Callaway Plant Past Office Box 620 Fulton, Missouri 65251

April 21, 1994

Document Control Desk Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Mail Stop P1-137 Washington, DC 20555

ULNRC-2998

Gentlemen:

DOCKET 50-483 CALLAWAY PLANT NUMARC/NESP-007 EAL SUBMITTAL REQUEST FOR ADDITIONAL INFORMATION

You will find attached one (1) copy of our response to your **Request for Additional Information (RAI)** associated with our submittal. Your RAI was transmitted to us in your letter TAC M88479 dated April 7, 1994.

If you have any questions regarding these responses please call me at (314) 676-8212 or Mr. Mark Hicks at (314) 676-8705.

Very Truly Yours,

Milton A. Stiller

Manager, Nuclear Safety and Emergency Preparedness

Main MWH alr Enclosure

cc: J. B. O'Brien, EP Specialist, U.S. Nuclear Regulatory Commission, w/a

L. R. Wharton, Licensing Project Manager, Callaway Plant, w/a

J. B. Martin, USNRC Regional Administrator, Region III, w/a

B. A. Bartlett, USNRC Resident Inspector, Callaway Plant, w/a

L. R. Greger, USNRC Region III - Chief, Reactor Projects Section III A, w/a Manager, Electric Department, Missouri Public Service Commission, w/a Shaw, Pittman, Potts & Trowbridge, w/a

9404270166 94042 ADOCK 05000483 PDR

RESPONSE TO TO REQUEST FOR ADDITIONAL INFORMATION (RAI)

DOCKET 50-483

UNION ELECTRIC CALLAWAY PLANT

TABLE OF CONTENTS

l	NUMARC EALs - Attachment 1 of EIP-ZZ-00101
2.	EAL Bases
3.	Responses to the Request for Additional Information
4.	Changes to Callaway's EAL Submittal
5.	Enclosure 1 - EDP-ZZ-00005
5.	Enclosure 2 - Critical Safety Function Status Trees
7.	Enclosure 3 - Radiological Consequences of a Waste Gas Decay Tank Rupture
8.	Enclosure 4 - Technical Bases for P.C. Based Plume Phase Dose Assessment
)	Enclosure 5 - EIP-ZZ-00101 Examples of Emergency Coordinator Judgment
10.	Enclosure 6 - FSAR Site Addendum - 3.5.2
11.	Enclosure 7 - OTO-RK-00001, Loss of Control Room Alarms

