

LES-18-168-NRC

**Enclosure 1**

EP-3-0200-01, Classification of Emergency Events, Revision 8

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# Classification of Emergency Events

## EP-3-0200-01

### Revision 8

### Level 2 - Reference Use

Safety and Emergency Response Manager

Effective Date	12/19/2018
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**Classification of Emergency Events**

EP-3-0200-01  
Rev. 8  
Level 2 - Reference Use  
Page 2 of 14

**Revision Summary**

<b>Change</b>	<b>Reason for Change</b>
Updated Owner's Title	Match Current Org Chart. Editorial Correction
Step 3.7 – Updated definition	Satisfies EV 126485 Editorial Correction
Step 8.1.2 – Added new reference	Editorial correction

**TABLE OF CONTENTS**

**1. PURPOSE.....4**

**2. SCOPE.....4**

**3. TERMS, DEFINITIONS, ABBREVIATIONS, AND ACRONYMS .....4**

**4. RESPONSIBILITIES .....6**

**5. MAIN BODY .....6**

    5.1 Discovery of Abnormal Plant Conditions or Activities.....6

    5.2 Declaration of ALERT or SITE AREA EMERGENCY .....7

**6. DOCUMENTATION AND RECORDS .....8**

**7. LICENSE COMMITMENTS AND REQUIREMENTS .....8**

**8. REFERENCES .....9**

**ATTACHMENTS**

Attachment 1, Emergency Action Levels .....10

**FORMS**

EP-3-0200-01-F-1, Emergency Director Turnover Briefing Form .....14

**1. PURPOSE**

- 1.1 Provide guidance for the following in accordance with the Emergency Plan. (7.1, 7.2, 7.4)
- Classifying an emergency according to severity.
  - Assigning responsibilities for emergency actions.
  - Establishing lines of authority and communication during an emergency.
  - Initiating emergency actions to protect the public, plant personnel, and the environment.
  - Upgrading the emergency classification when the severity of the event changes.

**2. SCOPE**

- 2.1 This procedure applies to the Shift Manager or Emergency Director when assessing and determining the appropriate emergency classification level whenever a real or potential plant emergency is identified as established in the Emergency Plan.

**3. TERMS, DEFINITIONS, ABBREVIATIONS, AND ACRONYMS**

3.1 Activation

- 3.1.1 Actions taken to staff and set up an emergency facility for operation. Includes notification of emergency personnel, facility/area staffing, equipment setup, and equipment operability testing.

3.2 ALERT

- 3.2.1 An incident that has led or could lead to a release to the environment of radioactive or other hazardous material, but the release is not expected to require a response by an offsite response organization to protect persons offsite. An Alert involves emergency situations that could have direct effect on health and safety of plant personnel.
- 3.2.2 An ALERT requires mobilization of the site's Emergency Response Organization, and may result in requests for offsite response organizations to respond to the site.

3.3 Emergency Action Level

- 3.3.1 An Emergency Action Level is a pre-determined, site-specific, observable threshold for a plant condition that places the plant in an emergency classification (ALERT or SITE AREA EMERGENCY).

3.4 Offsite

- 3.4.1 Area outside boundary of the URENCO USA property.

3.5 Onsite

3.5.1 Area within the URENCO USA owned property where access control can be established to limit access to the general public. The site boundary is the designated division between onsite and offsite.

3.6 Operational

3.6.1 Status of an emergency facility, or field-based function, declared by the appropriate emergency response manager upon determining that the facility/area is adequately staffed and equipment is set up and available to perform the emergency functions assigned to that facility/area.

3.7 Protective Action

3.7.1 Physical measures, such as evacuation or sheltering, taken to prevent potential health hazards (example: hazardous materials release, fire, severe weather) from adversely affecting employees or the offsite population.

- a. Evacuation – Protective action taken to move personnel out of a hazardous location. There are two levels of evacuations, local area in which personnel are directed to leave or avoid a specific area affected by an emergency event, and site-wide in which personnel are directed to leave the site.
- b. Take Cover – Protective action taken to provide structural protection. Take cover action is normally directed for severe weather, i.e., tornado and extremely high wind conditions.
- c. Shelter-In-Place – Protective action taken when the safest location is inside the building you are in or the nearest building. A shelter-in-place is normally directed to protect personnel from a toxic/hazardous chemical (uranium hexafluoride) release.
- d. Personnel Accountability – Protective action taken to ensure the safety of all personnel that may have been in an affected area. Personnel accountability instructions vary depending on the situation and are found in EP-3-0200-06, Assembly and Personnel Accountability.

