



## DAEC EMERGENCY PLANNING DEPARTMENT PROCEDURE TRANSMITTAL ACKNOWLEDGEMENT MEMO (TAM-105)

To: NRC-NRR Document Control Desk  
US NRC  
Washington DC 20555

Re: Entire EPIP Document (Copy 28)

PSM Title: n/a

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Distribution Date: 11 / 14 / 2003  
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Return by: 12 / 05 / 2003

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Please perform the following to your assigned manual. If you have any questions regarding this TAM please contact Don A. Johnson at 319-851-7872.

	REMOVE Rev. 145	INSERT Rev. 146
EPIP Table of Contents Revision		
EPIP 1.1 (PWR: 23169)	Rev. 21	Rev. 22
EPIP EAL-01 (PWR: 23187)	Rev. 4	Rev. 5
EPIP EAL-03 (PWR: 21938)	Rev. 4	Rev. 5

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PERFORMED BY:

Print Name

Sign Name

Date

Please return to: K. Dunlap  
PSC/Emergency Planning  
3313 DAEC Rd.  
Palo, IA 52324

To be completed by DAEC EP personnel only:

Date TAM returned: \_\_\_\_\_

EPTools updated: \_\_\_\_\_

1045

Friday, November 14, 2003

NRC-NRR Document Control Desk  
US NRC  
Washington, DC 20555

To: NRC-NRR Document Control Desk  
From: DAEC Emergency Planning Department

Re: Description of changes to the following documents

EPIP            1.1            Determination of Emergency Action Level  
Add more information re: EAL Operating modes. Remove requirement to reference the EAL Bases Document for every EAL declaration.

EPIP            EAL-01            Abnormal Rad Levels/Radioactive Effluent EAL Table  
Remove reference to a telemetered perimeter rad monitoring system. Define 200xODAM limit.

EPIP            EAL-03            Hazards and Other Conditions Affecting Plant Safety EAL Table  
Various changes to ensure consistency with the EAL Bases Document and NEI 99-01 revision 4.

Please contact Paul Sullivan, Manager of Emergency Preparedness at DAEC, (319)851-7191, if you require further information.

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Usage Level  
REFERENCE

Effective Date: 11/21/03

TECHNICAL REVIEW	
Prepared and Verified by: <u>Don A. Johnson</u>	Date: <u>11/5/03</u>
Validated by: <u>Monica P. Zimmerman</u> Emergency Planning Staff	Date: <u>11/5/03</u>

PROCEDURE APPROVAL	
I am responsible for the technical content of this procedure.	
Approved by: <u>Don A. Johnson</u> Manager, Emergency Planning	Date: <u>11-6-03</u>

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## 1.0 PURPOSE

- (1) Provides guidance to the Operations Shift Manager (OSM), Emergency Coordinator (EC), or Emergency Response and Recovery Director (ER&RD), as applicable, when determining a need to declare or retract an emergency event at DAEC.

## 2.0 DEFINITIONS

### (1) Emergency Action Level (EAL)

- (a) A pre-determined, site-specific, observable threshold for a plant Initiating Condition that places the plant in a given Emergency Classification Level. An EAL can be: an instrument reading, an equipment status indicator, a measurable parameter (on-site or off-site), a discrete observable event, results of analyses, entry into specific emergency operating procedures, or another phenomenon which, if it occurs, indicates entry into a particular Emergency Classification Level.

### (2) EAL Technical Basis Document

- (a) This document was developed to :
  - (i) Provide clear documentation of how NEI generic guidance was applied in the development of DAEC upgraded EALs.
  - (ii) Provide justification of any exceptions or additions to NEI generic guidance as it is applied to DAEC.
  - (iii) Facilitate the regulatory approval of the upgraded EALs that is required under 10CFR50 Appendix E.

### (3) Emergency Classification Level

- (a) These are taken from 10CFR50 Appendix E. They are, in escalating order :
  - (i) (Notification of) Unusual Event (UE): Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant/ISFSI. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs.

