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TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

TRANSMITTAL: LISTED BELOW ARE NEW/REVISED PROCEDURES WHICH MUST BE IMMEDIATELY INSERTED INTO OR DISCARDED FROM YOUR PROCEDURE MANUAL.

Action Required	Section or Description
REMOVE AND DESTROY	EI-1, R/37, ENTIRE PROCEDURE
REPLACE WITH	EI-1, R/38, ENTIRE PROCEDURE

SIGN, DATE, AND RETURN THE ACKNOWLEDGEMENT FORM WITHIN 10 DAYS TO THE PALISADES PLANT DOCUMENT CONTROL.

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DATE

A045

EMERGENCY IMPLEMENTING PROCEDURE

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

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PALISADES NUCLEAR PLANT
EMERGENCY IMPLEMENTING PROCEDURE

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TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

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ATTACHMENTS

Attachment 1, "Site Emergency Plan Classification"
Attachment 2, "Emergency Actions/Notifications"

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USER ALERT

REFERENCE USE PROCEDURE

Refer to the procedure periodically to confirm that all procedure segments of an activity will be or are being performed. Where required, sign appropriate sign-off blanks to certify that all segments are complete.

1.0 PERSONNEL RESPONSIBILITIES

- 1.1 The Shift Supervisor shall implement this procedure and assume the title and responsibilities of the Site Emergency Director (SED) until relieved by Plant Management identified below.

Responsibilities of the Site Emergency Director can be found in Emergency Implementing Procedure EI-2.1, "Site Emergency Director."

- 1.2 The normal line of succession for the SED shall conform to the individuals as listed in the Delegation of Responsibility memo published by the Plant General Manager. The succession of Delegation of Responsibility is required by Technical Specifications ADMIN 5.1.1.

For backshifts or weekends, the Duty and Call Superintendent assumes the role of the Plant General Manager.

2.0 PURPOSE

To classify those emergency conditions that necessitate the activation to the Site Emergency Plan. To identify actions that should be taken to mitigate the consequences of an emergency.

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3.0 REFERENCES

3.1 **SOURCE DOCUMENTS**

- 3.1.1 Emergency Operating Procedure EOP-2.0, "Reactor Trip Recovery"
- 3.1.2 Emergency Operating Procedure EOP-3.0, "Station Blackout Recovery"
- 3.1.3 Emergency Operating Procedure EOP-5.0, "Steam Generator Tube Rupture Recovery"
- 3.1.4 Emergency Operating Procedure EOP-6.0, "Excess Steam Demand Event"
- 3.1.5 Emergency Operating Procedure EOP-7.0, "Loss of All Feedwater Recovery"
- 3.1.6 Emergency Operating Procedure EOP-8.0, "Loss of Offsite Power/Forced Circulation Recovery"
- 3.1.7 NUREG 0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Section D
- 3.1.8 Palisades Site Emergency Plan
- 3.1.9 EPPOS No 2, "Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions"
- 3.1.10 Engineering Analysis, EA-JBB-01-04, "Failed Fuel Dose Rates on NSSS Piping"

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3.2 REFERENCE DOCUMENTS

- 3.2.1 Emergency Implementing Procedure EI-2.1, "Site Emergency Director"
- 3.2.2 Emergency Implementing Procedure EI-2.2, "Emergency Staff Augmentation"
- 3.2.3 Emergency Implementing Procedure EI-3, "Communications and Notifications"
- 3.2.4 Emergency Implementing Procedure EI-5.0, "Reentry"
- 3.2.5 Emergency Implementing Procedure EI-5.1, "Recovery"
- 3.2.6 Emergency Implementing Procedure EI-6.0, "Offsite Dose Calculation and Recommendations for Protective Actions"
- 3.2.7 Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations"
- 3.2.8 Emergency Implementing Procedure EI-7.0, "Emergency Post Accident Sampling and Determination of Fuel Failure Using Dose Rates"
- 3.2.9 Emergency Implementing Procedure EI-8, "Onsite Radiological Monitoring"
- 3.2.10 Emergency Implementing Procedure EI-9, "Offsite Radiological Monitoring"
- 3.2.11 Emergency Implementing Procedure EI-10, "Accident Environmental Assessment"
- 3.2.12 Emergency Implementing Procedure EI-11, "Determination of Extent of Core Damage"
- 3.2.13 Emergency Implementing Procedure EI-12.1, "Personnel Accountability and Assembly"
- 3.2.14 Emergency Implementing Procedure EI-13, "Evacuations/Reassembly"
- 3.2.15 Emergency Operating Procedure EOP-4.0, "Loss of Coolant Accident Recovery"

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- 3.2.16 Emergency Operating Procedure EOP-9.0, "Functional Recovery Procedure"
- 3.2.17 Palisades Administrative Procedure 3.03, "Corrective Action Process"
- 3.2.18 Palisades Administrative Procedure 4.00, "Operations Organization, Responsibilities and Conduct"
- 3.2.19 Off Normal Procedure ONP-23.1, "Primary Coolant Leak"
- 3.2.20 Off Normal Procedure ONP-23.2, "Steam Generator Tube Leak"
- 3.2.21 System Operating Procedure SOP-34, "Palisades Plant Computer (PPC) System"
- 3.2.22 Palisades Oil and Hazardous Materials Spill Prevention Plan
- 3.2.23 Technical Specifications ADMIN 5.5.1
- 3.2.24 Palisades Offsite Dose Calculation Manual
- 3.2.25 Fire Protection Implementing Procedures
- 3.2.26 Severe Accident Management Guidelines
- 3.2.27 10 CFR 50.54(x)

4.0 **INITIAL CONDITIONS AND/OR REQUIREMENTS**

- 4.1 This procedure shall be implemented any time an event occurs or conditions exist which, in the opinion of the Shift Supervisor/SED, may require activation of the Site Emergency Plan (SEP).