3.8 SITE AREA EMERGENCY

3.8.1 An incident that has led or could lead to a significant release to the environment of radioactive or other hazardous material that could require a response by an offsite response organization to protect persons offsite.

3.8.2 A SITE AREA EMERGENCY requires full mobilization of the Emergency Response Organization, and may result in requests for offsite response organizations to respond to the site.

**4. RESPONSIBILITIES**

4.1 Emergency Director

- 4.1.1 Assesses event to determine emergency classification.
- 4.1.2 Determines appropriate protective action recommendations.
- 4.1.3 Makes changes to emergency classification as necessary, including event termination.
- 4.1.4 Ensures emergency notifications are performed.
- 4.1.5 Assumes overall responsibility of plant emergency response.
- 4.1.6 Implements event recovery planning and determines the recovery organization before terminating emergency.

4.2 Incident Commander

- 4.2.1 Establishes command at emergency scene.
- 4.2.2 Provides Shift Manager with event status and on-scene assessment of emergency conditions.

4.3 Shift Manager

- 4.3.1 Ensures immediate protective measures are implemented for onsite/near scene personnel.
- 4.3.2 Ensures incident command is established at the incident scene.
- 4.3.3 Assesses event conditions to determine emergency classification.
- 4.3.4 IF an Emergency Action Level (EAL) is reached or exceeded, THEN assumes responsibility of Emergency Director.

**5. MAIN BODY**

5.1 Discovery of Abnormal Plant Conditions or Activities

- 5.1.1 Plant personnel, visitors, and subcontractors having knowledge of the onset of abnormal plant conditions or activities notify Shift Manager in Control Room.
- 5.1.2 WHEN notified of abnormal plant conditions or activities, THEN the Shift Manager performs the following: [Shift Manager]
  - a. Determines best possible means to limit exposure of personnel to potential or actual threats, such as radioactive or toxic materials that may be accidentally released.
  - b. IF necessary, THEN directs plant personnel, visitors, and subcontractors to take immediate protective actions (example: evacuate or shelter in place).
  - c. IF necessary, THEN directs activation/deployment of the Fire Brigade.

## Classification of Emergency Events

EP-3-0200-01  
Rev. 8  
Level 2 - Reference Use  
Page 7 of 14

- d. IF Fire Brigade is deployed, THEN dispatch Fire Brigade Leader, or designee, to the incident scene as Incident Commander (IC).
- e. Determines the need for and requests offsite emergency assistance as necessary.
- f. Establishes communications with the IC and requests status and on-scene assessment of the event.

### NOTE:

Consider the effect of combinations of events that individually constitute lower classification emergency conditions, but may exceed the criteria for a higher classification emergency condition when they occur concurrently or in sequence.

- g. Assesses event conditions against criteria of Emergency Action Levels (EAL) using Attachment 1, Emergency Action Levels, within 15 minutes of event recognition to determine whether an EAL has been reached.

### NOTE:

If doubt exists as to the classification of an event, and additional information is not immediately forthcoming, always declare the more severe classification.

- h. IF an EAL has been met, THEN declare the event according to Attachment 1, Emergency Action Levels.
- i. IF event does **not** trigger an EAL, THEN continue assessment of event **until** termination of response.

## 5.2 Declaration of ALERT or SITE AREA EMERGENCY

### 5.2.1 Shift Manager performs the following: [Shift Manager]

- a. Until the Emergency Operations Center (EOC) is operational, assumes duties as Emergency Director and initiates EP-3-0200-01-F-1, Emergency Director Turnover Briefing Form.
- b. Records date and time of initial classification of event.
- c. Ensures prompt initial notifications are provided to offsite authorities and the Nuclear Regulatory Commission (NRC) Operations Center according to EP-3-0200-02, Emergency Notification.
- d. Activates the Emergency Response Organization (ERO) according to EP-3-0200-02, Emergency Notification.

### 5.2.2 WHEN the Duty Emergency Director arrives, THEN provide initial briefing on the event using EP-3-0200-01-F-1, Emergency Director Turnover Briefing Form.

