



FirstEnergy Nuclear Operating Company

Beaver Valley Power Station  
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September 7, 2017  
L-17-275

10 CFR 50, Appendix E

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:**

Beaver Valley Power Station, Unit Nos. 1 and 2  
BV-1 Docket No. 50-334, License No. DPR-66  
BV-2 Docket No. 50-412, License No. NPF-73  
Supplement to Request for Licensing Action to Revise the Emergency Plan  
(CAC Nos. MF8448 AND MF8449)

By correspondence dated September 28, 2016 (Accession No. ML16277A194), as supplemented by correspondence dated May 10, 2017 (Accession No. ML17144A484) FirstEnergy Nuclear Operating Company (FENOC) submitted a request to revise the current Beaver Valley Power Station Units 1 and 2 (BVPS) Emergency Plan emergency action level scheme to one based on Nuclear Energy Institute (NEI) 99-01, "Development of Emergency Action Levels for Non-Passive Reactors," Revision 6.

After consultation with officials from the Commonwealth of Pennsylvania FENOC has determined not to pursue the Emergency Action Level (EAL) change recommended in EPFAQ 2015-013. Therefore, FENOC has revised the original license amendment request contained in the September 28, 2016 letter, to include the Initiating Condition HG1. As a result, the Emergency Action Level (EAL) Bases Document has been revised to incorporate HG1 into the security related EALs. Enclosure A provides the marked-up security-related EAL Bases Document, Enclosure B provides the resulting clean pages associated with the security EALs, and Enclosure C provides an EAL Comparison Matrix for HG1.

The information contained in this supplement does not impact the conclusions of the significant hazards consideration determination or environmental considerations of the original request provided in Enclosure A of FENOC letter dated September 28, 2016 (Accession No. ML16277A194).

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There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at 330-761-6071.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 7, 2017.

Sincerely,



Richard D. Bologna

Enclosures:

- A. Emergency Action Level (EAL) Bases Document - Security Initiating Conditions Only (Mark-Up)
- B. Emergency Action Level (EAL) Bases Document – Security Initiating Conditions Only (Retyped)
- C. Beaver Valley Power Station, Unit Nos. 1 and 2, NEI 99-01, Revision 6, EAL Comparison Matrix for HG1

cc: NRC Region I Administrator  
NRC Resident Inspector  
NRC Project Manager  
Director BRP/DEP  
Site BRP/DEP Representative

Enclosure A

L-17-275

Emergency Action Level (EAL) Bases Document - Security Initiating  
Conditions Only (Mark-Up)

(22 Pages Follow)

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 1:

Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HU1.1**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.1 Unusual Event**

A SECURITY CONDITION that does **not** involve a HOSTILE ACTION as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

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ATTACHMENT 1:

Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HU1.2**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.2 Unusual Event**

Notification of a credible security threat directed at the site

**Mode Applicability:**

All

**Basis:**

This IC addresses events that pose a threat to plant personnel or SAFETY SYSTEM equipment, and thus represent a potential degradation in the level of plant safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under ICs HA1, ~~and~~ HS1, ~~and~~ HG1. Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to plant personnel and Offsite Response Organizations.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*

This EAL addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

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**EMERGENCY ACTION LEVEL Bases**

ATTACHMENT 1:

Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HU1.3**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.3 Unusual Event**

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

**Mode Applicability:**

All

**Basis:**

This IC addresses events that pose a threat to plant personnel or SAFETY SYSTEM equipment, and thus represent a potential degradation in the level of plant safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under ICs HA1, ~~and~~ HS1 ~~and~~ HG1. Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to plant personnel and Offsite Response Organizations.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency*

This EAL addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with the (site-specific procedure).

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan.

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

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**Emergency Preparedness Plan**

No Changes - Information Only

ATTACHMENT 1:  
Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HA1.1**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.1 Alert**

A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

This EAL is applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA.