OR

When events occur or conditions exist after the activation of the SEP that, in the opinion of the SED, may require reclassification, either upgrading or downgrading.

- 4.2 A 15-minute goal is a reasonable period of time for assessing and classifying an emergency once indications are available to Control Room operators that an Emergency Action Level (EAL) has been exceeded.

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

5.0 PRECAUTIONS AND LIMITATIONS

- 5.1 Safeguards Contingency Procedures shall be activated if, during event response, signs of tampering, sabotage or other items of suspicious nature are indicated, or if the event affects security systems, ie, loss of detection systems, loss of communications, etc.
- 5.2 Security Safeguard measures can only be suspended by a currently licensed Senior Reactor Operator.

6.0 EMERGENCY CLASSIFICATION

USER ALERT
REFERENCE USE PROCEDURE

Refer to the procedure periodically to confirm that all procedure segments of an activity will be or are being performed. Where required, sign appropriate sign-off blanks to certify that all segments are complete.

6.1 CLASSIFICATION/RECLASSIFICATION

- a. Emergencies are grouped into four classifications listed below in order of severity:

Unusual Event

Events are in process or have occurred which indicate a potential degradation of the level of safety of the Plant. Unusual Events involve minor situations that have the potential to escalate to more serious emergencies.

Alert

Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the Plant. The consideration is, as in an Unusual Event, to prepare to cope with potentially more serious emergencies. Alerts may involve releases of radioactivity limited to small fractions of the EPA Protective Guidelines.

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

Site Area Emergency

Events are in process or have occurred which involve actual or likely major failures of Plant functions needed for protection of the public. The potential for a situation hazardous to the general public is the major concern during a Site Area Emergency. Any releases are not expected to exceed EPA Protective Action Guidelines except near site boundary.

General Emergency

Events are in process or have occurred which involve actual or imminent core degradation with the potential for loss of containment integrity per LCO 3.6.1. Releases can reasonably be expected to exceed EPA Protective Action Guidelines exposure levels offsite for more than the immediate site area.

- b. The SED shall classify emergency conditions/events as follows:
1. Determine the category that conditions/events best fit from the list of keywords below:
 - Alarms/Annunciators - Attachment 1, Pg 1
 - Communication Loss - Attachment 1, Pg 2
 - Dry Fuel Storage Cask-ISFSI - Attachment 1, Pg 3
 - Engineered Safety Features - Attachment 1, Pg 4
 - Evacuation - Control Room - Attachment 1, Pg 5
 - Fire - Attachment 1, Pg 6
 - Fission Product Barriers/Fuel Damage - Attachment 1, Pg 7
 - Hazards - General - Attachment 1, Pg 10
 - Miscellaneous - Attachment 1, Pg 12
 - Natural Phenomenon - Attachment 1, Pg 13
 - Plant Power - Electrical - Attachment 1, Pg 15
 - Primary Coolant System Integrity - Attachment 1, Pg 17
 - Primary Coolant System - Temperature or Pressure Attachment 1, Pg 18
 - Radiation Levels - Attachment 1, Pg 19
 - Releases - Attachment 1, Pg 20
 - Safety Injection System - Attachment 1, Pg 24
 - Secondary Side - Attachment 1, Pg 25
 - Security - Attachment 1, Pg 26
 2. Use the keyword identified above and Attachment 1, "Site Emergency Plan Classification," to classify the conditions/event.

TITLE: EMERGENCY CLASSIFICATION AND ACTIONS

6.2 DETERMINATION OF EMERGENCY ACTIONS/NOTIFICATIONS

NOTE: The SED may assign a person to complete Attachment 2, "Emergency Actions/Notifications."

- a. The numbers in the right hand column of Attachment 1 (Site Emergency Plan Classification) identify actions that should be performed for each emergency. These numbers relate to the Actions/Notifications listed in Attachment 2 of this procedure.
- b. Each action may be categorized as either:
 - 1. Mandatory Actions (M) - Actions that shall be performed within one hour of the declaration of the emergency.
 - OR
 - 2. Subsequent Actions (S) - Actions that should be performed in an expeditious manner as conditions, time, and personnel permit.
 - OR
 - 3. If Needed Actions (I) - Actions that are not required in every case, but may be needed.
- c. Using the "Action" column of Attachment 2, circle each action as M (Mandatory), S (Subsequent), or I (If Needed).
- d. Each action on Attachment 2 should be initialed when the action is completed.

