIATING CONDITIONS

NEI 99-01 Rev 6	Hatch
Gaseous release impeding access to equipment necessary for normal plant operations, cool down or shutdown.	Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.
Difference / Deviation / Justification	
None	

THRESHOLDS

NEI 99-01 Rev 6

(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.

Hatch

(1) a. Release of a toxic, corrosive, asphyxiant or flammable gas into any Table H1 plant rooms or areas:

Table H1

Building	Rooms	Applicable Modes
Diesel generator building	All	All
Reactor building	Unit 1/2 130'	All
	Unit 1/2 SE Diagonals (RHR)	All
	Unit 1/2 NE Diagonals (RHR)	All

AND

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

Difference / Deviation / Justification

Difference: Site specific information provided. Hatch EAL Threshold (1)a incorporates Table H1 to identify applicable site specific rooms/areas.

HA6: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Control Room evacuation resulting in transfer of plant control to alternate locations.	Control Room evacuation resulting in transfer of plant control to alternate locations.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) An event has resulted in plant control being transferred from the Control Room to (site-specific remote shutdown panels and local control stations).	(1) An event has resulted in plant control being transferred from the control room to remote shutdown panels.
Difference / Deviation / Justification	
Difference: Site specific information provided.	

HA7: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert.	Other conditions exist which in the judgment of the emergency director warrant declaration of an Alert.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(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.
Difference / Deviation / Justification	
None	

HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY ICS/EALS

HU1: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Confirmed SECURITY CONDITION or threat.	Confirmed SECURITY CONDITION or threat.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the (site-specific security shift supervision). (2) Notification of a credible security threat directed at the site. (3) A validated notification from the NRC providing information of an aircraft threat.	(1) A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the Security Shift Captain or designee. (2) Notification of a credible security threat directed at HNP. (3) A validated notification from the NRC providing information of an aircraft threat.
Difference / Deviation / Justification	
Difference: EAL Threshold (2); replaced 'the site' with HNP. **Justification: Editorial change – clearly identifies that threat is directed against the Hatch site.** **Difference: Site specific information provided.**	

HU2: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Seismic event greater than OBE levels.	Seismic event greater than OBE levels.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) Seismic event greater than Operating Basis Earthquake (OBE) as indicated by: (site-specific indication that a seismic event met or exceeded OBE limits)	(1) Seismic event greater than Operating Basis Earthquake (OBE) as indicated by **ANY** of the following: • Unit One "Seismic Peak Shock Recorder High G Level" (657-066) alarm • Unit Two "Seismic Instrumentation Triggered" (657-048) alarm • A 12.7 Hz amber light illuminated in the N/S OR E/W column on panel 1H11-P701 • A 12.7 Hz red light illuminated in the N/S OR E/W column on panel 1H11-P701
Difference / Deviation / Justification	
Difference: **Site specific information provided. See V19 Seismic Indications.**	

HU3: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Hazardous event.	Hazardous event.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) A tornado strike within the PROTECTED AREA. (2) Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component needed for the current operating mode. (3) Movement of personnel within the PROTECTED AREA is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release). (4) A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles. (5) (Site-specific list of natural or technological hazard events)	(1) A tornado strike within the PROTECTED AREA (PA). (2) Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component needed for the current operating mode. (3) Movement of personnel within the PROTECTED AREA (PA) is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release). (4) A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site in personal vehicles. (5) Sustained hurricane force winds greater than 74 mph forecast to be at the plant site in the next four hours.
Difference / Deviation / Justification	
Difference: EAL Threshold (4) - replaced "via" with "in". **Justification: Editorial change.** **Difference: Site specific information provided for EAL Threshold (5).**	

HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY ICS/EALS

HU4: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
FIRE potentially degrading the level of safety of the plant.	FIRE potentially degrading the level of safety of the plant.
Difference / Deviation / Justification	
None	

THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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) (2) a. Receipt of a single fire alarm (i.e., no other indications of a FIRE). **AND** b. The FIRE is located within **ANY** of the following plant rooms or areas: (site-specific list of plant rooms or areas) **AND** c. The existence of a FIRE is not verified within 30-minutes of alarm receipt. (3) A FIRE within the plant *or ISFSI* [*for plants with an ISFSI outside the plant Protected Area*] PROTECTED AREA not extinguished within 60-minutes of the initial report, alarm or indication.	(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** Table H2 rooms or areas. (2) a. Receipt of a single fire alarm (i.e., no other indications of a FIRE). **AND** b. The FIRE is located within **ANY** Table H2 rooms or areas. **AND** c. The existence of a FIRE is not verified within 30-minutes of alarm receipt. (3) A FIRE within the plant PROTECTED AREA (PA) or ISFSI PROTECTED AREA not extinguished within 60-minutes of the initial report, alarm or indication. (4) A FIRE within the plant PROTECTED AREA (PA) or ISFSI PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish.

(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.

Table H2

Building	Rooms
Control Building	CB 147' Cable Spreading Room
	U1/2 CB 112' Station Battery Rooms A,B
Diesel generator building	All
Primary Containment	All
Reactor building	Unit 1/2 130'
	Unit 1/2 SE Diagonals (RHR)
	Unit 1/2 NE Diagonals (RHR)
	Unit 1 SW Diagonals (RCIC)
	Unit 2 NW Diagonals (RCIC)
	Unit 1/2 HPCI Rooms
Intake structure	All

Difference / Deviation / Justification

Differences: **EAL Thresholds (1)b and (2)b – added reference to Table H2 instead of listing areas separately for each EAL.**
Justification: **Human factors consideration – applicable rooms are the same for each EAL. Placing these rooms into one table and referencing that table in the EAL simplifies the process for identifying applicable rooms.**

Differences: **EAL Thresholds (3) and (4) – added PROTECTED AREA (PA) after plant.**
Justification: **Clarifies plant areas that are applicable to these EALs.**

Differences: **Site specific information provided - added Table H2 with applicable room listing. See V20 Table H2 Basis.**
Justification: **Human factors consideration.**

HU7: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Other conditions exist which in the judgment of the Emergency Director warrant declaration of a (NO)UE.	Other conditions exist which in the judgment of the emergency director warrant declaration of a Notification of Unusual Event (NOUE).
Difference / Deviation / Justification	
Difference: Editorial change that does not change IC.	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(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.
Difference / Deviation / Justification	
None	

SG1: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Prolonged loss of all offsite and all onsite AC power to emergency buses.	Prolonged loss of all offsite and all onsite AC power to essential buses.
Difference / Deviation / Justification	
Difference: **Site specific information provided for IC.** **Justification:** **Terminology difference - Hatch refers to emergency buses as essential buses.**	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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)	(1) a. Loss of **ALL** offsite and **ALL** onsite AC power to 4160 VAC Essential Buses 1/2E, 1/2F, and 1/2G. **AND** b. **EITHER** of the following: • Restoration of at least one AC essential bus in less than 4 hours is not likely. • Reactor vessel water level cannot be restored and maintained above Minimum Steam Cooling RPV Water Level.
Difference / Deviation / Justification	
Difference: **Site specific information provided. See V13 4160 VAC Essential Buses Information and V21 Minimum Steam Cooling RPV Water Level.**	

SG8: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Loss of all AC and Vital DC power sources for 15 minutes or longer.	Loss of all AC and vital DC power sources for 15 minutes or longer.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(1) a. Loss of **ALL** offsite and **ALL** onsite AC power to 4160 VAC Essential Buses 1/2E, 1/2F, and 1/2G for 15 minutes or longer. **AND** b. Indicated voltage is less than 105/210 VDC on **ALL** 125/250 VDC Bus 1/2R22-S016 and 1/2R22-S017 for 15 minutes or longer.
Difference / Deviation / Justification	
Difference: Site specific information provided. See V13 4160 VAC Essential Buses Information, V15 DC System Information.	