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(ii) Alert: Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant/ISFSI. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

(iii) Site Area Emergency (SAE): Events are in progress or have occurred which involve an actual or likely major failure of plant functions needed for the protection of the public. Any release is not expected to exceed EPA Protective Action Guideline exposure levels except near the site boundary.

(iv) General Emergency (GE): Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting, with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Guideline exposure levels offsite for more than the immediate site area.

(4) ISFSI

(a) Independent Spent Fuel Storage Installation facility and associated cask loading and storage activities.

(5) Retraction

(a) The recanting of an Emergency Action Level that was declared due to an indeterminate condition.

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### 3.0 INSTRUCTIONS

#### 3.1 OVERVIEW

- (1) The Control Room, TSC, and EOF staff shall evaluate plant/ISFSI conditions to determine whether any EAL Threshold Values have been met. The OSM/EC/ER&RD should declare the appropriate EAL within 15 minutes once indications are available that the Threshold Value for an EAL has been exceeded.

#### NOTE

For the purpose of making EAL determinations it is acceptable to use SPDS or ERDS information. It is always prudent to verify the SPDS or ERDS information with redundant instrumentation, when it is available.

- (2) The OSM/EC/ER&RD shall ensure requisite notifications are made within the 15-minute requirement, per EPIP 1.2 'Notification'.
- (3) Plant assembly and site evacuation decisions shall be made in accordance with EPIP 1.3, 'Plant Assembly and Site Evacuation'.
- (4) The EC/OSM/ER&RD shall review and approve the emergency classification to determine if events/conditions have changed that may warrant upgrade, declassification, termination or retraction.
- (5) The EC/OSM/ER&RD shall ensure activation of the Emergency Response Organization is underway/completed, as required.
- (6) If an EAL has been declared due to an indeterminate condition and subsequent investigation/evaluation discovers the condition did not exist, the event may be retracted. Notifications shall be made per EPIP 1.2 'Notification'.
- (7) The plant operating mode that existed at the time that the event occurred, prior to any protective system or operator action initiated in response to the condition, is compared to the mode applicability of the EALs. If an event occurs, and a lower or higher plant operating mode is reached before the emergency classification can be made, the declaration shall be based on the mode that existed at the time the event occurred.

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### 3.2 EVENT CLASSIFICATION

- (1) Emergency conditions are classified in an ascending order of severity as follows:
  - (a) NOTIFICATION OF UNUSUAL EVENT (Recognition Category AU, FU, HU, SU, EU)
  - (b) ALERT (Recognition Category AA, FA, HA, SA)
  - (c) SITE AREA EMERGENCY (Recognition Category AS, FS, HS, SS)
  - (d) GENERAL EMERGENCY (Recognition Category AG, FG, HG, SG)
- (2) When a suspected emergency condition occurs, the EC/OSM/ER&RD and their associated staff, shall make the initial analysis and determination of the classification, referring to the appropriate EAL tables in Appendix 1 and the EAL Basis Document. The appropriate EAL should be declared within 15 minutes once indications are available that the Threshold Value for an EAL has been exceeded. Appendix 1 of the EPIP's contains the five tables, EAL-01 through EAL-05, covering Emergency Action Levels.
- (3) To determine an EAL: Categorize the general type of event, referring to the EAL tables.
- (4) If the OSM has been fulfilling the responsibilities of the EC, upon declaring the emergency classification, the event, the time declared and the action(s) taken shall be logged in the Shift Manager's Log.
- (5) Other events not specifically included in this procedure which may be based on plant/ISFSI prognosis, weather, or other external events, as well as events that have a high likelihood of occurrence may be classified as a NOTIFICATION OF UNUSUAL EVENT, ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY at the discretion of the EC/OSM/ER&RD. The primary consideration for classification of these events shall be to protect the health and safety of site personnel and the public.
- (6) The highest emergency classification for which an Emergency Action Level (EAL) is CURRENTLY met should be declared.
  - (a) If an action level for a higher classification was exceeded, but the situation has been resolved prior to offsite reporting, the higher classification level should be REPORTED to the offsite agencies and the NRC, but SHOULD NOT be declared.