7.0 ATTACHMENTS

7.1 Attachment 1, "Site Emergency Plan Classification"

7.2 Attachment 2, "Emergency Actions/Notifications"

SITE EMERGENCY PLAN CLASSIFICATION

ALARMS/ANNUNCIATORS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
ALERT	Loss of most or all alarms (annunciators) in Control Room, eg, loss of DC Panel D 21-2.	Observation - Modes 3, 4, 5, and 6.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22 If Needed: None
SITE AREA EMERGENCY	Loss of most or all alarms (annunciators) in Control Room <u>AND</u> Plant transient initiated or in progress.	Observation - Modes 1 and 2 <u>OR</u> Modes 3, 4, 5, and 6 with transient in progress.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 21, 22 If Needed: 19, 20

SITE EMERGENCY PLAN CLASSIFICATION

COMMUNICATION LOSS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	<p>Significant loss of offsite communication capability.</p> <p>NOTE: For failures of the Palisades Public Warning System, see Palisades Administrative Procedure 4.00, "Operations Organization, Responsibilities and Conduct," Section 5.5.</p>	<p>Loss of the Emergency Notification System (ENS), and all other phones including satellite phones, that could be used to make notifications to Van Buren County, the State of Michigan and the NRC.</p> <p>NOTE: The availability of one phone is sufficient to inform offsite authorities of plant problems.</p>	<p>Mandatory: 1, 3, 4, 6, 7, 12</p> <p>Subsequent: 15, 22</p> <p>If Needed: None</p>

SITE EMERGENCY PLAN CLASSIFICATION

DRY FUEL STORAGE CASK-ISFSI

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Incident involving a loaded fuel storage cask outside the Auxiliary Building.	<p>Radiation level ≥ 1 rem/hr at 1 ft from a Dry Fuel Storage Cask.</p> <p><u>OR</u></p> <p>Radioactive contamination level 10^5 dpm/100cm² beta-gamma or 10^3 dpm/100cm² alpha from a Dry Fuel Storage Cask.</p> <p><u>OR</u></p> <p>Airborne radioactivity analysis indicating ≥ 10 times the Effluent Concentration levels from a Dry Fuel Storage Cask. (10CFR20, Appendix B, Table 2)</p> <p><u>OR</u></p> <p>SED opinion based on direct observation that containment/shielding of a Dry Fuel Storage Cask has been degraded due to an operational event (cask drop, missile impact, etc).</p>	<p>Mandatory: 1, 3, 4, 6, 7</p> <p>Subsequent: 15, 22</p> <p>If Needed: 11, 13, 14</p>

SITE EMERGENCY PLAN CLASSIFICATION

ENGINEERED SAFETY FEATURES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Inability to reach a required mode within Technical Specification limits.	Plant is not brought to required operating mode within Technical Specifications LCO Action Statement Limit.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: None
ALERT	Failure of the Reactor Protection System (RPS) Instrumentation to complete or initiate an AUTOMATIC Reactor Scram once a Reactor Protection System Setpoint has been exceeded AND a Manual Scram was successful.	The Reactor Protection System (RPS) Setpoint exceeded AND the Automatic RPS actuation did NOT OCCUR AND Manual Reactor Trip from CO-2 or CO-6 was successful.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22 If Needed: 12, 19
	Complete loss of any functions needed for Mode 5.	Both S/Gs are not available for PCS heat removal AND <u>uncontrolled</u> PCS heatup is in progress AND PCS temperature will exceed 200°F in the next hour (use actual heatup rate if available).	
SITE AREA EMERGENCY	Complete loss of heat removal capability.	Loss of Primary Coolant System and Core Heat Removal. (EOP-9.0 Heat Removal (HR-3) Safety Function NOT Met.)	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 21, 22, 23 If Needed: 12, 13, 19, 20
	Failure of the RPS Instrumentation to complete or initiate an AUTOMATIC Reactor Scram and a RPS Setpoint has been exceeded AND a Manual Scram was NOT successful.	An RPS Setpoint(s) exceeded AND Automatic RPS actuation did NOT occur AND manual reactor trip from CO-2 and CO-6 was NOT successful.	
GENERAL EMERGENCY	Failure of the RPS to complete an AUTOMATIC SCRAM AND Manual Scram was NOT successful AND there is indication of an extreme challenge to the ability to cool the core.	Failure of RPS to complete an AUTOMATIC Reactor Trip AND the Manual Reactor Trip from CO-2 and CO-6 was NOT successful AND there are indications of extreme challenge to the Primary Coolant System AND Core Heat Removal. (EOP-9.0 Heat Removal (HR-3) Safety Function NOT Met)	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, Subsequent: 17, 19, 21, 22, 23 If Needed: 12, 20

SITE EMERGENCY PLAN CLASSIFICATION

EVACUATION, CONTROL ROOM

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
ALERT	Evacuation of Control Room anticipated or required with control of shutdown systems established at local stations.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22 If Needed: 12
SITE AREA EMERGENCY	Evacuation of Control Room and control of shutdown systems not established at local stations within 15 minutes.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 21, 22, 23 If Needed: 12, 13, 19, 20

SITE EMERGENCY PLAN CLASSIFICATION

FIRE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Fire within the Plant lasting more than 10 minutes.	Observation <u>OR</u> Fire detection alarm, confirmed by observation.	Mandatory: 1, 3, 4, 6, 7, 16 Subsequent: 15, 22 If Needed: 12, 18
ALERT	Fire potentially affecting safety systems.	Fire can potentially disable equipment which will result in jeopardizing safety function(s) <u>OR</u> SED opinion.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 16 Subsequent: 15, 21, 22 If Needed: 12, 18
SITE AREA EMERGENCY	Fire compromising the function of safety systems.	Fire has disabled equipment resulting in jeopardized safety function(s).	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15, 16 Subsequent: 17, 21, 22 If Needed: 12, 18, 19, 20

NOTE: See General Emergency classification under the Miscellaneous category for a fire which could cause massive damage to Plant systems.