**NOTE:**

Transfer of Emergency Director duties from the Shift Manager to the Duty Emergency Director could occur at any point in the "notification-activation-response" process, depending on the progress of Emergency Response Organization staffing. The transfer occurs as soon as practicable, so that the Shift Manager's efforts are concentrated on response to the event.

- 5.2.3 WHEN the EOC is operational, THEN the Shift Manager, as Emergency Director, formally transfers duties of Emergency Director to the Duty Emergency Director.
- 5.2.4 Emergency Director performs the following: [Emergency Director]
- a. Ensures potentially affected persons onsite are notified of appropriate protective actions. (Alerting or notification is accomplished by use of plant PA system, site radios, telephones, or other means of communication.)
  - b. Reviews changes in event conditions against EAL criteria in Attachment 1, Emergency Action Levels.
  - c. IF changing event conditions indicate need for upgrading of event classification, THEN perform the following:
    - 1) IF EOC is operational, THEN consult with Shift Manager on upgrading of event classification.
    - 2) IF determined necessary, THEN upgrade the event classification.
- 5.2.5 IF event classification is upgraded, THEN record date and time of upgrading of event classification and notify offsite authorities and the NRC according to EP-3-0200-02, Emergency Notification.
- 5.2.6 WHEN event no longer meets criteria of Attachment 1, THEN terminate event according to EP-3-0200-07, Recovery and Termination.

**6. DOCUMENTATION AND RECORDS**

- 6.1 All records generated as a result of this procedure will be handled per RM-3-2000-01, Records Management Program.

**7. LICENSE COMMITMENTS AND REQUIREMENTS**

- 7.1 Emergency Plan, Section 2.0, Types of Accidents
- 7.2 Emergency Plan, Section 3.1, Classification System
- 7.3 Emergency Plan, Section 4.2, Onsite Emergency Response Organization
- 7.4 Emergency Plan, Section 7.1, Written Emergency Plan Implementing Procedures

**8. REFERENCES**

8.1 Use References

- 8.1.1 EP-3-0200-02, Emergency Notification
- 8.1.2 EP-3-0200-06, Assembly and Personnel Accountability
- 8.1.3 EP-3-0200-07, Recovery and Termination
- 8.1.4 RM-3-2000-01, Records Management Program

8.2 Source References

- 8.2.1 Emergency Plan

**Procedure Title: Classification of Emergency Events**

**Attachment 1  
Emergency Action Levels  
(Pages 10 to 13)**

EP-3-0200-01  
Rev. 8  
Level 2 - Reference Use  
Page 10 of 14

**Table 1.**

**Buildings/Areas Containing Licensed Material**

Uranium Byproduct Cylinder (UBC) Storage Pad

Cylinder Receipt and Dispatch Building (CRDB)

Separations Building Module (SBM) UF<sub>6</sub> Handling Area

SBM Process Services Corridor (PSC)

SBM Cascade Hall

**Procedure Title: Classification of Emergency Events**

**Attachment 1  
Emergency Action Levels  
(Pages 10 to 13)**

EP-3-0200-01  
Rev. 8  
Level 2 - Reference Use  
Page 11 of 14

**NOTE:**

Use Table 1 above in determining the appropriate emergency classification, as necessary, for the following EALs.

<b>EAL Category</b>	<b>ALERT</b>	<b>SITE AREA EMERGENCY</b>
<b>1.0 Nuclear Criticality</b>		
	1.1A. Discovery of a critical-mass quantity of special nuclear material in an unsafe geometry container or other condition that creates a criticality hazard.	1.1S Confirmed nuclear criticality
<b>2.0 UF<sub>6</sub> Release/ Cylinder Rupture/ Autoclave Failure Event</b>		
	2.1A Any release of UF <sub>6</sub> , not immediately controlled by GEVS, and that cannot be terminated within 15 minutes.	2.1S N/A
	2.2A Catastrophic rupture of a single overheated/liquid 30B cylinder resulting in the instantaneous release of UF <sub>6</sub> .	2.2S Catastrophic rupture of multiple overheated/liquid (>1) 30B cylinders resulting in the instantaneous release of UF <sub>6</sub>
	2.3A N/A	2.3S Catastrophic rupture of a single overheated/liquid 48Y cylinder resulting in the instantaneous release of UF <sub>6</sub>
	2.4A Any puncture, rupture, failure, or breach of an in-service autoclave resulting in a UF <sub>6</sub> release not terminated within 15 minutes	2.4S N/A