EIP-ZZ-00101 Rev. 16

Group 1 ABNORMAL RADIATION EVENTS Offsite Events

1

UNUSUAL EVENT	ALERT	SITE EMERGENCY	GENERAL EMERGENCY
A.	B.	C.	D.
Any Unplanned Release of	Any Unplanned Release of	EAB Dose Resulting From an Actual or	EAB Dose Resulting From an Actual or
Radioactivity to the Environment That	Radioactivity to the Environment That	Imminent Release of Gaseous Radioactivity	Imminent Release of Gaseous Radioactivity
Exceeds 2 Times the Radiological	Exceeds 200 Times the Radiological	Exceeds 100 mrem TEDE or 500 mrem	Exceeds 1000 mrem TEDE or 5000 mrem
Effluent Control Limits in the ODCM,	Effluent Control Limits in the ODCM,	CDE Thyroid for the Actual or Projected	CDE Thyroid for the Actual or Projected
(APA-ZZ-01003) for ≥60 minutes.	(APA-ZZ-01003) for ≥15 minutes.	Duration of the Release.	Duration of the Release.
MODES: At All Times	MODES: At All Times	MODES: At All Times	MODES: At All Times
Indicators 1. All of the following: a. A valid alarm and reading on any effluent monitor: HB-RE-18 (Channel 186) GT-RE-21B (Channel 213) GH-RE-10B (Channel 103) b. The valid reading is 2 times the Hi Hi alarm setpoint (trip setpoint) value. c. The release cannot be terminated within 60 minutes of the alarm actuation. OR 2. Both of the following: a. Confirmed sample analysis indicates that a release exceeding 2 times the arreliable wal, we of the arreliable wal, we arreliable wal,	Indicators 1. <u>All</u> of the following: a. A valid alarm and reading on any effluent monitor: HB-RE-18 (Channel 186) GT-RE-21B (Channel 186) GT-RE-21B (Channel 213) GH-RE-10B (Channel 103) b. The valid reading is 200 times the Hi Hi alarm setpoint (trip setpoint) value. c. The release cannot be terminated within 15 minutes of the alarm actuation. OR 2. <u>Both</u> of the following: a. Confirmed sample analysis indicates that a release exceeding 200 times the amplicable values of the	 Indicators <u>Any</u> of the following: *1. A valid reading on the Unit Vent monitor, GT-RE-21B (Channel 213) > 8.1E+5 μCi/sec for 15 minutes. 2. A valid dose projection indicates >100 mrem TEDE or >500 mrem CDE thyroid dose at the EXCLUSION AREA BGUNDARY using inplant rad data or field monitoring team survey results. 3. Field survey results at the EAB corresponding to > 100 mrem/hr TEDE for 1 hour (or expected to continue for 1 hour) or > 500 mrem/hr CDE thyroid for 1 hour of inhalation. 	 Indicators Any of the following: *1. A valid reading on the Unit Vent monitor GT-RE-21B (Channel 213) > 8.1E+6 μCi/sec for 15 minutes. 2. A valid dose projection indicates >1000 mrem TEDE or >5000 mrem CDE thyroid dose at the EXCLUSION AREA BOUNDARY using inplant rad data or field monitoring team survey results. 3. Field survey results at the EAB corresponding to > 1,000 mrem/hr TEDE for 1 hour (or expected to continue for 1 hour) or > 5,000 mrem/hr CDE thyroid for 1 hour of inhalation.
ODCM (APA-ZZ-01003), has	ODCM (APA-ZZ-01003), has	*Declare the event using this indicator	*Declare the event using this indicator
occurred.	occurred.	only if an actual dose assessment per	only if an actual dose assessment per
b. The release cannot be	b. The release cannot be	Indicator 2 cannot be performed in 15	Indicator 2 cannot be performed in 15
terminated within 60 minutes.	terminated within 15 minutes.	minutes.	minutes

Group 1 ABNORMAL RADIATION EVENTS Onsite Events

UNUSUAL EVENT			ALERT		ALERT	
E. ⁴ An M(Unexpected Increase in Plant Radiation. DDES: At All Times licators v of the following:	F.* Maj Tha Fue MO Ind	or Damage to Irradiated Fuel or Loss of Water Level t Has or Will Result in the Uncovering of Irradiated I Outside the Reactor Vessel. DES: At All Times icators	G.* Release of Rad Material, or an Increase in Rad Level that <u>Either</u> Impedes Safe Operations or the Ability to Establish or Maintain Cold Shutdown. MODES: At All Times Indicators Any of the following:		
1. 2. 3.	Spent Fuel Pool level is decreasing on EC-LI-0039A with Normal makeup being added, and all irradiated fuel assemblies remain covered. Refueling Pool level is decreasing on BB-LI-0053A or B with Normal makeup being added, and all irradiated fuel assemblies remain covered. Any valid (Confirmed by HP survey) ARM (other than a Group 1,G. Safe Shutdown ARM) >1000 times normal. (Normal levels can be considered as the monitor reading prior to the noticed increase.)	1. 2. 3. 4.	A VALID Hi-Hi Alarm on Fuel Building exhaust monitors GG-RE-27 or 28 (Channel 273 or 283) of 1.46 E-3 µCi/cc. Containment refueling bridge area radiation monitor (SD-41) ≥ 150 mu/hr. Fuel building area radiation monitor (SD-37 or 38) > 70 mr/hr. Report of visual observation of loss of water level resulting in irradiated fuel being uncovered.	1.	Valid (confirmed by HP) reading on SD-33 (Control Room) >15 mr/hr. Valid (confirmed by HP) reading on the following Safe Shutdown Area ARMs: SD-26 PC Changeout Area SD-23 RHR Hx Area Corr. SD-15 Door to HPACA Area SD-16 Fire Brigade Locker Area > 1000 times normal (normal levels can be considered as the monitor reading prior to the noticed increase).	
*	This Initiating Condition is not meant to apply to anticipated temporary increases due to planned events (e.g., incore detector movement, radwaste container movement, depleted resin transfers, upper internal movements, etc.)	*	This Initiating Condition is not meant to apply to anticipated temporary increases due to planned events (e.g., incore detector movement, radwaste container movement, depleted resin transfers, upper internal movements, etc.)	*	This Initiating Condition is not meant to apply to anticipated temporary increases due to planned events (e.g., incore detector movement, radwaste container movement, depleted resin transfers, upper internal movements, etc.)	