SITE EMERGENCY PLAN CLASSIFICATION

FISSION PRODUCT BARRIERS/FUEL DAMAGE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Loss or Potential Loss of CONTAINMENT BARRIER	SEE TABLE 1	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: None
ALERT	Loss or Potential Loss of EITHER FUEL CLAD BARRIER OR PCS BARRIER	SEE TABLE 1	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 19, 21, 22 If Needed: 12, 13, 14
	Fuel damage/handling accident with release of radioactivity to Containment or Auxiliary Building.* *Note: For incidents involving Dry Fuel Storage Casks outside the Auxiliary Building. See Dry Fuel Storage Cask-ISFSI classification, page 3 of 27.	Failed fuel as indicated by abnormally High Area or Process Radiation Monitors in Containment and/or Auxiliary Building; confirmed by sample analysis <u>OR</u> SED's opinion.	

SITE EMERGENCY PLAN CLASSIFICATION

FISSION PRODUCT BARRIERS/FUEL DAMAGE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
SITE AREA EMERGENCY	Loss or Potential Loss of any TWO BARRIERS	SEE TABLE 1	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15
	Major damage to irradiated fuel in Fuel Handling Building	Large object damages fuel or water loss below fuel level as indicated by abnormally High Area Monitors in the Auxiliary Building.	Subsequent: 13, 17,19, 21, 22, 23 If Needed: 12, 20
GENERAL EMERGENCY	Loss of any TWO BARRIERS AND Potential Loss of THIRD BARRIER	SEE TABLE 1	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17,19, 21, 22, 23 If Needed: 12, 20

SITE EMERGENCY PLAN CLASSIFICATION

FISSION PRODUCT BARRIERS/FUEL DAMAGE TABLE 1

FUEL CLAD BARRIER		PCS BARRIER		CONTAINMENT BARRIER	
Potential Loss	Loss	Potential Loss	Loss	Potential Loss	Loss
PCS Inventory Reactor water level indicates < 102 inches above the bottom of the fuel alignment plate	PCS Activity Coolant Activity > 40 μ Ci/gm Dose Equivalent Iodine * See NOTE 1 below	PCS Inventory Unisolable leak exceeding the capacity of one charging pump	PCS Inventory Leak greater than available makeup capacity as indicated by < 25 °F of PCS subcooling	Cont Atmosphere Pressure > 70 psia OR H ₂ conc > 4.0% OR Pressure > 4.0 psig with less than one full train of Containment Cooling Equipment operating (EOP-9.0 CA-3 safety function not met)	Cont Atmosphere Rapid unexplained pressure drop following initial rise OR Containment pressure or sump level response not consistent with LOCA conditions
CET's CETs show superheated conditions	CET's CETs indicate > 700 °F		PCS Inventory SGTR that results in an SIAS	CET's CET > 1200°F for more than 15 minutes OR CET > 700°F with reactor vessel level below top of active fuel for more than 15 minutes	SGTR Ruptured S/G is also faulted outside of containment OR Primary to Secondary leakrate greater than 10 gpm with nonisolable steam release from affected S/G to the environment
	Containment Activity Containment Gamma Monitor (RIA-2321 OR RIA-2322) reading > 4.0 E3 R/hr ** See NOTE 2 below			Cont Activity Containment Gamma Monitor (RIA-2321 OR RIA-2322) reading > 2.5 E4 R/hr	Cont Isolation Containment Isolation Valve(s) not closed AND a pathway to the environment exist.

* **NOTE 1:** See Emergency Implementing Procedure EI-7.0, "Emergency Post Accident Sampling and Determination of Fuel Failure Using Dose Rates."

** **NOTE 2:** See Emergency Implementing Procedure EI-11, "Determination of Extent of Core Damage."

SITE EMERGENCY PLAN CLASSIFICATION

HAZARDS-GENERAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Aircraft crash onsite or unusual aircraft activity over facility which could affect Plant operation. NOTE: Onsite is defined as the Owner Controlled Area outside of the Protected Area, not including structures.	Observation of event <u>AND</u> SED's opinion.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: 12, 18
	Near or onsite explosion which could affect Plant operation.	Observation of event <u>OR</u> notification from offsite authorities <u>AND</u> SED's opinion.	
	Near or onsite toxic or flammable gas which could affect Plant operation. NOTE: Refer to the Oil and Hazardous Materials Spill Prevention Plan.	Observation of event <u>OR</u> notification from offsite authorities <u>AND</u> SED's opinion.	

SITE EMERGENCY PLAN CLASSIFICATION

HAZARDS-GENERAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
ALERT	Aircraft crash on facility. NOTE: Facility is defined as nonvital structures inside and outside of the Protected Area.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22
	Missile impact from whatever source on facility.	Observation.	If Needed: 12, 16, 18
	Known explosion damage to facility affecting Plant operation.	Observation.	
	Entry into facility environs of uncontrolled toxic or flammable gas which does affect Plant operation. NOTE: Refer to the Oil and Hazardous Materials Spill Prevention Plan.	Observation <u>OR</u> warning from offsite authorities <u>OR</u> detection with portable instrumentation <u>AND</u> SED's opinion.	
SITE AREA EMERGENCY	Aircraft crash affecting Vital structures by impact or fire <u>AND</u> Plant not in Mode 5 or 6.	Observation.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15
	Severe damage to equipment required for safe shutdown from missiles or explosion.	Observation.	Subsequent: 17, 21, 22, 23 If Needed: 12, 13, 16, 18, 19, 20
	Entry of uncontrolled flammable gas into Vital areas <u>OR</u> entry of uncontrolled toxic gas into Vital areas that constitute a safety problem <u>AND</u> Plant not in Mode 5 or 6.	Observation <u>OR</u> SED's opinion <u>OR</u> detection with portable instrumentation.	