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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ATTACHMENT 1:  
Unit 1 EAL Technical Bases

**HA1.1**

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

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**EMERGENCY ACTION LEVEL Bases**

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ATTACHMENT 1:

Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HA1.2**

**Subcategory:** 1 – Security

**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.2 Alert**

A validated notification from NRC of an aircraft attack threat within **30 min.** of the site

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

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

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

**EMERGENCY ACTION LEVEL Bases****No Changes - Information Only**ATTACHMENT 1:Unit 1 EAL Technical Bases**HA1.2**

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

## EMERGENCY ACTION LEVEL Bases

ATTACHMENT 1:Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HS1.1**

**Subcategory:** 1 – Security

**Initiating Condition:** HOSTILE ACTION within the PROTECTED AREA

**EAL:****HS1.1 Site Area Emergency**

A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Escalation of the emergency classification level would be via IC [FG1HG1](#).

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ATTACHMENT 1:  
Unit 1 EAL Technical Bases

**HS1.1**

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HS1

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ATTACHMENT 1:

Unit 1 EAL Technical Bases

Category: H – Hazards and Other Conditions Affecting Plant Safety **HG1.1**

Subcategory: 1 – Security

Initiating Condition: HOSTILE ACTION resulting in loss of physical control of the facility.

EAL:

**HG1.1 General Emergency**

A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor (site specific security shift supervisor)

AND EITHER of the following has occurred:

1. ANY of the following safety functions cannot be controlled or maintained.

- Reactivity Control (ability to shut down the reactor and keep it shut down)
- Core Cooling [PWR] / RPV water level [BWR]
- RCS heat removal

OR

2. Damage to spent fuel has occurred or is IMMINENT

**Mode Applicability:**

All

**Basis:**

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g. pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained as determined by the lowering of the spent fuel pool level (LI-1FC-200A/B) reading  $\leq$  0.5 ft. (Level 3) or cannot be monitored for two hours or longer.

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

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Unit 1 EAL Technical Bases

**HG1.1**

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security/Contingency Plan (ref 1).

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HG1
3. NEI 99-01 Rev. 6 AS2
4. ECP No. 13-0561-000, Reference Documents for ECP-13-0561 – Installation of Spent Fuel Pool Level Instrumentation for Beyond Design Basis External Events

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ATTACHMENT 3:  
Unit 2 EAL Technical Bases

**Category:** H – Hazards **HU1.1**  
**Subcategory:** 1 – Security  
**Initiating Condition:** Confirmed SECURITY CONDITION or threat  
**EAL:**

**HU1.1 Unusual Event**  
A SECURITY CONDITION that does **not** involve a HOSTILE ACTION as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

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ATTACHMENT 3:

Unit 2 EAL Technical Bases

**Category:** H – Hazards

**HU1.2**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.2 Unusual Event**

Notification of a credible security threat directed at the site

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

This EAL addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with the BVPS Physical Security Plan/Contingency Plan. Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

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ATTACHMENT 3:

Unit 2 EAL Technical Bases

**Category:** H – Hazards

**HU1.3**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.3 Unusual Event**

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

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency.

This EAL addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with (site-specific procedure).

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

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ATTACHMENT 3:  
Unit 2 EAL Technical Bases

**Category:** H – Hazards **HA1.1**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.1 Alert**

A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

This EAL is applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA.

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Unit 2 EAL Technical Bases

No Changes - Information Only

**HA1.1**

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Escalation of the emergency classification level would be via HS1.

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

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ATTACHMENT 3:  
Unit 2 EAL Technical Bases

**Category:** H – Hazards **HA1.2**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.2 Alert**

A validated notification from NRC of an aircraft attack threat within **30 min.** of the site

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

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

ATTACHMENT 3:

Unit 2 EAL Technical Bases

No Changes - Information Only

**HA1.2**

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

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Escalation of the emergency classification level would be via HS1.

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:  
Unit 2 EAL Technical Bases

**Category:** H – Hazards **HS1.1**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the PROTECTED AREA  
**EAL:**

**HS1.1 Site Area Emergency**

A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Escalation of the emergency classification level would be via IC [FG+HG1](#).

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:  
Unit 2 EAL Technical Bases

No Changes - Information Only

**HS1.1**

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HS1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:  
Unit 2 EAL Technical Bases

Category: H – Hazards

**HG1.1**

Subcategory: 1 – Security

Initiating Condition: HOSTILE ACTION resulting in loss of physical control of the facility.