ATTACHMENT 1

EIP-ZZ-00101 Rev. 16

Group 2 FISSION PRODUCT BARRIERS

A. <u>UNUSUAL EVENT</u>	B. <u>ALERT</u>	C. <u>SITE EMERGENCY</u>	D. <u>SITE EMERGENCY</u>	E. GENERAL EMERGENCY
Any CONTAINMENT BARRIER Indicator	Any RCS BARRIER Indicator OF Any FUEL CLAD BARRIER Indicator	Any FUEL CLAD BARRIER Indicator and Any RCS BARRIER Indicator	A CTMT BARRIER Loss Indicator and Any RCS or FUEL CLAD BARRIER Indicator	A <u>Loss</u> Indicator from any two barriers <u>and</u> .' <u>.nv</u> Indicator from the third

CONTAINMENT BARRIER	RCS BARRIER	FUEL CLAD BARRIER
MODES, 14	MUDES 14	MODES: 1-4
 Loss indicators: <u>Containment Pressure</u> 	Loss indicators: 1. RCS Leak Rate Safety Injection initiated with a loss of subcooling (less than instrument error) using Attachment 2 or 3 of Emerg. Procedure E-0. 2. SG Tube Rupture a) Any of the following: 1) GE-RE-92 (Channel 925) >2.0E-5 µCi/cc 2) BM-RE-25 (Channel 256) >1.0E-4 µCi/cc 3) SJ-RE-02 (Channel 026) >1.0E-4 µCi/cc 4) Narrow range level in any SG continues to increase in an uncontrolled manner and b) either of the following: 1) The ruptured SG pressure is decreasing in an uncontrolled manner or completely depressurized. 2) Manual usc of the ruptured SG PORV for cool down. 3 Containment Radiation Monitoring GT_RE-59(60 (Channels 591/601) reading >1 E+3 R/r	 <u>Loss indicators:</u> <u>Critical Safety Function Status</u> Meet the entry requirements for FRC 1, Red Path for Core cooling. <u>Primary Coolant Activity Level</u> RCS coolant activity >300µCi/cc dose equivalent I-131. <u>Containment Radiation Monitoring</u> GT-RE-59/60 (Channels 591/601) reading >3 E+3 R/hr. <u>Potential Loss indicator:</u> <u>Critical Safety Function Status</u> Meet the entry requirements for FRC 2, Orange Path for Core Cooling <u>or</u> FRH 1, Red Path for Heat Sink.
 2) Manual use of the leaking SG FORV for Cost down. <u>Potential Loss indicators:</u> <u>Critical Safety Function Status</u> Meet the entry requirements for FRZ.1, Red Path Summary for CTMT. <u>Containment Pressure</u> H2 concentration in containment >4%. <u>B</u> Less than 1 full train of Ctrnt spray and Ctrnt cooling fans, with Ctrnt pressure greater than 27 psig. <u>Significant Radioactive Inventory in Ctrnt</u> GT-RE-59/60 (Channels 591/601) reading >15 E+3 R/hr <u>Core Exit Thermocouples</u> Core exit TCs >1200°F and restoration procedures not effective in 15 minutes. 	 Potential Loss indicators: 4 Critical Safety Function Status Meet the entry requirement for FRH 1, Red Path Heat Sink or FRP 1, Red Path for Integrity. 5. <u>RCS Leak Rate</u> RCS leakage >50 gpm. 6. <u>SG Tube Rupture</u> a) <u>Any</u> of the following: 1) GE-RE-92 (Channel 925) >2.0 E-5 µCi/cc 2) BM-RE-25 (Channel 256) >1.0 E-4 µCi/cc 3) SJ-RE-0° (Channel 026) >1.0 E-4 µCi/cc 4) Narrow range level in any SG continues to increase in an uncontrolled manner. and b) the primary-to-secondary leak rate exceeds 50 gpm. 	 5. Core East Thermocouples Core exit TCs >700°F. 6. Reactor Vessel Water Level a) RVLIS (Pumps Off) less than 40% OF b) RVLIS (Pumps On) less than minimum <u>RCP's on Minimum</u> <u>RCP's on Minimum</u> <u>ATTACHMENT 1</u>