SITE EMERGENCY PLAN CLASSIFICATION

MISCELLANEOUS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Plant conditions exist that warrant increased awareness on the part of the Plant staff or state and/or local authorities. NOTE: For Rx trips from high PCS pressure (initiating event), see "Primary Coolant System Temperature or Pressure" category. For coolant radioactivity exceeding Technical Specifications, see "Fission Product Barriers/Fuel Damage."	SED's opinion.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: 12
ALERT	Plant conditions exist that warrant precautionary activation of Technical Support Center and placing Emergency Operations Facility and other emergency personnel on standby.	SED's opinion <u>OR</u> when 10CFR50.54(x) is invoked.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22 If Needed: 12
SITE AREA EMERGENCY	Plant conditions warrant the activation of State and County Emergency Operations Centers and monitoring teams or a precautionary notification to the public near the site.	SED's opinion <u>OR</u> continued power operation outside the Plant's licensed basis, when 10CFR50.54(x) is invoked.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15 Subsequent: 17, 21, 22, 23 If Needed: 12, 13, 19, 20
GENERAL EMERGENCY	Conditions exist that make release of large amounts of radioactivity in a short time possible (eg, any core melt situation).	SED's opinion.	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17, 19, 21, 22, 23
	Any major internal or external events (eg, fires, earthquakes, substantially beyond design basis) which could cause massive common damage to Plant systems.	SED's opinion.	If Needed: 12, 16, 18, 20

SITE EMERGENCY PLAN CLASSIFICATION

NATURAL PHENOMENON

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Any earthquake felt in-Plant or detected on station seismic instrumentation which does NOT cause damage to Plant equipment or structures.	Observation (see Note ¹), or measurement (see Note ²).	Mandatory: 1, 3, 4, 6, 7
	Abnormal water levels including flood or low water or seiche.	Flood, seiche - observation of water approaching 590' level. Low water - Ultimate Heat Sink level lowers to $\leq 572'0"$ (216" below Intake Structure floor level)	Subsequent: 15, 22
	Tornado onsite.	Observation	If Needed: 12
ALERT	Any earthquake that exceeds operating base earthquake surface acceleration levels of 0.1G, but not greater than 0.2G; no damage to equipment required for safe shutdown.	Observation (see Note ¹), or measurement (see Note ²).	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11
	Flood, low water, or seiche near design basis.	Flood, seiche - observation of water above 590' level. Low water - Ultimate Heat Sink level lowers to 569', as read on LI-1338.	Subsequent: 15, 21, 22
	Tornado striking facility. NOTE: Facility is defined as nonvital structures inside and outside of the Protected Area.	Observation	If Needed: 12, 16, 18

NOTE¹: Information on seismic disturbances can be obtained by calling the National Earthquake Information Center, Denver, Colorado, at 1-303-273-8500 (normal hours), or 1-303-273-8427, or 1-303-273-8428 (off normal hours).

NOTE²: Seismic instrumentation is available onsite for post emergency assessment of earthquakes. There are 4 peak recording accelerometers located in Containment on elevations 590', 607', 625', and 649'; these accelerometers require offsite analysis. One strong motion accelerometer is located in the switchyard battery room; this accelerometer is capable of onsite PC analysis. Surveillance checks on these instruments are performed by the I&C Department.

SITE EMERGENCY PLAN CLASSIFICATION

NATURAL PHENOMENON

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
SITE AREA EMERGENCY	Any earthquake that exceeds safe shutdown earthquake surface acceleration levels or 0.2G.	Measurement. (See Note ² Page 13)	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15
	Any earthquake that is of sufficient magnitude to cause damage to equipment and structures needed to safely shut down the Plant.	Observation. (See Note ¹ Page 13)	Subsequent: 17, 21, 22 If Needed: 12, 13, 16, 18, 19, 20
	Flood, low water, or seiche greater than design levels <u>OR</u> failure of protection of Vital equipment at lower levels.	Flood, seiche - observation of water above 594' level. Low water - loss of Ultimate Heat Sink resulting in inability to operate any Service Water Pump to provide adequate cooling to vital equipment for greater than 15 minutes. This equates to an Ultimate Heat Sink level of $\leq 565'9"$. Others - observation of equipment damage.	
	Tornado or sustained winds in excess of design level; ie, of sufficient magnitude to cause damage to equipment and structures needed to safely shut down the Plant.	Observation. Notification by offsite agencies.	

NOTE: For earthquakes substantially beyond Design Basis, see "Miscellaneous" category under General Emergency classification.