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- (b) The notification must indicate the **CURRENT** classification, the period of time that the higher classification existed and the mitigating conditions that caused the reduction in the emergency classification.
- (7) Reclassification shall be reviewed and approved by the EC/OSM/ER&RD.
  - (a) Reclassification should be based upon the guidance provided in the EAL Tables and Reference 1.
  - (b) The EC/OSM should consult with the following personnel, if available, during such evaluations:
    - (i) Site Radiation Protection Coordinator (SRPC)
    - (ii) TSC Operations Supervisor
    - (iii) Tech and Engineering Supervisor
    - (iv) Emergency Response and Recovery Director
  - (c) The ER&RD should consult with the following personnel:
    - (i) Emergency Coordinator
    - (ii) EOF OPS Liaison
  - (d) The EC/OSM shall ensure that offsite agencies are notified of the reclassification in accordance with EPIP 1.2, 'Notification'. If the Emergency Operations Facility (EOF) has been declared operational, the ER&RD shall assume this responsibility, unless otherwise advised.
  - (e) If the OSM is fulfilling the responsibilities of the EC, reclassification of an event shall be documented in the Operations Shift Manager's Log or the TSC Supervisor's Log as appropriate.
- (8) As plant/ISFSI conditions change, the EC/OSM/ER&RD shall ensure that plant/ISFSI status is monitored and the EAL Tables and EAL Basis Document are constantly consulted in order to adjust the emergency classification, as appropriate. The appropriate EAL should be declared within 15 minutes once indications are available that the Threshold Value for an EAL has been exceeded.



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### 3.3 CRITERIA FOR EMERGENCY CLASSIFICATION CHANGES

- (1) As plant/ISFSI conditions change, consider :
  - (a) The probability that plant/ISFSI conditions will continue to improve.
  - (b) The probability that plant/ISFSI conditions might worsen, thereby necessitating upgrading the emergency classification once the emergency has been downgraded.
  - (c) The need to staff all or some of the emergency response facilities.
  - (d) Evaluating existing conditions with respect to the criteria established for each emergency classification per the EAL Tables.
  - (e) The control or termination of non-routine releases of radioactive material to the environment.
  - (f) The control or cessation of any fire, flood, earthquake, or similar emergency conditions.
  - (g) The specified corrective action has been taken, or the plant has been placed in the appropriate operating mode.
  - (h) All required notifications are completed.
  - (i) The TSC technical staff has evaluated the plant/ISFSI status with respect to the Technical Specifications/applicable 10CFR 72 Certificate of Compliance requirements and recommends downgrading the emergency classification.
- (2) An emergency condition can be considered resolved, and a Recovery Organization established, if necessary, when the following guidelines have been met or addressed:
  - (a) Existing conditions no longer meet the emergency classification criteria and it appears unlikely that conditions will deteriorate further.
  - (b) No surveillance relative to offsite protective actions is needed, except for the control of foodstuffs, water, and offsite contamination, or environmental assessment activities.
  - (c) Radiation levels in affected in-plant/ISFSI areas are stable or decreasing to acceptable levels.

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- (d) Releases of radioactive material to the environment are under control or have ceased.
- (e) No Emergency Operating Procedure (EOP) entry condition exists.
- (f) The reactor is in a stable and safe shutdown condition, and long-term core cooling is available as required.
- (g) The control or cessation of any fire, flood, earthquake, or similar emergency conditions.
- (h) All EAL notifications have been completed.
- (i) Offsite conditions will not limit access of personnel and support resources.
- (j) Discussions have been held with the Nuclear Regulatory Commission (NRC), State and local organizations with FEMA input as necessary, and agreement has been reached to terminate the emergency.
- (k) The TSC technical staff has evaluated the plant/ISFSI status with respect to the Technical Specifications/applicable 10CFR 72 Certificate of Compliance requirements and concurs with the termination of the emergency.

#### **4.0 RECORDS**

All logs, forms, and records generated must be forwarded to the EP Department and retained in accordance with QA Record Retention requirements. Authorization for disposal shall be obtained from the NRC.