EAL:

**HG1.1 General Emergency**

A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor (site specific security shift supervisor).

AND EITHER of the following has occurred:

1. ANY of the following safety functions cannot be controlled or maintained.

- Reactivity control (ability to shut down the reactor and keep it shut down)
- Core cooling [PWR]/RPV water level [BWR]
- RCS heat removal

OR

2. Damage to the spent fuel has occurred or is IMMINENT

Mode Applicability:

All

Basis:

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g., pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level can not be maintained as determined by the lowering of the spent fuel pool level (2FNC-LI101A/B) reading  $\leq$  0.5 ft. (Level 3) or cannot be monitored for two hours or longer.

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

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:  
Unit 2 EAL Technical Bases

**HG1.1**

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security/Contingency Plan (ref. 1).

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HG1
3. NEI 99-01 Rev. 6 AS2
4. ECP No. 13-0561-000, Reference Documents for ECP-13-0561 – Installation of Spent Fuel Pool Level Instrumentation for Beyond Design Basis External Events

Enclosure B

L-17-275

Emergency Action Level (EAL) Bases Document - Security Initiating  
Conditions Only (Retyped)

(22 Pages Follow)

**Section 4**

**Emergency Preparedness Plan**

**EMERGENCY ACTION LEVEL Bases**

ATTACHMENT 1:

Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HU1.1**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.1 Unusual Event**  
A SECURITY CONDITION that does **not** involve a HOSTILE ACTION as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 1:

Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HU1.2**  
**Subcategory:** 1 – Security  
**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.2 Unusual Event**

Notification of a credible security threat directed at the site

**Mode Applicability:**

All

**Basis:**

This IC addresses events that pose a threat to plant personnel or SAFETY SYSTEM equipment, and thus represent a potential degradation in the level of plant safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under ICs HA1, HS1, and HG1. Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to plant personnel and Offsite Response Organizations.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*

This EAL addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

**EMERGENCY ACTION LEVEL Bases**ATTACHMENT 1:Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HU1.3**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:****HU1.3 Unusual Event**

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

**Mode Applicability:**

All

**Basis:**

This IC addresses events that pose a threat to plant personnel or SAFETY SYSTEM equipment, and thus represent a potential degradation in the level of plant safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under ICs HA1, HS1 and HG1. Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to plant personnel and Offsite Response Organizations.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency*

This EAL addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with the (site-specific procedure).

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan.

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

No Changes - Information Only

ATTACHMENT 1:  
Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HA1.1**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.1 Alert**

A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

This EAL is applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA.

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

**No Changes - Information Only**

ATTACHMENT 1:  
Unit 1 EAL Technical Bases

**HA1.1**

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

No Changes - Information Only

ATTACHMENT 1:  
Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HA1.2**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.2 Alert**

A validated notification from NRC of an aircraft attack threat within **30 min.** of the site

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

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

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

**EMERGENCY ACTION LEVEL Bases**

No Changes - Information Only

ATTACHMENT 1:

Unit 1 EAL Technical Bases

**HA1.2**

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

**EMERGENCY ACTION LEVEL Bases**ATTACHMENT 1:Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HS1.1**

**Subcategory:** 1 – Security

**Initiating Condition:** HOSTILE ACTION within the PROTECTED AREA

**EAL:****HS1.1 Site Area Emergency**

A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 1:

Unit 1 EAL Technical Bases

No Changes - Information Only

**HS1.1**

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HS1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 1:

Unit 1 EAL Technical Bases

**Category:** H – Hazards and Other Conditions Affecting Plant Safety **HG1.1**

**Subcategory:** 1 – Security

**Initiating Condition:** HOSTILE ACTION resulting in loss of physical control of the facility.

**EAL:**

**HG1.1 General Emergency**

A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor

**AND EITHER** of the following has occurred:

1. **ANY** of the following safety functions cannot be controlled or maintained.
  - Reactivity Control (ability to shut down the reactor and keep it shut down)
  - Core Cooling
  - RCS heat removal

**OR**

2. Damage to spent fuel has occurred or is IMMINENT

**Mode Applicability:**

All

**Basis:**

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g. pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained as determined by the lowering of the spent fuel pool level (LI-1FC-200A/B) reading  $\leq 0.5$  ft. (Level 3) or cannot be monitored for two hours or longer.