SS1: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.	Loss of all offsite and all onsite AC power to essential buses for 15 minutes or longer.
Difference / Deviation / Justification	
Difference: Site specific information provided for IC. **Justification: Terminology difference - Hatch refers to emergency buses as essential buses.**	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) Loss of **ALL** offsite and **ALL** onsite AC power to (site-specific emergency buses) for 15 minutes or longer.	(1) Loss of ALL offsite and ALL onsite AC power to 4160 VAC Essential Buses 1/2E, 1/2F, and 1/2G for 15 minutes or longer.
Difference / Deviation / Justification	
Difference: Site specific information provided. See V13 4160 VAC Essential Buses Information.	

SS5: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Inability to shut down the reactor causing a challenge to (core cooling [*PWR*] / RPV water level [*BWR*]) or RCS heat removal.	Inability to shutdown the reactor causing a challenge to RPV water level or RCS heat removal.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) a. An automatic or manual (trip [PWR] / scram [BWR]) did not shutdown the reactor. **AND** b. All manual actions to shut down 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)	(1) a. An automatic or manual scram 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: • Reactor vessel water level cannot be restored and maintained above Minimum Steam Cooling RPV Water Level • Exceeding the Heat Capacity Temperature Limit (HCTL) Curve (EOP Graph 2)
Difference / Deviation / Justification	
Difference: **Site specific information provided. See V21 Minimum Steam Cooling RPV Water Level and V22 Heat Capacity Temperature Limit (HCTL) Curve.**	

SS8: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Loss of all Vital DC power for 15 minutes or longer.	Loss of all vital DC power for 15 minutes or longer.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) Indicated voltage is less than (site-specific bus voltage value) on **ALL** (site-specific Vital DC busses) for 15 minutes or longer.	(1) Indicated voltage is less than 105/210 VDC on **ALL** 125/250 VDC Bus 1/2R22-S016 and 1/2R22-S017 for 15 minutes or longer.
Difference / Deviation / Justification	
Difference: **Site specific information provided. See V15 DC System Information.**	

SA1: INITIATING CONDITIONS

NEI 99-01 Rev 6	Hatch
Loss of all but one AC power source to emergency buses for 15 minutes or longer.	Loss of all but one AC power source to essential buses for 15 minutes or longer.

Difference / Deviation / Justification

Difference: **Site specific information provided for IC.**
Justification: Terminology difference - Hatch refers to emergency buses as essential buses.

THRESHOLDS

NEI 99-01 Rev 6	Hatch
(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.	(1) a. AC power capability to 4160 VAC Essential Buses 1/2E, 1/2F, and 1/2G 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.

Table S1

Unit 1	Unit 2
Start-up Aux XFMR 1C	Start-up Aux XFMR 2C
Start-up Aux XFMR 1D	Start-up Aux XFMR 2D
Diesel Generator 1A	Diesel Generator 2A
Diesel Generator 1B	Diesel Generator 1B
Diesel Generator 1C	Diesel Generator 2C

Difference / Deviation / Justification

Difference: **Site specific information provided. See V13 4160 VAC Essential Buses Information.**

SYSTEM MALFUNCTIONS

SA2: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.	UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**

SYSTEM MALFUNCTIONS

(1) a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer.

[*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

AND

b. **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*]

(1) a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer.

Reactor Power
RPV Water Level
RPV Pressure
Primary Containment Pressure
Suppression Pool Level
Suppression Pool Temperature

AND

b. **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
- ECCS actuation
- Thermal power oscillations greater than 10%

Difference / Deviation / Justification

None

SA5: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Automatic or manual (trip [PWR] / scram [BWR]) fails to shut down the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.	Automatic or manual scram fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.
Difference / Deviation / Justification	
None	

THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(1) a. An automatic or manual scram did not shutdown the reactor. **AND** b. Manual actions taken at the reactor control consoles are not successful in shutting down the reactor.
Difference / Deviation / Justification	
None	

SA9: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode.	Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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.	(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 • Other events with similar hazard characteristics as determined by the Shift Manager **AND** b. **EITHER** of the following: • 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.
Difference / Deviation / Justification	