#### **5.0 REFERENCES**

- (1) DAEC Emergency Plan
- (2) DAEC EAL Technical Basis Document
- (3) DAEC Technical Specifications
- (4) Emergency Operating Procedures (EOPs)
- (5) Updated Final Safety Analysis Report

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- (6) EPIP 1.2, 'Notifications'
- (7) 10CFR50 Appendix E
- (8) 10CFR 72.32(c) and (d)
- (9) NEI Methodology for Development of Emergency Action Levels  
NUMARC/NESP-007 NEI 99-01 Revision 4, May 1999/September 2002
- (10) NEI Methodology for Development of Emergency Action Levels  
NUMARC/NESP-007 NEI 97-03 August 1997

#### 6.0 EPIP FORMS

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**EAL TABLE**  
**ABNORMAL RAD LEVEL      RADIOACTIVE EFFLUENT**

EVENT TYPE	UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY
OFFSITE RAD CONDITIONS	<p style="text-align: center;"><b>AU1</b></p> <p>Any Unplanned Release of Gaseous or Liquid Radioactivity to the Environment That Exceeds Two Times the Offsite Dose Assessment Manual (ODAM) Limit and Is Expected to Continue For 60 Minutes or Longer</p> <p style="text-align: center;">Operating Modes: ALL</p> <p>Valid Reactor Building ventilation rad monitor (Kaman 3/4, 5/6, 7/8) or Turbine Building ventilation rad monitor (Kaman 1/2) reading above 1 E-3 <math>\mu\text{Ci/cc}</math> and is expected to continue for 60 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid Offgas Stack rad monitor (Kaman 9/10) reading above 2.0 E-1 <math>\mu\text{Ci/cc}</math> and is expected to continue for 60 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid LLRPSF rad monitor (Kaman 12) reading above 1.0 E-3 <math>\mu\text{Ci/cc}</math> and is expected to continue for 60 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid GSW rad monitor (RIS-4767) reading above 3E+3 CPS and is expected to continue for 60 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid RHRSW &amp; ESW rad monitor (RM-1997) reading above 8E+2 CPS and is expected to continue for 60 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid RHRSW &amp; ESW Rupture Disc rad monitor (RM-4268) reading above 1E+3 CPS and is expected to continue for 60 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Confirmed sample analyses for gaseous or liquid releases indicates concentrations or release rates in excess of 2 times ODAM limits and is expected to continue for 60 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid dose assessment indicating dose rates beyond the site boundary above 0.1 mrem/hr TEDE and is expected to continue for 60 minutes or longer.</p>	<p style="text-align: center;"><b>AA1</b></p> <p>Any Unplanned Release of Gaseous or Liquid Radioactivity to the Environment that Exceeds 200X the Offsite Dose Assessment Manual (ODAM) Limit and Is Expected to Continue for 15 Minutes or Longer</p> <p style="text-align: center;">Operating Modes: ALL</p> <p>Valid Reactor Building ventilation rad monitor (Kaman 3/4, 5/6, 7/8) or Turbine Building ventilation rad monitor (Kaman 1/2) reading above 3 E-2 <math>\mu\text{Ci/cc}</math> and is expected to continue for 15 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid Offgas Stack rad monitor (Kaman 9/10) reading above 6 E+0 <math>\mu\text{Ci/cc}</math> and is expected to continue for 15 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid LLRPSF rad monitor (Kaman 12) reading above 1 E-1 <math>\mu\text{Ci/cc}</math> and is expected to continue for 15 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid GSW rad monitor (RIS-4767) reading above 3E+5 CPS and is expected to continue for 15 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid RHRSW &amp; ESW rad monitor (RM-1997) reading above 8E+4 CPS and is expected to continue for 15 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid RHRSW &amp; ESW Rupture Disc rad monitor (RM-4268) reading above 1E+5 CPS and is expected to continue for 15 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Confirmed sample analyses for gaseous or liquid releases indicates concentrations or release rates with a release duration and is expected to continue for 15 minutes or longer in excess of 200 times ODAM limit.</p> <p style="text-align: center;">OR</p> <p>Valid site boundary radiation reading of greater than 10 mrem/hr above normal background and is expected to continue for 15 minutes or longer.</p> <p style="text-align: center;">OR</p> <p>Valid dose assessment indicating dose rates beyond the site boundary above 10 mrem/hr TEDE and is expected to last for 15 minutes or longer.