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

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 1:

Unit 1 EAL Technical Bases

**HG1.1**

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security/Contingency Plan (ref 1).

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HG1
3. NEI 99-01 Rev. 6 AS2
4. ECP No. 13-0561-000, Reference Documents for ECP-13-0561 – Installation of Spent Fuel Pool Level Instrumentation for Beyond Design Basis External Events

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:

Unit 2 EAL Technical Bases

**Category:** H – Hazards

**HU1.1**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.1 Unusual Event**

A SECURITY CONDITION that does **not** involve a HOSTILE ACTION as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

**EMERGENCY ACTION LEVEL Bases**ATTACHMENT 3:Unit 2 EAL Technical Bases**Category:** H – Hazards**HU1.2****Subcategory:** 1 – Security**Initiating Condition:** Confirmed SECURITY CONDITION or threat**EAL:****HU1.2 Unusual Event**

Notification of a credible security threat directed at the site

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

This EAL addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with the BVPS Physical Security Plan/Contingency Plan. Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:

Unit 2 EAL Technical Bases

**Category:** H – Hazards

**HU1.3**

**Subcategory:** 1 – Security

**Initiating Condition:** Confirmed SECURITY CONDITION or threat

**EAL:**

**HU1.3 Unusual Event**

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

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency.

This EAL addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with (site-specific procedure).

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HU1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:

Unit 2 EAL Technical Bases

No Changes - Information Only

**Category:** H – Hazards **HA1.1**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.1 Alert**

A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervisor

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

This EAL is applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA.

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:

Unit 2 EAL Technical Bases

**No Changes - Information Only**

**HA1.1**

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Escalation of the emergency classification level would be via HS1.

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

**Section 4  
EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:

Unit 2 EAL Technical Bases

No Changes - Information Only

**Category:** H – Hazards **HA1.2**  
**Subcategory:** 1 – Security  
**Initiating Condition:** HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes

**EAL:**

**HA1.2 Alert**

A validated notification from NRC of an aircraft attack threat within **30 min.** of the site

**Mode Applicability:**

All

**Basis:**

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*.

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

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

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

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:

Unit 2 EAL Technical Bases

No Changes - Information Only

**HA1.2**

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

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

Escalation of the emergency classification level would be via HS1.

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HA1

EMERGENCY ACTION LEVEL Bases

ATTACHMENT 3:

Unit 2 EAL Technical Bases

Category: H – Hazards

HS1.1

Subcategory: 1 – Security

Initiating Condition: HOSTILE ACTION within the PROTECTED AREA

EAL:

**HS1.1 Site Area Emergency**  
A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor

Mode Applicability:

All

Basis:

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

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

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan* .

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

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security Plan/Contingency Plan (ref. 1).

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

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:

Unit 2 EAL Technical Bases

No Changes - Information Only

**HS1.1**

**Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HS1

**Section 4**  
**EMERGENCY ACTION LEVEL Bases**

**Emergency Preparedness Plan**

ATTACHMENT 3:  
Unit 2 EAL Technical Bases

**Category:** H – Hazards

**HG1.1**

**Subcategory:** 1 – Security

**Initiating Condition:** HOSTILE ACTION resulting in loss of physical control of the facility.

**EAL:**

**HG1.1 General Emergency**

A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor .

**AND EITHER** of the following has occurred:

1. **ANY** of the following safety functions cannot be controlled or maintained.
  - Reactivity control (ability to shut down the reactor and keep it shut down)
  - Core cooling
  - RCS heat removal

**OR**

2. Damage to the spent fuel has occurred or is IMMINENT

**Mode Applicability:**

All

**Basis:**

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g., pumps, heat exchangers, controls. etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level can not be maintained as determined by the lowering of the spent fuel pool level (2FNC-LI101A/B) reading  $\leq 0.5$  ft. (Level 3) or cannot be monitored for two hours or longer.