SYSTEM MALFUNCTIONS

Difference:	**NEI 99-01 Rev 6 EAL Threshold (1)a, next to the last bullet, refers to site-specific hazards. No additional site specific hazards are identified for Hatch.**
Justification:	**Hatch has not identified any additional site-specific hazards applicable to this threshold.**
Difference:	**NEI 99-01 Rev 6 EAL Threshold (1)b uses numbers and a conditional OR. Hatch uses bullets to separate the two conditions.**
Justification:	**Editorial change – doesnot impact the ability to classify the event.**

<table>
<tr><th colspan="2">SU1: INITIATING CONDITIONS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Hatch</td></tr>
<tr><td>Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.</td><td>Loss of all offsite AC power capability to essential buses for 15 minutes or longer.</td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">Difference: Site specific information provided for IC.
Justification: Terminology difference - Hatch refers to emergency buses as essential buses.</td></tr>
<tr><th colspan="2">THRESHOLDS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Hatch</td></tr>
<tr><td>(1) Loss of ALL offsite AC power capability to (site-specific emergency buses) for 15 minutes or longer.</td><td>(1) Loss of ALL offsite AC power capability to 4160 VAC Essential Buses 1/2E, 1/2F, and 1/2G for 15 minutes or longer.
<table>
<tr><th colspan="2">Table S2</th></tr>
<tr><th>Unit 1</th><th>Unit 2</th></tr>
<tr><td>Start-up Aux XFMR 1C</td><td>Start-up Aux XFMR 2C</td></tr>
<tr><td>Start-up Aux XFMR 1D</td><td>Start-up Aux XFMR 2D</td></tr>
</table></td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">Difference: Site specific information provided. See V13 4160 VAC Essential Buses Informaton.</td></tr>
</table>

SU2: INITIATING CONDITIONS

NEI 99-01 Rev 6	Hatch
UNPLANNED loss of Control Room indications for 15 minutes or longer.	UNPLANNED loss of Control Room indications for 15 minutes or longer.

Difference / Deviation / Justification

None

THRESHOLDS

NEI 99-01 Rev 6

(1) a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer.

[*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

Hatch

(1) a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer.

Reactor Power
RPV Water Level
RPV Pressure
Primary Containment Pressure
Suppression Pool Level
Suppression Pool Temperature

Difference / Deviation / Justification

None

SU3: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Reactor coolant activity greater than Technical Specification allowable limits.	Reactor coolant activity greater than Technical Specification allowable limits.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) (Site-specific radiation monitor) reading greater than (site-specific value). (2) Sample analysis indicates that a reactor coolant activity value is greater than an allowable limit specified in Technical Specifications.	**Note:** Use the Unit 1 or Unit 2 Pretreatment (Flow vs mR/hr) Graphs to determine if the Pretreatment Radiation Monitor exceeds the TV of 240,000 µCi/sec. (1) Pretreatment Radiation Monitor 1(2)D11K601 1(2)D11K602 reading greater than 240,000 µCi/sec for greater than 60 minutes. (2) Sample analysis indicates that the reactor coolant specific activity is **EITHER:** • Greater than 0.2 µCi/gm and less than or equal to 2.0 µCi/gm dose equivalent I_{131} for greater than 48 hours • Greater than 2.0 µCi/gm dose equivalent I_{131}.
Difference / Deviation / Justification	
Difference: NEI 99-01 Rev 6 EAL Threshold (1) does not include a Note box. Hatch EAL Threshold (1) includes a Note box. **Justification:** Editorial change to provide guidance on use of Unit 1 or Unit 2 Pretreatment Graphs to determine if threshold has been exceeded. **Difference:** Site specific information provided for Threshold (1). See V23 TS 3.7.6 Pretreatment Radiation Monitor Reading. **Difference:** NEI 99-01 Rev 6 EAL Threshold (2) does not specify a Technical Specification value. Hatch EAL Threshold (2) identifies the coolant activity values that satisfy the EAL threshold. See V24 TS 3.4.6 RCS Sample Activity. **Justification:** Editorial change to clearly indicate Technical Specification limits to plant personnel.	