EIP-ZZ-00101 Rev. 16

EIP-ZZ-00101 Rev. 16

Group 3 HAZARDS AFFECTING PLANT SAFETY Security Events

UNUSUAL EVENT	ALERT	SITE EMERGENCY	GENERAL EMERGENCY
A. Confirmed Security Event Which Indicates a Potential Degradation in the Level of Safety of the Plant. MODES: At All Times Indicators Any of the following: 1. Bomb device discovered within the plant Protected Area and outside the following Safe Shutdown Areas: a. Area 5 b. Containment c. Aux Feed Pump Rooms d. Aux Ruilding e. Diesel Generator Building f. UHS Cooling Tower g. ESW Pumphouse h. Control Building i. RWST j. Fuel Building 2. Confirmed report from the Shift Security Supervisor of an attempted entry, sabotage or security threat that cannot be properly compensated for within 10 minutes.	B. Security Event in the Plant Protected Area. MODES: At All Times Indicators Confirmed report by the Shift Security Supervisor of an intrusion by a hostile force into the plant Protected Area.	C. Security Event in a Safe Shutdown Area. MODES: At All Times Indicators Any of the following 1. Bomb device discovered within any of the following areas: a. Area 5 b. Containment c. Aux Feed Pump Rooms d. Aux Building e. Diesel Generator Building f. UHS Cooling Tower g. ESW Pumphouse h. Control Building i. RWST j. Fuel Building i. RWST j. Fuel Building 2. Confirmed report from the Shift Security Supervisor of an intrusion by a hostile force into any of the following areas: a. Area 5 b. Containment c. Aux Feed Pump Rooms d. Aux Building e. Diesel Generator Building f. UHS Coo. 1g Tower	D. Security Event Resulting in a Loss of the Ability to Reach and Maintain Cold Shutdown. MODES: At All Times Indicators Any of the following: 1. Occupation of the Control Room by a hostile force. 2. Occupation of the Aux Shutdown Panel by a hostile force.
		h. Control Building i. RWST j. Fuel Building	