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

## Section 4

## Emergency Preparedness Plan

### EMERGENCY ACTION LEVEL Bases

#### ATTACHMENT 3:

#### Unit 2 EAL Technical Bases

### HG1.1

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

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security/Contingency Plan (ref. 1).

#### **Basis Reference(s):**

1. BVPS Physical Security Plan/Contingency Plan (Safeguards)
2. NEI 99-01 Rev. 6 HG1
3. NEI 99-01 Rev. 6 AS2
4. ECP No. 13-0561-000, Reference Documents for ECP-13-0561 – Installation of Spent Fuel Pool Level Instrumentation for Beyond Design Basis External Events

Enclosure C

L-17-275

Beaver Valley Power Station, Unit Nos. 1 and 2, NEI 99-01, Revision 6,  
EAL Comparison Matrix for HG1

(7 Pages Follow)

**Beaver Valley Power Station Unit 1&2  
NEI 99-01 Revision 6  
HG1 EAL Comparison Matrix**

BVPS Unit No. 1 EAL Comparison Matrix

NEI IC#	NEI IC Wording	BVPS IC#	BVPS IC Wording	Difference/Deviation 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	<u>Deviations:</u> None  <u>Differences:</u> None

NEI Ex EAL#	NEI Example EAL Wording	BVPS Example EAL#	BVPS EAL Wording	Difference/Deviation Justification
1	<p>a. A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-specific security shift supervision).</p> <p><b>AND</b></p> <p>b. <b>EITHER</b> of the following has occurred:</p> <p>1. <b>ANY</b> of the following safety functions cannot be controlled or maintained.</p> <ul style="list-style-type: none"> <li>● Reactivity control</li> <li>● Core cooling [PWR]/RPV water level [BWR]</li> <li>● RCS heat removal</li> </ul> <p><b>OR</b></p> <p>2. Damage to spent fuel has occurred or is IMMINENT.</p>	HG1.1	<p>A Hostile Action is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor</p> <p><b>AND EITHER</b> of the following has occurred:</p> <p>1. <b>ANY</b> of the following safety functions cannot be controlled or maintained</p> <ul style="list-style-type: none"> <li>● Reactivity control (ability to shut down the reactor and keep it shut down)</li> <li>● Core cooling</li> <li>● RCS heat removal</li> </ul> <p><b>OR</b></p> <p>2. Damage to spent fuel has occurred or is IMMINENT.</p>	<p><u>Deviations:</u> None</p> <p><u>Differences:</u></p> <ul style="list-style-type: none"> <li>● The security shift supervision is defined as the Security Shift Supervisor.</li> <li>● Added the following clarification to Reactivity Control “ability to shut down the reactor and keep it shut down)”</li> <li>● BVPS is a PWR and thus RPV water level does not apply.</li> </ul>

BVPS Unit No. 1 EAL Comparison Matrix

NEI Example Basis Wording	BVPS Basis Wording	Difference/Deviation Justification
<p>This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g. pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained.</p> <p>Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.</p> <p>Security plans and terminology are based on the guidance provided by NEI 03-12, <i>Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]</i>.</p> <p>Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the Security Plan.</p>	<p>This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g. pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained as determined by the lowering of the spent fuel pool level (LI-1FC-200A/B) reading <math>\leq 0.5</math> ft. (Level 3) or cannot be monitored for two hours or longer.</p> <p>Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.</p> <p>Security plans and terminology are based on the guidance provided by NEI 03-12, <i>Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]</i>.</p> <p>Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security/Contingency Plan (ref 1).</p>	<p><u>Deviations:</u> None</p> <p><u>Difference:</u></p> <ul style="list-style-type: none"> <li>• Added the following clarification to basis section to address imminent damage to spent fuel pool “as determined by the lowering of the spent fuel pool level (LI-1FC-200A/B) reading <math>\leq 0.5</math> ft. (Level 3) or cannot be monitored for two hours or longer.”</li> <li>• Basis section was revised to reference “BVPS Physical Security/Contingency Plan (ref 1)” as it is the site-specific Security Plan.</li> <li>• Added the site-specific list of HG1 basis references.</li> </ul>