SU4: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
RCS leakage for 15 minutes or longer.	RCS leakage for 15 minutes or longer.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) RCS unidentified or pressure boundary leakage greater than (site-specific value) for 15 minutes or longer. (2) RCS identified leakage greater than (site-specific value) for 15 minutes or longer. (3) Leakage from the RCS to a location outside containment greater than 25 gpm for 15 minutes or longer.	(1) RCS unidentified or pressure boundary leakage greater than 10 gpm for 15 minutes or longer. (2) RCS identified leakage greater than 25 gpm for 15 minutes or longer. (3) Leakage from the RCS to a location outside containment greater than 25 gpm for 15 minutes or longer.
Difference / Deviation / Justification	
Difference: Site specific value is not used for EAL Thresholds (1) and (2). See V25 TS 3.4.4 RCS Operational Leakage. **Justification: HNP Tech Spec leak rate is less than identified EAL threshold values. Per Developer Notes the identified values are used.**	

SYSTEM MALFUNCTIONS

SU5: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Automatic or manual (trip [PWR] / scram [BWR]) fails to shutdown the reactor.	Automatic or manual scram fails to shutdown the reactor.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(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. (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 down the reactor. **OR** 2. A subsequent automatic (trip [PWR] / scram [BWR]) is successful in shutting down the reactor.	(1) a. An automatic scram did not shutdown the reactor. **AND** b. A subsequent manual action taken at the reactor control consoles is successful in shutting down the reactor. (2) a. A manual scram did not shutdown the reactor. **AND** b. **EITHER** of the following: • A subsequent manual action taken at the reactor control consoles is successful in shutting down the reactor. • A subsequent automatic scram is successful in shutting down the reactor.
Difference / Deviation / Justification	
Difference: NEI 99-01 Rev 6 EAL Threshold (2)b uses numbers and a conditional OR. Hatch uses bullets to separate the two conditions. **Justification: Editorial change – doesnot impact the ability to classify the event.**	

SU6: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Hatch**
Loss of all onsite or offsite communications capabilities.	Loss of all onsite or offsite communications capabilities.
Difference / Deviation / Justification	
None	

THRESHOLDS	
NEI 99-01 Rev 6	**Hatch**
(1) Loss of **ALL** of the following onsite communication methods: (site-specific list of 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)	(1) Loss of **ALL** of the following onsite communication methods: Plant telephones (Includes hardwired and wireless) Plant page Plant radio systems (2) Loss of **ALL** of the following ORO communications methods: ENN (Emergency Notification Network) Commercial phones (3) Loss of **ALL** of the following NRC communications methods: ENS Federal Telecommunications System (FTS) Commercial phones
Difference / Deviation / Justification	
Difference: Site specific information provided.	

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 1 and 2

License Amendment Request for Changes to
Emergency Action Level Schemes to Adopt NEI 99-01 Rev. 6
and to Modify Radiation Monitors at Farley Nuclear Plant

Enclosure 2

Vogtle Deviations and Differences Matrix

NEI 99-01 Rev 6

Deviations and Differences

Vogtle Electric Generating Plant – Units 1 and 2

Table of Contents

GENERIC DIFFERENCES	
NEI 99-01 Rev 6	**Vogtle**
References BWRs	Deleted BWR references as appropriate
Uses A for the radiological effluent/radiation level ICs	Uses R for the radiological effluent/radiation level ICs
Emergency Classification ICs are presented in ascending order (NOUE – GE)	Emergency Classification ICs are presented in descending order (GE – NOUE)
GENERAL NOTES	
Instrument setpoint readings used as threshold values to determine emergency classifications have been verified by Vogtle personnel as being within the range of the instrument and clearly and consistently read within the scale of the instrument.	
Site specific information is highlighted in yellow.	
RPV used instead of common PWR terminology of RCS.	
ODCM is the controlling Radiation Effluent Document.	
WOG CSFSTs are used for EAL thresholds as allowed by NEI 99-01 Rev 6 Developer Notes.	
Appendix A – Deleted BWR Acronyms and Abbreviations. Added additional acronyms as needed.	
Appendix B – Incorporated Site Specific definitions as appropriate.	

