

ATTACHMENT 1

Response to the Request for Additional Information - License Amendment Request to
Adopt Emergency Action Level Schemes Pursuant to NEI 99-01, Revision 6,
"Development of Emergency Action Levels for Non-Passive Reactors"

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Response to Request for Additional Information
License Amendment Request to Adopt Emergency Action Level Schemes Pursuant to NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors"

By letter dated May 30, 2014 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a license amendment request to support changes to the Emergency Plans for the facilities listed above. Specifically, the proposed changes involve revising the Emergency Plans for the affected facilities to adopt the Nuclear Energy Institute's (NEI's) revised Emergency Action Level (EAL) schemes described in NEI 99-01, Revision 6, *"Development of Emergency Action Levels for Non-Passive Reactors,"* which have been endorsed by the NRC as documented in an NRC letter dated March 28, 2013 (Reference 3).

10 CFR 50, Appendix E, Section IV.B.2 stipulates that a licensee desiring to change its entire EAL scheme shall submit an application for an amendment to its license and receive NRC approval before implementing the change. Exelon's currently approved Emergency Plan EAL schemes are based on the guidance established in NEI 99-01, Revision 5, *"Methodology for Development of Emergency Action Levels."* Exelon is proposing to adopt the EAL schemes based on the latest NRC-endorsed guidance, which are described in NEI 99-01, Revision 6.

Subsequently, in an electronic mail request dated November 11, 2014 (Reference 2), the NRC indicated that it had reviewed the information submitted in the Reference 1 letter. The NRC identified a number of preliminary questions concerning the proposed EAL changes and requested additional clarifying information to support its continued review. The preliminary questions in Reference 2 were further discussed during teleconferences a December 2, 2014, and January 8, 2015, between Exelon and NRC representatives. The preliminary questions in Reference 2 are identified below followed by Exelon response.

Question 1

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
1	Various	Various	Braidwood Byron Clinton Dresden LaSalle Limerick Peach Bottom Oyster Creek Quad Cities TMI	Section 4.3, "Instrumentation Used for EALs," to NEI 99-01, Revision 6, states that "Scheme developers should ensure that specific values used as EAL setpoints are within the calibrated range of the referenced instrumentation...EAL setpoint values should not use terms such as 'off-scale low' or 'off-scale high' since that type of reading may not be readily differentiated from an instrument failure." Confirm that all setpoints and

				<p><i>indications used in the EAL scheme are within the calibrated range(s) of the stated instrumentation and that the resolution of the instrumentation is appropriate for the setpoint/indication.</i></p> <p><i>Also, confirm that the EAL Basis Document states that it must be maintained in accordance with 10 CFR 50.54(q).</i></p>
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Response

Exelon has documented its verification of the radiation monitoring equipment and associated ranges against the EAL thresholds in Issue Report (IR) 1481380.

The balance of the instrumentation used in the proposed EAL schemes have the appropriate calibrated range and resolution with regard to the thresholds they are intended to indicate.

The EAL Basis Document is contained in each affected site's Emergency Plan Annex and is maintained in accordance with the Standard Emergency Plan (i.e., EP-AA-1000, Section P.4) as stated below:

"The E-Plan and its Annexes shall be revised as needed and the most current approved revisions shall remain in effect so long as they are certified as current. Revisions to the E-Plan are reviewed by the Stations' Plant Operational Review Committee (PORC) prior to approval. Changes to the plan are made without NRC approval only if such changes do not result in a reduction in effectiveness of the plan per 10 CFR 50.54(q), and the plan as changed continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. Proposed changes that reduce or have a potential to reduce the effectiveness of the approved plan are not implemented without prior approval by the NRC."

Question 2

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
2	AA2 AS2 AG2	RA2 AS2 AG2	Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI	Provide the spent fuel instrumentation EALs based upon NRC Order-EA-12-051. It is understood that implementation of the EALs related to spent fuel, based upon the NRC Order, will be after implementing the order, however, the staff will review these EALs now and list them for future implementation.

Response

Each site's proposed EAL schemes contain the associated EALs RG2, RS2, and additional RA2 threshold values related to the enhanced Spent Fuel Pool (SFP) level instrumentation/ indicators being installed per NRC Order EA-12-051, "*Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*," dated March 12, 2012. These EALs will be incorporated into each of the affected site's EAL schemes when the enhanced SFP level instrumentation is available for use, in accordance with the implementation criteria specified in Order EA-12-051.

Question 3

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
3	SU3	RU3	Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI	Explain why the paragraph excluding this EAL based upon laboratory confirmation was added to the basis section as this is not from the endorsed guidance. Provide justification or revise accordingly.

Response

The following paragraph has been removed from all of the affected sites' EAL Basis section for RU3:

"An Unusual Event is only warranted when actual fuel clad damage is the cause of the elevated coolant sample activity (as determined by laboratory confirmation). Fuel clad damage should be assumed to be the cause of elevated Reactor Coolant activity unless another cause is known."

Question 4

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
4	FB Matrix	RC1	Braidwood Byron	Explain, in more detail, why the term "leakage" was replaced with the term "rupture" in Potential Loss 2.b, or revise accordingly.

Response

The word "*RUPTURE*" has been replaced with the word "*leakage*" in Braidwood and Byron Fission Product (FP) Barrier Matrix for EAL RC1, Potential Loss 2.b.

Question 5

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
5	CU3 CA3	CU5 CA5	Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI	<i>Explain why language was added to the EALs related to the loss of decay heat removal event? The endorsed guidance states: "This IC addresses conditions involving a loss of decay heat removal capability OR [emphasis added] an addition of heat to the RCS in excess of that which can currently be removed." Provide additional justification, or revise accordingly.</i>

Response

The following statement has been removed from the description in EALs CU5 and CA5:

"...due to loss of decay heat removal...."