SITE EMERGENCY PLAN CLASSIFICATION

PLANT POWER - ELECTRICAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Both Station Batteries not available.	Both battery breakers open for greater than one hour <u>AND</u> DC Bus #1 <u>AND</u> #2 Low Voltage Alarms <u>NOT</u> alarming <u>AND</u> PCS temperature greater than 200°F.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: 12
	Loss of offsite AC power.	Loss of all qualified circuits from offsite <u>AND</u> onsite power is being supplied by diesel generator(s).	
	Loss of emergency onsite AC power.	Both Emergency Diesel Generators inoperable for greater than two hours <u>AND</u> PCS temperature is greater than 200°F.	
ALERT	Loss of offsite <u>AND</u> onsite AC power for less than 15 minutes.	Bus C <u>AND</u> D low voltage alarms.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11
	Loss of all onsite DC power.	DC Bus D11A <u>AND</u> D21A de-energized <u>OR</u> both DC Bus voltages less than 105V.	Subsequent: 15, 21, 22 If Needed: 12
SITE AREA EMERGENCY	Loss of offsite <u>AND</u> onsite AC power for more than 15 minutes.	Bus 1C <u>AND</u> 1D low voltage alarms.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15
	Loss of all vital onsite DC power for more than 15 minutes, <u>AND</u> Plant not in Mode 5 or 6.	DC Bus D11A <u>AND</u> D21A deenergized <u>OR</u> both DC Bus voltages less than 105V.	Subsequent: 17, 21, 22 If Needed: 12, 13, 19, 20

NOTE: The SED should direct the Engineering Support Team and Operations Support Team to evaluate the need to recommend and implement fuel oil conservation measures in the event offsite power has been lost.

SITE EMERGENCY PLAN CLASSIFICATION

PLANT POWER - ELECTRICAL

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
GENERAL EMERGENCY	Loss of offsite and onsite AC power <u>AND</u> there is indication of extreme challenge to ability to cool the core.	Bus 1C <u>AND</u> 1D low voltage alarms <u>AND</u> there are indications of extreme challenge to the Primary Coolant System <u>AND</u> Core Heat Removal. (EOP-9.0 Heat Removal (HR-3) Safety Function NOT met.)	Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 Subsequent: 17, 19, 21, 22, 23 If Needed: 12, 20

NOTE: The SED should direct the Engineering Support Team and Operations Support Team to evaluate the need to recommend and implement fuel oil conservation measures in the event offsite power has been lost.

SITE EMERGENCY PLAN CLASSIFICATION

PRIMARY COOLANT SYSTEM INTEGRITY

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Unidentified or pressure boundary leakage > 10 gpm.	Calculation, <u>OR</u> implementation of Off Normal Procedure ONP-23.1, "Primary Coolant Leak," <u>OR</u> SED opinion that leak rate indications warrant activation of Emergency Plan.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: None
	Identified leakage > 25 gpm.		
	Steam Generator secondary water activity > 0.1μCi/gm dose equivalent I-131.	S/G sample analysis.	
	Primary to secondary leakage through any one SG ≥432 gallons per day (0.3 gpm) but < 50 gpm.	Calculation, <u>OR</u> implementation of Off Normal Procedure ONP-23.2, "Steam Generator Tube Leak."	
ALERT	<u>NOTE:</u> Refer to Fission Product Barrier/Fuel Damage		
SITE AREA EMERGENCY	<u>NOTE:</u> Refer to Fission Product Barrier/Fuel Damage		
GENERAL EMERGENCY	<u>NOTE:</u> Refer to Fission Product Barrier/Fuel Damage		

SITE EMERGENCY PLAN CLASSIFICATION

PRIMARY COOLANT SYSTEM - TEMPERATURE OR PRESSURE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Any challenge to Over-Pressure Protection System (LTOP). NOTE: Momentary PORV activations which occur during PORV Isolation Valve opening shall not be considered as a challenge to the LTOP System.	Annunciation of PORV operation.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: None
	Reactor high-pressure trip. (Initiating event)	Annunciator (RPS alarms) <u>OR</u> event recorder.	
	Pressurizer code safety valve operation.	Observation.	
ALERT	PCS temperature < 25°F subcooled.	Observation, <u>AND</u> Plant above Mode 5.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22 If Needed: None

SITE EMERGENCY PLAN CLASSIFICATION

RADIATION LEVELS

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
ALERT	Radiation levels or airborne contamination indicates a severe degradation in control of radioactive materials.	Radiation monitors increase by a factor of 1000, confirmed <u>OR</u> unexpected Plant area iodine or particulate airborne concentrations > 1000 DAC (per 10CFR20, Appendix B Table 1).	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22 If Needed: 13, 14

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Short term radiological effluent ODCM limits exceeded.	The stack monitor RIA-2326 reaches Alert alarm setpoint for greater than one hour, confirmed by sample analysis, <u>OR</u> Liquid Waste Discharge Monitor (RIA-1049) reaches alarm setpoint and automatic discharge trip function fails. Confirmed by sample analysis.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22 If Needed: 11, 14
	Significant solid or liquid waste spill outside restricted areas with threatened offsite release.	Observation confirmed by survey results <u>OR</u> SED's opinion.	Notify Rad Services to evaluate whether 40CFR302 notifications are necessary.
ALERT	Radiological effluent > 10 times the ODCM instantaneous release rate limit.	A valid stack monitor (RIA-2326) reading of $\geq 1.6E+5$ cpm above background for longer than one hour, <u>OR</u> Liquid Waste Discharge Monitor (RIA-1049) reaches 10 times alarm setpoint and automatic discharge trip function fails, confirmed by sample analysis.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 13, 14, 15, 21, 22 If Needed: 19, 20