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

<table>
<tr><th colspan="2">RG1: INITIATING CONDITIONS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Vogtle</td></tr>
<tr><td>Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE.</td><td>Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE.</td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">None</td></tr>
<tr><th colspan="2">THRESHOLDS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Vogtle</td></tr>
<tr><td>(1) Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer:
(site-specific monitor list and threshold values)
(2) Dose assessment using actual meteorology indicates doses greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE at or beyond (site-specific dose receptor point).
(3) Field survey results indicate EITHER of the following at or beyond (site-specific dose receptor point):
• Closed window dose rates greater than 1,000 mR/hr expected to continue for 60 minutes or longer.
• Analyses of field survey samples indicate thyroid CDE greater than 5,000 mrem for one hour of inhalation.</td><td>(1) Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer:
<table><tr><td>Plant Vent RE-12444E</td><td>50 µCi/cc</td></tr><tr><td>Turbine Building Vent (SJAE) RE-12839E</td><td>2.1 x 10^3 µCi/cc</td></tr></table>(2) Dose assessment using actual meteorology indicates doses greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE at or beyond the site boundary.
(3) Field survey results indicate EITHER of the following at or beyond the site boundary:
• Closed window dose rates greater than 1,000 mR/hr expected to continue for 60 minutes or longer.
• Analyses of field survey samples indicate thyroid CDE greater than 5,000 mrem for one hour of inhalation.</td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">Difference: Site specific information provided. See V2 Rad Monitor Calculations and V3 ODCM Site Boundary Reference.</td></tr>
</table>

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

RG2: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Vogtle**
Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.	Spent fuel pool level cannot be restored to at least 194 foot level (Level 3) for 60 minutes or longer.
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Vogtle**
(1) Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for 60 minutes or longer.	(1) Spent fuel pool level cannot be restored to at least 194 foot level (Level 3) for 60 minutes or longer.
Difference / Deviation / Justification	
Difference: Site specific information provided. See V4 SFP Level 3&2 Indications.	

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

RS1: INITIATING CONDITIONS

NEI 99-01 Rev 6	Vogtle
Release of gaseous radioactivity resulting in offsite dose greater than 100 mrem TEDE or 500 mrem thyroid CDE.	Release of gaseous radioactivity resulting in offsite dose greater than 100 mrem TEDE or 500 mrem thyroid CDE.

Difference / Deviation / Justification

None

THRESHOLDS

NEI 99-01 Rev 6	Vogtle
(1) Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer: (site-specific monitor list and threshold values) (2) Dose assessment using actual meteorology indicates doses greater than 100 mrem TEDE or 500 mrem thyroid CDE at or beyond (site-specific dose receptor point). (3) Field survey results indicate **EITHER** of the following at or beyond (site-specific dose receptor point): • Closed window dose rates greater than 100 mR/hr expected to continue for 60 minutes or longer. • Analyses of field survey samples indicate thyroid CDE greater than 500 mrem for one hour of inhalation.	(1) Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer: Plant Vent RE-12444E — 5.0 µCi/cc Turbine Building Vent (SJAE) RE-12839E — 2.1 x 10^2 µCi/cc (2) Dose assessment using actual meteorology indicates doses greater than 100 mrem TEDE or 500 mrem thyroid CDE at or beyond the site boundary. (3) Field survey results indicate **EITHER** of the following at or beyond the site boundary: • Closed window dose rates greater than 100 mR/hr expected to continue for 60 minutes or longer. • Analyses of field survey samples indicate thyroid CDE greater than 500 mrem for one hour of inhalation.

Difference / Deviation / Justification

Difference: Site specific information provided. See V2 Rad Monitor Calculations and V3 ODCM Site Boundary Reference.

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

RS2: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Vogtle**
Spent fuel pool level at (site-specific Level 3 description).	Spent fuel pool level at 194 foot level (Level 3).
Difference / Deviation / Justification	
None	
THRESHOLDS	
NEI 99-01 Rev 6	**Vogtle**
(1) Lowering of spent fuel pool level to (site-specific Level 3 value).	(1) Lowering of spent fuel pool level to 194 foot level (Level 3).
Difference / Deviation / Justification	
Difference: Site specific information provided. See V4 SFP Level 3&2 Indications.	