ATTACHMENT 1

Group 3 HAZARDS AFFECTING PLANT SAFETY

1	IFES	Natural Events			
UNUSUAL EVENT	ALERT	UNUSUAL EVENT	ALERT		
E Fire Within Protected Area Boundary Not Extinguished Within 15 Minutes of Verification. <u>MODES: At All Times</u> <u>Indicators</u> 1. Fire in or <u>adjacent</u> to <u>any</u> of the following: a. Area 5 b. Containment c. Aux Feed Pump Rooms d. Aux Building e. Diesel Generator Building f. UHS Cooling Tower g. ESW Pumphouse h. Control Building i. RWST j. Fuel Building and 2. Not extinguished within 15 minutes of control room verification of a fire.	F Fire Affecting the Operability of Plant Safety Systems Required to Establish or Maintain Safe Shutdown. MODES At All Times Indicators 1 Fire in any of the following areas: a Area 5 b Containment c Aux Feed Pump Rooms d Aux Building b Diesel Generator Building d Diesel Generator B	 G Natural and Destructive Phenomena Affecting the Protected Area. MODES: At All Times Modes: At All Times Modes: At All Times Modes: At All Times May of the following: a. Response spectrum recorder operating annunciator 98E alarms in the Control Room and b. Verified to be a real event per OTO-SG-00001. C. Report of a turbine rotating component failure resulting in casing penetration or major damage to seals causing a rapid loss of lubricating oil or hydrogen. S. Explosion, vehicle crash or tornado in er adjacent to any of the following: a. Area 5 b. Containment c. Aux Feed Pump Rooms d. Aux Building e. Diesel Generator Building f. UHS Cooling Tower g. ESW Pumphouse h. Control Building i. RWST j. Fuel Building 	 H. Natural and Destructive Phenomena Affecting a Safe Shutdown Area. MODES At All Times Indicators Any of the following: a. Operating basis earthquake annunciator 98D alarms in the Control Room and b. Earthquake greater than OBE levels (0.12g) in the horizontal and vertical directions as indicated by LIGHT "OSG-AE-1" or LIGHT "OSG-AE-2" a. Report of a tornado, high wind, vehicle crash, explosion, or other natural or destructive phenomena to any of the following Safe Shutdown areas: Area 5 Containment Aux Feed Pump Rooms Aux Building Diesel Generator Building UHS Cooling Tower ESW Pumphouse Control Building RWST Fuel Building and There is visible damage to permanent structures or equipment, affecting plant operations 		

3

ATTACHMENT 1

EIP-ZZ-00101 Rev. 16

Group 3 HAZARDS AFFECTING PLANT SAFETY Toxic Gas

UNUSUAL EVENT	ALERT	ALERT	SITE EMERGENCY		
L Release of Toxic or Flammable Gases Deemed Detrimental to Safe Operation of the Plant.	J. Release of Toxic or Flammable Gases Within a Facility Structure Which Jeopardizes Operation of Systems Required to Establish or Maintain Cold Shutdown.	K. Control Room Evacuation Has Been Initiated.	L. Control Room Evacuation Has Been Initiated and Plant Control Cannot Be Established.		
MODES: At All Times	MODES At All Times	MODES: At All Times	MODES At All Times		
 Indicators Any of the following: Report or detection of toxic or flammable gases that enter within the Exclusion Area Boundary, that have created a HAZARDOUS ATMOSPHERE per CTP-ZZ-01200. Confirmed report by local, County or State Officials of potential evacuation of site personnel as determined from the DOT evacuation tables for selected hazardous materials in the DOT Emergency Response Guide for Hazardous Materials. 	Indicators Any of the following: 1. Report or detection of toxic or flammable gases, not properly contained, within or adjacent to any of the following Safe Shutdown Areas, that have created a HAZARDOUS ATMOSPHERE per CTP-ZZ-01200. a. Area 5 b. Containment c Aux Feed Pump Rooms d. Aux Building e Diesel Generator Building f. UHS Cooling Tower g ESW Pumphouse h. Control Building i. RWST j. Fuel Building	Indicators Entry into OTO-ZZ-00001, Control Room evacuation is required.	 <u>Indicators</u> Entry into OTO-ZZ-00001, Control Room evacuation is required. <u>and</u> Control of the Aux Feed System and a SG PORV for cooldown cannot be established within 15 minutes. 		