BVPS Unit No. 1 EAL Comparison Matrix

	<p><b>Basis Reference(s):</b></p> <ol style="list-style-type: none"><li>1. BVPS Physical Security Plan/Contingency Plan (Safeguards)</li><li>2. NEI 99-01 Rev. 6 HG1</li><li>3. NEI 99-01 Rev. 6 AS2</li><li>4. ECP No. 13-0561-000, Reference Documents for ECP-13-0561 – Installation of Spent Fuel Pool Level Instrumentation for Beyond Design Basis External Events</li></ol>	
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BVPS Unit No. 2 EAL Comparison Matrix

NEI IC#	NEI IC Wording	BVPS IC#	BVPS IC Wording	Difference/Deviation 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	<u>Deviations:</u> None  <u>Differences:</u> None

NEI Ex EAL#	NEI Example EAL Wording	BVPS Example EAL#	BVPS EAL Wording	Difference/Deviation Justification
1	<p>a. A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-specific security shift supervision).</p> <p><b>AND</b></p> <p>b. <b>EITHER</b> of the following has occurred:</p> <p>1. <b>ANY</b> of the following safety functions cannot be controlled or maintained.</p> <ul style="list-style-type: none"> <li>● Reactivity control</li> <li>● Core cooling [PWR]/RPV water level [BWR]</li> <li>● RCS heat removal</li> </ul> <p><b>OR</b></p> <p>2. Damage to spent fuel has occurred or is IMMINENT</p>	HG1.1	<p>A Hostile Action is occurring or has occurred within the PROTECTED AREA as reported by the Security Shift Supervisor</p> <p><b>AND EITHER</b> of the following has occurred:</p> <p>1. <b>ANY</b> of the following safety functions cannot be controlled or maintained</p> <ul style="list-style-type: none"> <li>● Reactivity control (ability to shut down the reactor and keep it shut down)</li> <li>● Core cooling</li> <li>● RCS heat removal</li> </ul> <p><b>OR</b></p> <p>2. Damage to spent fuel has occurred or is IMMINENT.</p>	<p><u>Deviations:</u> None</p> <p><u>Differences:</u> The security shift supervision is defined as the Security Shift Supervisor.</p> <p>Added the following clarification to Reactivity Control “ability to shut down the reactor and keep it shut down)”</p> <p>BVPS is a PWR and thus RPV water level does not apply.</p>

BVPS Unit No. 2 EAL Comparison Matrix

NEI Example Basis Wording	BVPS Basis Wording	Difference/Deviation Justification
<p>This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g. pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained.</p> <p>Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.</p> <p>Security plans and terminology are based on the guidance provided by NEI 03-12, <i>Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]</i>.</p> <p>Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the Security Plan.</p>	<p>This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g., pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level can not be maintained as determined by the lowering of the spent fuel pool level (2FNC-LI101A/B) reading <math>\leq 0.5</math> ft. (Level 3) or cannot be monitored for two hours or longer.</p> <p>Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.</p> <p>Security plans and terminology are based on the guidance provided by NEI 03-12, <i>Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]</i>.</p> <p>Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the BVPS Physical Security/Contingency Plan (ref. 1).</p>	<p><u>Deviations:</u> None</p> <p><u>Difference:</u></p> <ul style="list-style-type: none"> <li>Added the following clarification to basis section to address imminent damage to spent fuel pool “as determined by the lowering of the spent fuel pool level (2FNC-LI101 A/B) reading <math>\leq 0.5</math> ft. (Level 3) or cannot be monitored for two hours or longer.”</li> <li>Basis section was revised to reference “BVPS Physical Security/Contingency Plan (ref 1)” as it is the site-specific Security Plan.</li> <li>Added the site-specific list of HG1 basis references.</li> </ul>

BVPS Unit No. 2 EAL Comparison Matrix

	<b>Basis Reference(s):</b> <ol style="list-style-type: none"><li>1. BVPS Physical Security Plan/Contingency Plan (Safeguards)</li><li>2. NEI 99-01 Rev. 6 HG1</li><li>3. NEI 99-01 Rev. 6 AS2</li><li>4. ECP No. 13-0561-000, Reference Documents for ECP-13-0561 – Installation of Spent Fuel Pool Level Instrumentation for Beyond Design Basis External Events</li></ol>	
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