</p>	<p style="text-align: center;"><b>AS1</b></p> <p>Site Boundary Dose Resulting from an Actual or Imminent Release of Gaseous Radioactivity Exceeds 100 mrem TEDE or 500 mrem CDE Thyroid for the Actual or Projected Duration of the Release</p> <p style="text-align: center;">Operating Modes: ALL</p> <p>Valid Reactor Building ventilation rad monitor (Kaman 3/4, 5/6, 7/8) or Turbine Building ventilation rad monitor (Kaman 1/2) reading above 6 E-2 <math>\mu\text{Ci/cc}</math> and is expected to continue for 15 minutes or longer. (Dose assessment not available)</p> <p style="text-align: center;">OR</p> <p>Valid Offgas Stack rad monitor (Kaman 9/10) reading above 4 E+1 <math>\mu\text{Ci/cc}</math> and is expected to continue for 15 minutes or longer. (Dose assessment not available)</p> <p style="text-align: center;">OR</p> <p>Field survey results indicate site boundary dose rates exceeding 100 mrem/hr expected to continue for more than one hour; or analyses of field survey samples indicate CDE Thyroid of 500 mrem for one hour of inhalation.</p> <p style="text-align: center;">OR</p> <p>Dose assessment determines integrated accident dose projection outside the site boundary above 100 mrem TEDE or above 500 mrem CDE Thyroid.</p>	<p style="text-align: center;"><b>AG1</b></p> <p>Site Boundary Dose Resulting from an Actual or Imminent Release of Gaseous Radioactivity that Exceeds 1000 mrem TEDE or 5000 mrem CDE Thyroid for the Actual or Projected Duration of the Release</p> <p style="text-align: center;">Operating Modes: ALL</p> <p>Valid Reactor Building ventilation rad monitor (Kaman 3/4, 5/6, 7/8) or Turbine Building ventilation rad monitor (Kaman 1/2) reading above 6 E-1 <math>\mu\text{Ci/cc}</math> and is expected to continue for 15 minutes or longer. (Dose assessment not available)</p> <p style="text-align: center;">OR</p> <p>Valid Offgas Stack rad monitor (Kaman 9/10) reading above 4 E+2 <math>\mu\text{Ci/cc}</math> and is expected to continue for 15 minutes or longer. (Dose assessment not available)</p> <p style="text-align: center;">OR</p> <p>Field survey results indicate site boundary dose rates exceeding 1,000 mrem/hr expected to continue for more than one hour; or analyses of field survey samples indicate CDE Thyroid of 5,000 mrem for one hour of inhalation.</p> <p style="text-align: center;">OR</p> <p>Dose assessment determines integrated accident dose projection outside the site boundary above 1,000 mrem TEDE or above 5,000 mrem CDE Thyroid.</p>
ONSITE RAD CONDITIONS	<p style="text-align: center;"><b>AU2</b></p> <p>Unexpected Increase in Plant Radiation</p> <p style="text-align: center;">Operating Modes: ALL</p> <p>Uncontrolled loss of reactor cavity or fuel pool water level with all spent fuel assemblies remaining covered by water as indicated by ANY of the following:</p> <ul style="list-style-type: none"><li>Report to control room</li><li>Valid fuel pool level indication (LI-3413) below 36 feet and lowering</li><li>Valid WR GEMAC Floodup Indication (LI-4541) coming on scale.</li></ul> <p style="text-align: center;">OR</p> <p>Unexpected ARM reading offscale high or above 1000 times normal* reading.</p> <p>*Normal levels can be considered as the highest reading in the past twenty-four hours excluding the current peak value.</p>	<p style="text-align: center;"><b>AA2</b></p> <p>Major Damage to Irradiated Fuel or Loss of Water Level that Has or Will Result in the Uncovering of Irradiated Fuel Outside the Reactor Vessel</p> <p style="text-align: center;">Operating Modes: ALL</p> <p>Report of either of the following:</p> <ul style="list-style-type: none"><li>Valid Refueling Floor North End (RM-9163), Refueling Floor South End (RM-9164), or New Fuel Storage Area (RM-9153) ARM Reading above 10 mr/hr</li><li>Valid Spent Fuel Storage Area (RM-9178) ARM Reading above 100 mr/hr</li></ul> <p style="text-align: center;">OR</p> <p>Report of visual observation of Irradiated Fuel uncovered</p> <p style="text-align: center;">OR</p> <p>Valid water level reading below 450" as indicated on LI-4541 (floodup) for the Reactor Refueling Cavity that will result in Irradiated Fuel uncovering.</p> <p style="text-align: center;">OR</p> <p>Valid Fuel Pool water level indication (LI-3413) below 16 feet that will result in Irradiated Fuel uncovering.</p>		
		<p style="text-align: center;"><b>AA3</b></p> <p>Release of Radioactive Material or Increases in Radiation Levels Within the Facilities That Impedes Operation of Systems Required to Maintain Safe Operations or to Establish or to Maintain Cold Shutdown</p> <p style="text-align: center;">Operating Modes: ALL</p> <p>Valid Control Room Area Radiation Monitor (RM-9162) reading above 15 mr/hr.</p> <p style="text-align: center;">OR</p> <p>Valid North CRD Module Area Rad Monitor (RM-9168), reading above 500 mr/hr affecting the Remote Shutdown Panel, 1C388.</p>		