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

RA1: INITIATING CONDITIONS

NEI 99-01 Rev 6	Vogtle
Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.	Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.
Difference / Deviation / Justification	
None	

THRESHOLDS

NEI 99-01 Rev 6	Vogtle
(1) Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer: (site-specific monitor list and threshold values) (2) Dose assessment using actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point). (3) Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point) for one hour of exposure. (4) Field survey results indicate **EITHER** of the following at or beyond (site-specific dose receptor point): • Closed window dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer. • Analyses of field survey samples indicate thyroid CDE greater than 50 mrem for one hour of inhalation.	(1) Reading on ANY of the following radiation monitors greater than the reading shown for 15 minutes or longer: Plant Vent RE-12444E — 0.50 µCi/cc Turbine Building Vent (SJAE) RE-12839D — 2.1×10^{1} µCi/cc (2) Dose assessment using actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond the site boundary. (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 the site boundary for one hour of exposure. (4) Field survey results indicate **EITHER** of the following at or beyond the site boundary: • 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.
Difference / Deviation / Justification	
Difference: Site specific information provided. See V2 Rad Monitor Calculations and V3 ODCM Site Boundary Reference.	

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

<table>
<tr><th colspan="2">RA2: INITIATING CONDITIONS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Vogtle</td></tr>
<tr><td>Significant lowering of water level above, or damage to, irradiated fuel.</td><td>Significant lowering of water level above, or damage to, irradiated fuel.</td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">None</td></tr>
<tr><th colspan="2">THRESHOLDS</th></tr>
<tr><td>NEI 99-01 Rev 6</td><td>Vogtle</td></tr>
<tr><td>(1) Uncovery of irradiated fuel in the REFUELING PATHWAY.
(2) Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by ANY of the following radiation monitors: (site-specific listing of radiation monitors, and the associated readings, setpoints and/or alarms)
(3) Lowering of spent fuel pool level to (site-specific Level 2 value).</td><td>(1) Uncovery of irradiated fuel in the REFUELING PATHWAY.
(2) Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by ANY of the following radiation monitors:
<table><tr><td>Fuel Handling Building RE-008</td></tr><tr><td>CNMT BLDG Low Range** RE-002/003
**Mode 6 only during fuel movement</td></tr><tr><td>Fuel Handling BLDG EFFL. ARE-2532 A/B</td></tr><tr><td>Fuel Handling BLDG EFFL. ARE-2533 A/B</td></tr></table>(3) Lowering of spent fuel pool level to 204 feet (Level 2).</td></tr>
<tr><td colspan="2">Difference / Deviation / Justification</td></tr>
<tr><td colspan="2">Difference: Site specific information provided. See V4 SFP Level 3&2 Indications and V5 Annunciator Response Procedure.</td></tr>
</table>

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

RA3: INITIATING CONDITIONS

NEI 99-01 Rev 6	Vogtle
Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.	Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.

Difference / Deviation / Justification

None

THRESHOLDS

NEI 99-01 Rev 6	Vogtle
(1) Dose rate greater than 15 mR/hr in **ANY** of the following areas: • Control Room • Central Alarm Station • (other site-specific areas/rooms) (2) An UNPLANNED event results in radiation levels that prohibit or impede access to any of the following plant rooms or areas: (site-specific list of plant rooms or areas with entry-related mode applicability identified)	(1) Dose rate greater than 15 mR/hr in **ANY** of the following areas: • Control Room (RE-001) • Central Alarm Station (Survey Only) (2) An UNPLANNED event results in radiation levels that prohibit or impede access to any Table H1 plant rooms or areas:

Table H1

Building	Room Number	Applicable Mode
Control Building	1CB-226, 1CB-A45, 2CB-223, 2CB-A22	3
	1CB-A77, 1CB-B61, 1CB-B76, 1CB-B79 2CB-A79, 2CB-B01 2CB-B04, 2CB-B18	3
	1CB-226, 1CB-A45 1CB-B84, 2CB-B85 2CB-223, 2CB-A22	4
	1CB-A48, 1CB-A50 2CB-A15, 2CB-A16	4
AFW Pump House	AFW Pump Operation and standby Readiness	1, 2, 3

	<table><tr><td>Auxiliary Building</td><td>1AB-A28, 2AB-A72 A-level demin vessel valve galleries</td><td>1, 2, 3</td></tr><tr><td></td><td>1AB-A24, 2AB-A77</td><td>3</td></tr><tr><td></td><td>1AB-A08, 2AB-A101</td><td>3</td></tr><tr><td></td><td>1AB-C85, 1AB-C89 2AB-C38, 2AB-C44</td><td>4</td></tr><tr><td></td><td>1AB-B15 MEZZ 1AB-B19 MEZZ 2AB-B117 MEZZ 2AB-B119 MEZZ</td><td>4</td></tr></table>
Difference / Deviation / Justification	
Difference: **EAL Threshold (1) – NEI 99-01 Rev 6 has bullet for other site-specific areas/rooms. Vogtle does not identify other areas/rooms applicable to this threshold. Site specific information provided. See V6 Annuciator Response Procedure (Control Room) Reference.** **Justification:** **No additional rooms at Vogtle have been determined to be applicable to this EAL threahold.** **Difference:** **Vogtle EAL Threshold (2) provides site specific room listing in tabular format (Table H1).** **Justification:** **Editorial change – Human Factors consideration.**	

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

RU1: INITIATING CONDITIONS

NEI 99-01 Rev 6	Vogtle
Release of gaseous or liquid radioactivity greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer.	Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.

Difference / Deviation / Justification

None

THRESHOLDS

NEI 99-01 Rev 6	Vogtle
(1) Reading on **ANY** effluent radiation monitor greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer: (site-specific monitor list and threshold values corresponding to 2 times the controlling document limits) (2) Reading on **ANY** effluent radiation monitor greater than 2 times the alarm setpoint established by a current radioactivity discharge permit for 60 minutes or longer. (3) Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer.	(1) Reading on **ANY** effluent radiation monitor greater than 2 times the ODCM limits for 60 minutes or longer: SG Blowdown Effluent Line (RE-0021) — 2 x release permit setpoint Turbine Bldg Effluent Line (RE-0848) — 2 x release permit setpoint Turbine Bldg Vent, SJAE (RE-12839) — 2 x release permit setpoint Plant Vent (RE-12442C) — 2 x release permit setpoint Plant Vent (RE-12444C) — 2 x release permit setpoint (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. Liquid Radwaste Effluent Line (RE-0018) — 2 x release permit setpoint Gaseous Radwaste (ARE-0014) — 2 x release permit setpoint (3) Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times ODCM limits for 60 minutes or longer.

Difference / Deviation / Justification

Difference: Site specific information provided. See V2 Rad Monitor Calculations.

ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT ICS/EALS

RU2: INITIATING CONDITIONS	
NEI 99-01 Rev 6	**Vogtle**
UNPLANNED loss of water level above irradiated fuel.	UNPLANNED loss of water level above irradiated fuel.
Difference / Deviation / Justification	
None	

THRESHOLDS	
NEI 99-01 Rev 6	**Vogtle**
(1) a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following: (site-specific level indications). **AND** b. UNPLANNED rise in area radiation levels as indicated by **ANY** of the following radiation monitors. (site-specific list of area radiation monitors)	(1) a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following: Personnel report of low water level LSHL-0625 off scale low (ALB05 E02) **AND** b. UNPLANNED rise in area radiation levels as indicated by **ANY** of the following radiation monitors. RE-0008 in the spent fuel pool building RE-0002, -0003, -0004 in containment * RE-0011 at the seal table * RE-0005, -0006 in containment * * Not applicable in Modes 1-4
Difference / Deviation / Justification	
Difference: **Site specific information provided. See V7 Annunciator Response Procedure (SFP Level) Reference and V8 Rad Monitor Information.**	