EIP-22-00101 Rev. 16

Group 4 SYSTEM MALFUNCTIONS Annunciator Events

6 1 1

-

UNUSUAL EVENT	ALERT	SITE EMERGENCY	
A. Unplanned Loss of Most or All Alarms (Annunciators) for Greater Than 15 Minutes. MODES: 1-4 <u>Indicators</u> 1. <u>Either</u> of the following:	B. Unplanned Loss of All Annunciators With Either a Transient In Progress, or the Plant Computer is Unavailable. MODES: 1-4 <u>Indicators</u> 1. <u>Either</u> of the following:	C. Inability to Monitor a Significant Transient in Progress. MODES: 1-4 <u>Indicators</u> <u>All</u> of the following:	
 a. 3 of 4 field power supplies have failed for greater than 15 minutes (loss of all annunciators) and not a result of planned action. b. All thirteen logic power supplies have failed for greater than 15 minutes (loss of all annunciators) and not a result of planned action. OF <u>All</u> of the following: c. Any combination of power supplies (including Optical Isolators) have failed for greater than 15 minutes. d. Any fail-d power supply's <u>minimum compensatory actions</u>, per OTO-RK-00001, cannot be maintained. e. The loss does not result from planned action. 	 a. 3 of 4 held power supplies have failed for greater than 15 minutes (loss of all annunciators) and not a result of planned action. b. All thirteen logic power supplies have failed for greater than 15 minutes (loss of all annunciators) and not a result of planned action. Or <u>All</u> of the following: c. Any combination of power supplies (including Optical Isolators) have failed for greater than 15 minutes. d. Any failed power supply's <u>minimum</u> compensatory actions, per OTO-RK-00001, cannot be maintained. e. The loss does not result from planned action. <u>and</u> 2. <u>Any</u> of the following: a. A change in reactor power greater than ± 10%. b. Safety injection initiation, c. The plant computer is unavailable. 	 a. <u>Either</u> of the following: 3 of 4 field power supplies have failed (loss of all annunciators). All thirteen logic power supplies have failed (loss of all annunciators). <u>Or</u> <u>Both</u> of the following: Any combination of power supplies (including Optical Isolators) have failed. Any failed power supply's <u>minimum compensatory actions</u>, per OTO-RK-00001, cannot be maintained. <u>Either</u> of the following:	

ATTACHMENT 1

EIP-ZZ-00101 Rev. 16

EIP-ZZ-00101 Rev. 16

-

EMERGENCY ACTION LEVELS

Group 4 SYSTEM MALFUNCTIONS

	Ele	ctrical Events (Operat	ing)		Electrical Events (Shutdown)	
UNUSUAL EVENT	ALERT	SITE EMERGENCY	SITE EMERGENCY	GENERAL EMERGENCY	UNUSUAL EVENT	ALERT
D. Loss of All Offsite Power to Essential Busses for Greater Than 15 Minutes.	E. Only One AC Source to Essential Busses for >15 Minutes Such That Any Additional Single Failure Would Result in Station Blackout. MODES: 1-4	F. Loss of All Offsite Power and Loss of All Onsite AC Power to Essential Busses	G. Loss of All Vital DC Power MODES: 1-4	H. Prolonged Loss of All Offsite Power and Prolonged Loss of All Onsite AC Power.	I. Loss of Required DC Power During Cold Shutdown or Refueling Mode for Greater Than 15 Minutes. MODES: 5, 6	J. Loss of All Offsite Power and Loss of All Onsite AC Power to Essential Busses During Cold Shutdown or Refueling. MODES: 5, 6, Defueled
 Indicators All of the following: Loss of offsite power to NB01 and NB02. NB01 and NB02 being supplied by NE01 and NE02. The loss of offsite power has occurred for >15 minutes. 	Indicators 1. Loss of any 3 of the following power sources: a. Offsite power to NB01 b. Offsite power to NB02 c. Emergency Diesel NE01 d. Emergency Diesel NE02 and 2. The loss of all 3 has occurred for >15 minutes.	Indicators 1. Loss of <u>all</u> 4 of the following power sources: a. Offsite power to NB01 b. Offsite power to NB02 c. Emergency Diesel NEP1 d. Emergency Diesel NE02 and 2. The loss of <u>all</u> 4 has occurred for >15 minutes.	 Indicators Loss of all vital DC power as indicated by less than 106.9 VDC on vital DC busses NK01, NK02, NK03, and NK04. and Failure to restore power to at least one DC bus within 15 minutes. 	Indicators All of the following: 1. Loss of offsite power to NB01 and NB02. 2. Loss of both Emergency Diesel Generators NE01 and NE02. 3. a. 3. a. and NE02. 3. a. Restoration of at least one emergency bus within 4 hours is not likely. or b. b. Meet the entry requirements for FRC.1, Red Path for Core Cooling.	Indicators 1. No operable (Division 1 or 2) Vital DC power source as indicated by < 106.9 VDC on	 Indicators Loss of <u>all</u> 4 of the following power sources: a. Offsite power to NB01 b. Offsite power to NB02 c. Emergency Diesel NE01 d. Emergency Diesel NE02 and The loss of <u>all</u> 4 has occurred for >15 minutes.