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
SITE AREA EMERGENCY	Effluent monitors detect levels corresponding to > 50 mrem/hr TEDE for ½ hour or > 500 mrem/hr TEDE for 2 minutes (or 5 times these levels to the Adult Thyroid CDE) at the site boundary for <u>adverse meteorological conditions</u> . These levels are projected based on other Plant parameters (eg, radiation level in Containment with leak rate appropriate for existing Containment pressure) or are measured in the environs. EPA Protective Action Guidelines (see Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations") are projected to be exceeded outside the site boundary.	<ol style="list-style-type: none"> Any of the following valid Radiation Monitor readings for greater than 30 mins: <ol style="list-style-type: none"> RIA-2326 $\geq 1.3E+6$ CPM above background. RIA-2323/RIA-2324 ≥ 215 CPM above background <u>AND</u> steam release in progress. RIA-2321/RIA-2322 $\geq 5.1E+4$ rem/hr above background <u>AND</u> Containment integrity intact; <u>OR</u> Any of the following valid Radiation Monitor readings for greater than 2 minutes: <ol style="list-style-type: none"> RIA-2327 ≥ 11 mrem/hr above background. RIA-2323/RIA-2324 ≥ 630 CPM above background <u>AND</u> steam release in progress. RIA-2321/RIA-2322 $\geq 5.1E+5$ rem/hr above background <u>AND</u> Containment integrity intact; <u>OR</u> 	<p>Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 13, 14, 15</p> <p>Subsequent: 17, 19, 20, 21, 22, 23</p> <p>If Needed:</p> <p>None</p>

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
SITE AREA EMERGENCY (Cont'd)		<p>3. Measured radiation levels at site boundary indicate any of the following:</p> <p>(a) TEDE Rate > 50 mrem/hr for 30 minutes.</p> <p>(b) TEDE Rate > 500 mrem/hr for 2 minutes.</p> <p>(c) Adult Thyroid CDE Rate > 250 mrem/hr for 30 minutes.</p> <p>(d) Adult Thyroid CDE Rate > 2500 mrem/hr for 2 minutes.</p>	

SITE EMERGENCY PLAN CLASSIFICATION

RELEASES

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
GENERAL EMERGENCY	<p>Effluent monitors detect levels corresponding to 1 rem/hr TEDE or 5 rem/hr Adult Thyroid CDE Rate at the site boundary under <u>actual meteorological conditions</u>. These levels are projected based on other Plant parameters (eg, radiation levels in Containment with leak rate appropriate for existing Containment pressure) or are measured in the environs.</p> <p>NOTE: Refer to Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations."</p>	<ol style="list-style-type: none"> Any of the following Radiation Monitor readings <u>may</u> indicate a General Emergency: <ol style="list-style-type: none"> RIA-2327 \geq 22 mrem/hr above background. RIA-2323/RIA-2324 \geq 1260 CPM above background <u>AND</u> main steam release occurring. RIA-2321/RIA-2322 \geq 1.0E+6 rem/hr above background <u>AND</u> Containment leakage within design limits; <u>OR</u> Dose Projection from Emergency Implementing Procedure EI-6.0, "Offsite Dose Calculation and Recommendations for Protective Actions," indicate any of the following with <u>Existing Meteorological Conditions</u>, at or beyond the site boundary: <ol style="list-style-type: none"> TEDE Rate \geq 1 rem integrated over a period of one hour. Adult Thyroid CDE Rate \geq 5 rem integrated over a period of one hour. Measured radiation levels at or beyond the site boundary indicate any of the following: <ol style="list-style-type: none"> TEDE Rate \geq 1 rem integrated over a period of one hour. Adult Thyroid CDE Rate \geq 5 rem integrated over a period of one hour. 	<p>Mandatory: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15,</p> <p>Subsequent: 17, 19, 20, 21, 22, 23</p>

SITE EMERGENCY PLAN CLASSIFICATION

SAFETY INJECTION SYSTEM

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	<p>Safety Injection initiated <u>AND</u> discharged to vessel</p> <p>NOTE: Applies to HPSI, LPSI, or SIT Injection only. For injections solely from charging pumps/BA pumps to PCS due to SIS, include as part of one hour (or four hours) nonemergency report per Palisades Administrative Procedure 4.00, "Operations Organization, Responsibilities and Conduct."</p>	Annunciation <u>AND</u> flow verification.	<p>Mandatory: 1, 3, 4, 6, 7</p> <p>Subsequent: 15, 22</p> <p>If Needed: None</p>

SITE EMERGENCY PLAN CLASSIFICATION

SECONDARY SIDE

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Failure of a safety or relief valve in a safety-related system to close following reduction of applicable pressure.	Annunciation <u>AND</u> pressure indications, <u>OR</u> observation.	Mandatory: 1, 3, 4, 6, 7 Subsequent: 15, 22
	Main Steam Line/Main Feedwater Line break outside Containment which is isolated by Main Steam isolation signal (manually or auto).	Observation of isolated excess Steam Demand Event conditions.	If Needed: None
	Turbine rotating component failure requiring turbine trip.	Turbine trip (other than required for normal Plant shutdown) <u>AND</u> observation of turbine malfunction or failure.	
ALERT	Main Steam Line/Main Feedwater Line break inside or outside Containment which is not isolated.	Observation of excess Steam Demand Event conditions.	Mandatory: 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 Subsequent: 15, 21, 22
	Turbine failure causing casing penetration.	Observation <u>AND</u> turbine trip.	If Needed: None

NOTE: For accidents involving Main Steam Line/Main Feedwater Line breaks and failed Fuel/Steam Generator tube leaks, see "Primary Coolant System Integrity."