EAL T E  
HAZARDS and OTHER CONDITIONS AFFECTING PLANT SAFETY

EVENT TYPE	UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY																												
NATURAL DISASTERS AND DESTRUCTIVE PHENOMENA	<b>HU1</b> Natural and Destructive Phenomena Affecting the Protected Area  Operating Modes: ALL  Receipt of the Amber .01G Recorders Running Light and the wailing seismic alarm on 1C35 OR Report of tomado touching down within Plant Protected Area or within switchyard. OR Assessment by the control room that a destructive event has occurred. OR Vehicle crash into plant structures or systems within Plant Protected Area. OR Report of an unanticipated explosion within the Plant Protected Area resulting in visible damage to permanent structures or equipment. OR Report of turbine failure resulting in casing penetration or damage to turbine or generator seals. OR River level above 757 feet. OR Any area water level above Max Normal Operating Limit. OR River level below 725 feet 6 inches.	<b>HA1</b> Natural and Destructive Phenomena Affecting the Plant Vital Area  Operating Modes: ALL  Receipt of the Amber Operating Basis Earthquake Light and the wailing seismic alarm on 1C35 (± 0.06 gravity). OR Report of tomado striking plant Vital Area. OR Report to control room of damage affecting Safe Shutdown Areas. OR Vehicle crash affecting plant Vital Areas. OR Sustained wind speed at or above 95 MPH. OR Turbine failure-generated missiles affecting Safe Shutdown Areas. OR River level above 767 feet. OR Water level above Max Safe Operating Limit in 2 or more areas AND Reactor shutdown is required. OR River level below 724 feet 6 inches.	<table><tr><th colspan="2">Safe Shutdown/Vital Areas *</th></tr><tr><th>Category</th><th>Area</th></tr><tr><td>Electrical Power</td><td>Switchyard, 1G31 DG and Day Tank Rooms, 1G21 DG and Day Tank Rooms, Battery Rooms, Essential Switchgear Rooms, Cable Spreading Room</td></tr><tr><td>Heat Sink/ Coolant Supply</td><td>Torus Room, Intake Structure, Pumphouse</td></tr><tr><td>Containment</td><td>Drywell, Torus</td></tr><tr><td>Emergency Systems</td><td>NE, NW, SE Corner Rooms, HPCI Room, RCIC Room, RHR Valve Room, North CRD Area, South CRD Area, CSTs</td></tr><tr><td>Other</td><td>Control Building, Remote Shutdown Panel 1C388 Area, Panel 1C55/56 Area, SSGT Room</td></tr></table> <p>*Vital Areas for EAL purposes is not the same as Vital Areas for Security Purposes. Reference the Security Plan for areas considered vital by Security.</p>		Safe Shutdown/Vital Areas *		Category	Area	Electrical Power	Switchyard, 1G31 DG and Day Tank Rooms, 1G21 DG and Day Tank Rooms, Battery Rooms, Essential Switchgear Rooms, Cable Spreading Room	Heat Sink/ Coolant Supply	Torus Room, Intake Structure, Pumphouse	Containment	Drywell, Torus	Emergency Systems	NE, NW, SE Corner Rooms, HPCI Room, RCIC Room, RHR Valve Room, North CRD Area, South CRD Area, CSTs	Other	Control Building, Remote Shutdown Panel 1C388 Area, Panel 1C55/56 Area, SSGT Room														