EIP-ZZ-00101 Rev. 16

.

EMERGENCY ACTION LEVELS

Group 4 SYSTEM MALFUNCTIONS

17 F		PR	
S 35 3 5 7	1 C 1 C 1 C 1 C 1	5 15 WD (D) 2 b 1	1.0.0.0.
	12299782	 20 0 0 20 0 0 1 	

UNUSUAL EVENT ALERT		SITE EMERGENCY	SITE EMERGENCY
K.* Inability to Perform a Required Shutdown Within Technical Specification Limits. MODES: 1-4 Indicators 1. The plant is not brought to a required operating mode within a Technical Specification LCO action statement time.	 L. Inability to Maintain Plant in Cold Shutdown. MOLES: 5.6 <u>Indicators</u> Any of the following: Complete loss of both trains of RHR Complete loss of both trains of CCW. Complete loss of both trains of ESW. <u>2 Either of the following:</u> Greater than 200°F on <u>any</u> valid incore thermocouple.* Uncontrolled temperature rise, with no actions available that will likely prevent approaching 200°F on <u>any</u> valid incore thermocouple.* 	M Loss of Water Level That Has or Will Uncover Fuel in the Reactor Vessel. MODES: 5, 6 <u>Indicators</u> 1. <u>Any</u> of the following: a. Complete loss of both trains of RHR. b. Complete loss of both trains of CCW. c. Complete loss of both trains of ESW. <u>and</u> 2. <u>Either</u> of the following: a. Greater than 200°F on <u>any</u> valid incore thermocouple.* b. Uncontrolled temperature rise, with no actions available that will likely prevent approaching 200°F on <u>any</u> valid incore thermocouple.* <u>and</u> 3. a. Water level in the reactor vessel is less than 2.0 inches on BB-LI-0053A or B. <u>Or</u> b. RVLIS (numps off) <55%	 N. Complete Loss of Function Needed to Achieve or Maintain Hot Shutdown. MODES: 1-4 Indicators All of the following: Failure to bring the reactor subcritical with the control rods fully inserted. Complete loss of all Boron Injection Flowpaths. Of All of the following: All steam generator levels <10% wide range. All steam dump valves to condenser (AB-UV-34, 35, and 36) are NOT responding to steam header pressure controller (AB-ZI-34, 35, or 36). All steam generator steam dump valves to atmosphere are NOT operating properly (AB-PIC-1A, 2A, 3A and 4A).
* It is not intended to declare an Unusual Event due to an unknown condition or failure resulting in exceeding the allowable action statement time. The allowable action statement time is always available from the time of the discovery.	 If a thermocouple is not available, use Wide Range Hot Leg temperature indications: BBTI413A - Loop 1 BBTI423A - Loop 2 RECORDERS BBTR413 - Loop 1 BBTR423 - Loop 2 BBTR433 - Loop 3 BBTR443 - Loop 4 	 If a thermocouple is not available, use Wide Range Hot Leg temperature indications: BBTI413A - Loop 1 BBTI423A - Loop 2 RECORDERS BBTR413 - Loop 1 BBTR423 - Loop 2 BBTR433 - Loop 3 BBTR443 - Loop 4 	or 3. <u>All</u> of the following: a. The Ultimate Heat Sink (UHS) is inoperable as a result of level or temperature b. Complete loss of both UHS Cooling Tower trains.