**Procedure Title: Classification of Emergency Events**

**Attachment 1  
Emergency Action Levels  
(Pages 10 to 13)**

EP-3-0200-01  
Rev. 8  
Level 2 - Reference Use  
Page 12 of 14

**3.0 Fire Event**

	3.1A Fire occurring in any one <i>Table 1 Building/Area</i> concurrent with a release of UF <sub>6</sub> .	3.1S N/A
	3.2A Fire occurring in any one <i>Table 1 Building/Area</i> not extinguished within 15 minutes.	3.2S Fire occurring in two (2) or more <i>Table 1 Buildings/Areas</i> not extinguished within 15 minutes.
	3.3A Fire directly impinging on a 30B cylinder containing UF <sub>6</sub> which cannot be extinguished within 15 minutes.	3.3S Fire directly impinging on a 48Y cylinder containing UF <sub>6</sub> which cannot be extinguished within 15 minutes.

**4.0 Explosion Event**

	4.1A Any explosion resulting in equipment damage in a <i>Table 1 Building/Area Containing Licensed Material</i> .	4.1S Any explosion resulting in equipment damage in two or more <i>Table 1 Buildings/Areas Containing Licensed Material</i> .
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**5.0 Natural Phenomena Event**

<b>Earthquake</b>	5.1A A vibratory ground motion is felt in the Control Room, recognized as an earthquake, and verified by field personnel	5.1S N/A Note: If earthquake results in a UF <sub>6</sub> release, refer to EALs 2.2S or 2.3S
<b>Tornado</b>	5.2A Tornado on facility site <b>OR</b> Tornado sighted and believed that facility impact is imminent.	5.2S N/A Note: If tornado results in a UF <sub>6</sub> release, refer to EALs 2.2S or 2.3S
<b>High Winds</b>	5.3A Forecast high winds with gusts equal to or greater than 120 mph <b>OR</b> Measured winds with gusts onsite equal to or greater than 108 mph	5.3S N/A
<b>Flooding</b>	5.4A Flooding due to local precipitation in one or more <i>Table 1 Buildings/Areas Containing Licensed Material</i> greater than <b>2 feet deep</b> .	5.4S N/A

<b>Procedure Title: Classification of Emergency Events</b>	
<b>Attachment 1</b> <b>Emergency Action Levels</b> <b>(Pages 10 to 13)</b>	EP-3-0200-01 Rev. 8 Level 2 - Reference Use Page 13 of 14

<b>6.0 Security Event</b>		
	6.1A Security event at the facility requiring entry into security contingency procedures. <b>Note:</b> <i>Hostage-taking, extortion, credible bomb threat, credible threat of violence perpetrated by either an on-site employee(s) or an outside intruder(s) who is deemed to be armed and dangerous.</i>	6.1S Security event with an imminent or actual loss of physical control of one or more <i>Table 1 Buildings/Areas Containing Licensed Material</i> . <b>Example:</b> <i>Terrorist or armed personnel takeover of a facility or armed assault within the facility area.</i>
	6.2A A direct significant credible security threat communicated by local, state, or federal law enforcement agencies. <b>Note:</b> <i>Other threat information will need to be assessed by Security Management to determine credibility.</i>	6.2S N/A

<b>7.0 Discretionary Classification</b>		
	7.1A Other adverse event occurring in any one <i>Table 1 Building/Area</i> , potentially or actually, that may result in a radiological or non-radiological hazardous materials release which has the potential for onsite protective actions  <b>BUT DOES NOT</b>  Require any response measures to protect the general public offsite.	7.1S Other adverse event occurring onsite, potentially or actually, that may result in a radiological or non-radiological hazardous materials release which has the potential for offsite consequences requiring both onsite and offsite protective actions.