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FIRE	<b>HU2</b> Fire Within PROTECTED AREA Not Extinguished Within 15 Minutes of Detection  Operating Modes: ALL  Fire in buildings or areas contiguous to any of the following areas not extinguished within 15 minutes of control room notification or verification of a control room alarm: <ul style="list-style-type: none"><li>Reactor, Turbine, Control, Admin/Security</li><li>Intake structure</li><li>Pump house</li></ul>	<b>HA2</b> Fire or Explosion Affecting the Operability of Plant Safety Systems Required to Establish or Maintain Safe Shutdown  Operating Modes: ALL  Fire or explosion in any of the following areas: <ul style="list-style-type: none"><li>Reactor, Turbine, Control, Admin/Security</li><li>Intake structure</li><li>Pump house</li></ul> AND Affected system parameter indications show degraded performance or plant personnel report VISIBLE DAMAGE to permanent structures or equipment within the specified area.	<table><tr><th colspan="4">Water Level Operating Limits</th></tr><tr><th>Room Area</th><th>Indicator</th><th>Max Normal Operating Limit (inches)</th><th>Max Safe Operating Limit (inches)</th></tr><tr><td>HPCI Room Area</td><td>LI 3768</td><td>2</td><td>6</td></tr><tr><td>RCIC Room Area</td><td>LI 3769</td><td>3</td><td>6</td></tr><tr><td>A RHR Corner Room SE Area</td><td>LI 3770</td><td>2</td><td>10</td></tr><tr><td>B RHR Corner Room NW Area</td><td>LI 3771</td><td>2</td><td>10</td></tr><tr><td>Torus Area</td><td>LI 3772</td><td>2</td><td>12</td></tr></table>		Water Level Operating Limits				Room Area	Indicator	Max Normal Operating Limit (inches)	Max Safe Operating Limit (inches)	HPCI Room Area	LI 3768	2	6	RCIC Room Area	LI 3769	3	6	A RHR Corner Room SE Area	LI 3770	2	10	B RHR Corner Room NW Area	LI 3771	2	10	Torus Area	LI 3772	2	12
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OTHER HAZARDS AND FAILURES	<b>HU3</b> Release of Toxic or Flammable Gases Deemed Detrimental to Safe Operation of the Plant  Operating Modes: ALL  Report or detection of toxic or flammable gases that could enter within the site area boundary in amounts that can affect normal operation of the plant. OR Report by local, county or State official for potential evacuation of site personnel based on offsite event.	<b>HA3</b> Release of Toxic or Flammable Gases Within a Facility Structure Which Jeopardizes Operation of Systems Required to Maintain Safe Operations or to Establish or Maintain Cold Shutdown  Operating Modes: ALL  Report or detection of toxic gases within a Safe Shutdown Area in concentrations that will be life threatening to plant personnel. OR Report or detection of flammable gases within a Safe Shutdown Area in concentrations that will affect the safe operation of the plant.	<table><tr><th colspan="2">Systems &amp; Areas of Concern</th></tr><tr><td colspan="2"><ul style="list-style-type: none"><li>Reactivity Control</li><li>Containment (Drywell/Torus)</li><li>RHR/Core Spray/SRVs</li><li>HPCI/RCIC</li><li>RHRSW/River Water/ESW</li><li>Onsite AC Power/EDGs</li><li>Offsite AC Power</li><li>Instrument AC</li><li>DC Power</li><li>Remote Shutdown Capability</li></ul></td></tr></table>		Systems & Areas of Concern		<ul style="list-style-type: none"><li>Reactivity Control</li><li>Containment (Drywell/Torus)</li><li>RHR/Core Spray/SRVs</li><li>HPCI/RCIC</li><li>RHRSW/River Water/ESW</li><li>Onsite AC Power/EDGs</li><li>Offsite AC Power</li><li>Instrument AC</li><li>DC Power</li><li>Remote Shutdown Capability</li></ul>																									