Page 9 of 10

ATTACHMENT 1

Group 4 SYSTEM MALFUNCTIONS

a. . . .

1

Communication Events	RCS/Fuel Events		Reactor Protection System		
UNUSUAL EVENT	UNUSUAL EVENT	UNUSUAL EVENT	ALERT	SITE EMERGENCY	<u>GENERAL</u> <u>EMERGENCY</u>
O. Unplanned Loss of All Onsite or Offsite Communication Capabilities MODES: 1-6 Indicators I All of the following	P. Fuel Clad Degradation MODES: 1-6 <u>Indicators</u> 1. <u>Any</u> of the following:	Q. RCS Leakage MODES: 1-4 Indicators 1. Any of the	R. Failure of Reactor Protection System Instrumentation to Complete or Initiate an Automatic Reactor Trip Once a Reactor Protection System Setpoint Has Been Exceeded and Manual Trip Was Successful. MODES: 1, 2 Indicators 1. Failure of	S. Failure of Reactor Protection System Instrumentation to Complete or Initiate an Automatic Reactor Trip Once a Reactor Protection System Setpoint Has Been Exceeded and Manual Trip Was <u>NOT</u> Successful. <u>MODES: 1, 2</u> <u>Indicators</u> 1. Failure of	T. Failure of the Reactor Protection System to Complete an Automatic Trip and Manual Trip Was <u>NOT</u> Successful and There Is Indication of an Extreme Challenge to the Ability to Cool the Core. <u>MODES: 1, 2</u> <u>Indicators</u> All of the following:
 a. Complete failure of Plant telephone systems b. Complete failur of Paging systems c. Complete failure of Plant radios d. Complete failure of Plant Emergency Dedicated Phones. or 2. <u>All</u> of the following: a. Complete failure of ENS (Red Phone) line b. Complete failure of Notification and Coordination line (Blue Phone) c. Complete failure of Touch-tone telephone system (EPABX) d. Complete failure of the Sheriff's radio system. 	 a. >1.0 μCi/gram Dose Equivalent I-131 for greater than a 48 hour continuous period. b. Dose Equivalent I-131 activity exceeding the limits of Tech Spec Fig. 3.4-1. c. >100/E bar μCi/gram of gross radioactivity. 	following: a. Unidentified leakage greater than 10 gpm. b. Pressure boundary leakage greater than 10 gpm. c. Identified leakage greater than 25 gpm.	reactor protection system instrumentation to initiate an automatic trip. <u>and</u> 2. Manual reactor trip is successful using either manual trip switch, SB-HS-1 on RL003 <u>or</u> SB-HS-42 on RL006.	reactor protection system instrumentation to initiate an automatic trip. <u>and</u> 2. Manual reactor trip is <u>NOT</u> successful using manual trip switches SB-HS-1 on RL003 <u>and</u> SB-HS-42 on RLG06.	 Failure of reactor protection system instrumentation to initiate an automatic trip. Manual reactor trip is <u>NOT</u> successful using manual trip switches SB-HS-1 on RL003 <u>and</u> SB-HS-42 on RL006. Meet the entry requirements for FRC.1 <u>or</u> FRH.1, red path summaries for core cooling and heat sink.

ATTACHMENT 1

EIP-ZZ-00101 Rev. 16