**Procedure Title: Classification of Emergency Events**

**EP-3-0200-01-F-1**

**Emergency Director Turnover Briefing Form  
(Pages 14 to 14)**

**EP-3-0200-01**

**Rev. 8  
Level 2 - Reference Use  
Page 14 of 14**

**Event Information**

**Event Type:**  Emergency  Drill/Exercise

**Briefing Date:** **Position:**  Shift Manager  EOC Emergency Director

**Briefing Time:** **Incident Location:**

**Emergency Categorization and Classification**

<b>Classification Status</b>	Official Date:	Official Time:	Hours (Local)
	<input type="checkbox"/> Initial Classification <input type="checkbox"/> Reclassification <input type="checkbox"/> Significant Change <input type="checkbox"/> Termination		
	<input type="checkbox"/> Emergency Not Requiring Classification		EAL No.
	<input type="checkbox"/> Alert	<input type="checkbox"/> Site Area Emergency	

**Incident Summary**

<b>Incident Description</b>	<b>Details:</b>

<b>Incident Status</b>	<input type="checkbox"/> Unknown	<input type="checkbox"/> Stable	<input type="checkbox"/> Escalating	<input type="checkbox"/> Improving
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<b>Incident Type</b> (check all that apply)	<input type="checkbox"/> Radiological	<input type="checkbox"/> Chemical	<input type="checkbox"/> Fire	<input type="checkbox"/> Security/Law Enforcement
	<input type="checkbox"/> Natural	<input type="checkbox"/> Explosion	<input type="checkbox"/> Criticality	<input type="checkbox"/> Other:

<b>Injuries</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Unknown
	<b>Status:</b>		

<b>Mutual Aid Requested</b>	<input type="checkbox"/> EMS	<input type="checkbox"/> Fire	<input type="checkbox"/> HAZMAT	<input type="checkbox"/> Law Enforcement
	<b>Details:</b>			

<b>Notifications Competed</b>	<input type="checkbox"/> State/Locals	<input type="checkbox"/> NRC	<input type="checkbox"/> Neighbors
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<b>Release Status</b>	Release in Progress: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
	<b>Release Information:</b>

<b>Met Data</b>	Wind Direction From (degrees):	Wind Speed (mph):
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**Protective Actions / Protective Action Recommendations**

<b>ONSITE Protective Actions</b>	<input type="checkbox"/> N/A	<input type="checkbox"/> Shelter-In-Place	<input type="checkbox"/> Evacuation	<input type="checkbox"/> Self-Barricade
	<b>Description:</b>			

<b>OFFSITE Protective Action Recommendations</b>	<input type="checkbox"/> N/A	<input type="checkbox"/> Shelter-In-Place	<input type="checkbox"/> Evacuation	<input type="checkbox"/> Other:
	<b>Description:</b>			

<b>Set Number:</b>	CS-631
<b>Set ID:</b>	12140
<b>Set Type:</b>	Controlled Sets
<b>Copy Holder:</b>	Licensing,
<b>Print Location:</b>	TSB-DC
<b>Description:</b>	NRC-Emergency Response Center Region II
<b>Comments:</b>	NRC off-site set - contact: Veronica.Romero@urenc.com
<b>Work Planning Number:</b>	
<b>Other (1):</b>	Procedure Set
<b>Other (2):</b>	
<b>Set Status:</b>	Open

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Document Number	Change	Reason for Issue	Rev	Rev Date	# of Copies	Change Date
EP-3-0200-01	UPDATE	N/A	8.0	December 19, 2018 12:00:00 AM MST	1	Dec 19, 2018

**Index of Current Documents**

Document Number	Title	Reason for Issue	ECR	# of Copies	Rev	Rev Date
Emergency Plan	Emergency Plan			1	25.1	July 10, 2017 12:00:00 AM MDT
EP-3-0200-01	Classification of Emergency Events	N/A		1	8.0	December 19, 2018 12:00:00 AM MST
EP-3-0200-02	Emergency Notification	N/A		1	22.0	November 19, 2018 8:33:00 AM MST
EP-3-0200-04	Environmental Monitoring and Sampling	N/A		1	6.0	July 7, 2016 12:00:00 AM MDT
EP-3-0200-06	Assembly and Personnel Accountability	N/A		1	9.0	February 14, 2017 10:00:00 AM MST
EP-3-0200-07	Recovery and Termination	N/A		1	4.0	February 14, 2017 12:00:00 AM MST
EP-3-0200-10	Criticality Emergency Response	N/A		1	3.0	September 24, 2015 12:00:00 AM MDT
EP-3-0200-11	Emergency Operations Center Operations	N/A		1	7.0	November 21, 2017 11:03:00 AM MST