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SECURITY	<b>HU4</b> Confirmed Security Event Which Indicates a Potential Degradation in the Level of Safety of the Plant  Operating Modes: ALL  Suspected sabotage device discovered within plant Protected Area. OR Suspected sabotage device discovered outside the outside the Protected Area in the plant switchyard or ISFSI. OR Confirmed tampering with safety related equipment. OR A hostage situation that disrupts normal plant or ISFSI operations. OR Civil disturbance OR strike which disrupts normal plant or ISFSI operations. OR Internal disturbance that is not short lived or that is not a harmless outburst involving one or more individuals within the Protected Area or ISFSI. OR Credible Security Threat of "LO" Severity	<b>HA4</b> Confirmed Security Event in a Plant Protected Area  Operating Modes: ALL  Intrusion into plant Protected Area by a hostile force. OR Sabotage device discovered in the plant Protected Area. OR Any security event of increasing severity that persists for ≥ 30 minutes: <ul style="list-style-type: none"><li>Credible bomb threats</li><li>Extortion</li><li>Suspicious Fire or Explosion</li><li>Significant Security System Hardware Failure</li><li>Loss of Guard Post Contact</li></ul> OR Credible Security Threat of "HI" Severity	<b>HS1</b> Confirmed Security Event in a Plant Vital Area  Operating Modes: ALL  Intrusion into plant Vital Area by a hostile force. OR A security event that results in the loss of control of any Vital Areas (other than the control room) OR IMMINENT loss of physical control of the facility (remote shutdown capability) due to a security event. OR A confirmed sabotage discovered in a Vital Area.	<b>HG1</b> Security Event Resulting in Loss of Ability to Reach and Maintain Cold Shutdown  Operating Modes: ALL  Loss of physical control of the Control Room due to security event. OR Loss of physical control of remote shutdown capability due to security event.																												
	CONTROL ROOM EVACUATION	None	<b>HA5</b> Control Room Evacuation Has Been Initiated  Operating Modes: ALL  Entry into AOP 915 and initiation of control room evacuation.	<b>HS2</b> Control Room Evacuation Has Been Initiated and Plant Control Cannot Be Established  Operating Modes: ALL  Control Room evacuation has been initiated. AND Control of the plant cannot be established per AOP 915 within 20 minutes.	None																											
EMERGENCY DIRECTOR JUDGMENT	<b>HU5</b> Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of an Unusual Event  Operating Modes: ALL  Other conditions exist which in the judgment of the Emergency Director indicate that events are in process or have occurred which indicate a potential degradation of the level of safety of the plant. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.	<b>HA6</b> Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of an Alert  Operating Modes: ALL  Other conditions exist which in the judgment of the Emergency Director indicate that events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.	<b>HS3</b> Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of a Site Area Emergency  Operating Modes: ALL  Other conditions exist which in the judgment of the Emergency Director indicate that events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public. Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels beyond the site boundary.	<b>HG2</b> Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of a General Emergency  Operating Modes: ALL  Other conditions exist which in the judgment of the Emergency Director indicate that events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.																												