NOTE: For accidents involving primary to secondary leakage, see "Primary Coolant System Integrity."

SITE EMERGENCY PLAN CLASSIFICATION

SECURITY

CLASSIFICATION	EMERGENCY ACTION LEVEL	METHOD OF DETECTION	ACTIONS
UNUSUAL EVENT	Security threat or attempted entry or attempted sabotage.	Security alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 3, 4, 6, 7, 12 Subsequent: 15, 22 If Needed: None
ALERT	Security threat exists that results in adversaries commandeering an area of the Plant, but not control over shutdown capability or of any Vital areas.	Security Alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 2*, 3, 4, 6, 7, 8*, 9*, 10, 11*, 12 Subsequent: 15, 21, 22 If Needed: 15, 19
SITE AREA EMERGENCY	Physical attack on the Plant involving imminent occupancy of the Control Room, auxiliary shutdown panels, or other Vital areas.	Security alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 2*, 3, 4, 6, 7, 8*, 9*, 10, 11*, 12, 14*, 15 Subsequent: 17*, 21, 22 If Needed: 13, 19, 20
GENERAL EMERGENCY	Physical attack on the Plant has resulted in unauthorized personnel occupying the Control Room or any other Vital areas.	Security alarms <u>OR</u> observation <u>AND</u> activation of Safeguards Contingency Procedures.	Mandatory: 1*, 2*, 3, 4, 5, 6, 7, 8*, 9*, 10, 11*, 12, 13, 14*, 15 Subsequent: 17*, 21, 22, 23 If Needed: 16, 18, 19, 20

***NOTE:** Performance of this action may be delayed until the safety of personnel is assured.

EMERGENCY ACTIONS/NOTIFICATIONS

Proc No EI-1
Attachment 2
Revision 38
Page 1 of 1

EVENT TYPE (Circle one): UE / ALERT / SAE / GENERAL Date: _____

ITEM	ACTION (circle)	DESCRIPTION OF ACTION	REF	DONE?
1	M S I	Announce Emergency on PA	EI-3	
2	M S I	Sound Emergency Siren	EI-3	
3	M S I	Notify Van Buren County (within 15 min of declaration) See Notes 2 and 3 below	EI-3	
4	M S I	Notify State of Michigan (within 15 min of declaration) See Notes 2 and 3 below	EI-3	
5	M S I	Provide Protective Action Recommendation	EI-6.13	
6	M S I	Call Duty and Call Superintendent	N/A	
7	M S I	Notify NRC See Note 1 below	EI-3	
8	M S I	Perform Personnel Accountability - Notify Security at Ext 2278	EI-12.1	
9	M S I	Initiate Staff Augmentation - Notify Security at Ext 2278 See Note 4 below	EI-2.2	
10	M S I	Activate ERDS	SOP-34	
11	M S I	Initiate Onsite Monitoring	EI-8	
12	M S I	Activate Safeguards Contingency Procedures	N/A	
13	M S I	Perform Offsite Dose Assessment	EI-6.0	
14	M S I	Initiate Offsite Monitoring	EI-9	
15	M S I	Notify Public Affairs - Day @ 764-8931 Night @ 637-5170	EI-3	
16	M S I	Activate Fire Protection Plan	FPIPs	
17	M S I	Evacuate Nonessential Personnel	EI-13	
18	M S I	Notify Covert Fire Dept and Call Security @ 2278	EI-3	
19	M S I	Perform Core Damage Calculation	EI-7.0/EI-11	
20	M S I	Perform Environmental Assessment	EI-10	
21	M S I	Initiate Re-entry/Recovery	EI-5	
22	M S I	Initiate Condition Report	Admin 3.03	
23	M S I	Monitor Severe Accident Management Guideline for Implementation	SAMGs	

LEGEND AND NOTES: M=MANDATORY S=SUBSEQUENT I=IF NEEDED

- NOTES:**
1. = 10CFR50.72(c) REQUIRES THAT CONSUMERS ENERGY "MAINTAIN AN OPEN, CONTINUOUS COMMUNICATION CHANNEL WITH THE NRC OPERATIONS UPON REQUEST OF THE NRC"
 2. = 15 MINUTE UPDATES REQUIRED WHEN ABOVE UE
 3. = REFER TO EI-3 ATTACHMENT 2, FOR BACKUP PHONE NUMBERS (IF NEEDED)
 4. = FOR DAYSHIFT ON WEEKDAYS, SOUND THE EMERGENCY SIREN AND PERFORM PERSONNEL ACCOUNTABILITY ALL OTHER SHIFTS INCLUDING WEEKENDS AND HOLIDAYS. NOTIFY THE SECURITY SHIFT LIEUTENANT AT (EXT 2278) WHO WILL INITIATE THE EMERGENCY AUGMENTATION NOTIFICATION SYSTEM.

NOTE: Completed forms shall be transmitted to Plant Licensing within 24 hours.