



**ENERGY
NORTHWEST**

License Amendment Request to Change Emergency Action Level Scheme

Energy Northwest

June 30, 2016

Participants

- ✦ Sean Clizbe – Manager, Emergency Preparedness
- ✦ Lisa Williams – Supervisor, Licensing
- ✦ Rick Garcia – Principle Licensing Engineer
- ✦ Dan King – Emergency Program Coordinator
- ✦ Kelly Walker - Operations Support Services, Inc.

Presentation Outline

- ✦ Proposed Change
- ✦ LAR Content
- ✦ Comparison to NEI 99-01 Rev 6
- ✦ LAR & Implementation Schedule
- ✦ Questions

Proposed Change

- ✦ Adopt new EAL scheme based on NEI 99-01, Rev 6

LAR Content

- ✦ LAR is developed in accordance with general guidelines in 10 CFR 50.90 and in consideration of recent EAL upgrade precedents. Information provided includes:
 - Evaluation of Proposed Changes
 - EAL Bases Document
 - Comparison Matrix to NEI 99-01 Rev 6
 - EAL Wall Charts
 - EAL Bases Document (redline version)
 - EAL supporting calculations
- ✦ Recent EP FAQs through 2015-014 have been considered.

Comparison to NEI 99-01 Rev 6

- ✦ Proposed EALs are largely consistent with NEI 99-01, Rev 6
- ✦ Differences and Deviations have been identified per guidance established in RIS 2003-18 and its associated supplements
- ✦ Differences include:
 - Minor terminology changes to reduce EAL user reading burden
 - Slight variations in EAL categorization and nomenclature
- ✦ Two deviations identified (details on following page)

Deviations from NEI 99-01 Rev 6

- ✦ Initiating Condition HG1 – Hostile Action resulting in loss of physical control of the facility is not being implemented
 - Covered by redundant EALs
 - Bounded by other ICs
- ✦ Initiating Condition HS6 – Inability to control a key safety function from outside the Control Room modified to delete defueled mode applicability and reactivity control safety function limited to modes 1 & 2 only
 - Safety functions not required to be controlled in a defueled reactor due to no energy source
 - In modes 3-5, adequate shutdown margin exists under all conditions

LAR and Implementation Schedule

- ✦ LAR submittal date on or before July 28, 2016
- ✦ Approval requested within 1 year of submittal
- ✦ Implementation by September 7, 2017
 - Accommodates Spring 2017 refueling outage & available training windows for Operations and Emergency Response Organization

Questions