In addition, the following *Note* has been added to the EAL. This will allow the information to be located in the Procedure Matrix (i.e., 11 x 17 table) for EALs CU5 and CA5 in order to facilitate a quick reference by the Shift Manager (SM) / Emergency Director (ED):

"Note: A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification."

Question 6

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
6	CG1	CG6	Braidwood Byron TMI	<i>The endorsed IC has only 2 EALs, the proposed IC has more. Explain how the proposed EAL will not create a DEVIATION with the endorsed guidance, i.e., will result in the same classifications within the same time periods as what is</i>

				<i>endorsed. Provide justification or revise accordingly.</i>
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Response

The proposed EAL CG6 has been revised for the affected sites to address the identified inconsistency associated with the Initiating Conditions (ICs). The EAL now contains EAL 1 a. and b., and EAL 2 a., b. (which include three bullets), and c. This coincides with the endorsed NEI 99-01, Revision 6, EAL CG1 IC guidance. There was no change in content to the proposed EAL.

Question 7

<i>RAI #</i>	<i>NEI EAL #</i>	<i>EXELON EAL #</i>	<i>Applicable Sites</i>	<i>RAI</i>
7	HU4	HU3	Braidwood Byron Dresden LaSalle Limerick	<i>Explain why the ISFSI was not included in this EAL. The deletion was not addressed in the justification matrix?</i>

Response

The Comparison Matrix has been revised to reflect that the ISFSI is within the plant PROTECTED AREA and is not specifically contained within the description for EAL 3 and 4.

In addition, the following sentence has been added to the Basis section for the associated EALs 3 and 4.

"ISFSI is not specifically addressed in EAL #3 and #4 since it is within the plant PROTECTED AREA."

Furthermore, Oyster Creek has been added as an applicable site for this EAL since the ISFSI is also located within the PROTECTED AREA.

Question 8

<i>RAI #</i>	<i>NEI EAL #</i>	<i>EXELON EAL #</i>	<i>Applicable Sites</i>	<i>RAI</i>
8	HS6	HS2	Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek	Explain whether Operating Mode specificity would be appropriate for Table H1, "Safety Functions." Provide justification and revise as appropriate.

			<i>Peach Bottom Quad Cities TMI</i>	
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Response

Exelon does not consider it necessary to include Operating Modes in this proposed EAL, and therefore, will not be revising Table H1 to include the Mode applicability information. This approach is consistent with the NRC-approved guidance in NEI 99-01, Revision 6.

Question 9

<i>RAI #</i>	<i>NEI EAL #</i>	<i>EXELON EAL #</i>	<i>Applicable Sites</i>	<i>RAI</i>
9	HU2	HU4	<i>Braidwood Byron LaSalle Limerick Peach Bottom TMI</i>	<i>Provide more detail as to where the stated panel is located and how this event is declared within the appropriate timeframe.</i>

Response

Exelon has provided additional detail related to the cited EAL (HU4) for the referenced sites on where the stated panel is located and how this event is declared within the appropriate timeframe. This information is listed in each sites' Comparison Matrix under the HU4 justification column.

Question 10

<i>RAI #</i>	<i>NEI EAL #</i>	<i>EXELON EAL #</i>	<i>Applicable Sites</i>	<i>RAI</i>
10	HA5	HA5	<i>Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI</i>	<i>The areas listed in Table H-3 are only applicable in certain modes, yet the applicability of this EAL is to all operating modes. Explain the discrepancy or revise accordingly.</i>

Response

Exelon has revised the Operating Mode Applicability to agree with Table H-3.

In addition, the following statement has been added to the applicable Basis section to provide further clarification:

"The Operating Mode Applicability of this EAL has been revised from All Modes to Modes [site-specific information] due to the Mode Applicability of the areas of concern in Table H-3. In the future should the areas of concern in Table H-3 be revised then the Operating Mode Applicability of this EAL should be reevaluated."

Question 11

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
11	HU3	HU6	Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI	Explain the added wording to HU6.2's basis information. This wording exempts leakage events that cause the manual isolation of power to safety system components, which is not the intent of this EAL. Provide justification or revise accordingly.

Response

Exelon has removed the following statement from the HU6.2 Basis section:

"Manual isolation of power to a SAFETY SYSTEM component as a result of leakage is an event of lesser impact and would be expected to cause small and localized damage. The consequence of this type of event is adequately assessed and addressed in accordance with Technical Specifications."

Question 12

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
12	SG1 SS1 SA1 SG8	MG1 MS1 CA1 MG2	Clinton LaSalle	Explain, in more detail why Division III electrical busses were excluded from consideration for this EAL, or revise accordingly.

Response

Exelon has added additional information and detail to the Comparison Matrix in the associated EAL Justification column. The information clarifies why the Division III electrical buses were excluded from consideration for these EALs. The clarifying information is as follows:

"Division 3 equipment is excluded since the site only powers Division 3 equipment from the Division 3 bus, which means just the High Pressure Core Spray System. This system on its own is not considered to be a full ECCS train and cannot be credited as enough restoration of power to have an equivalent ECCS bus restored."

Question 13

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
13	SU6 CU5	MU7 CU4	Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI	A. Explain why sound-powered phones are considered a viable communications method for the onsite ERO, or revise accordingly. B. If applicable, explain how the use of satellite communication methods can be a viable in-plant (on-site) method.

Response

Exelon has removed references to Sound-Powered and Satellite phones from the list of onsite communication methods under each affected sites' MU7 and CU4 EALs.

Question 14

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
14	CU2	CU1	Clinton	Explain why the defueled operating mode is not applicable to this EAL, or revise accordingly.

Response

Exelon has revised the associated EAL for Clinton to add "Defueled (D)" to the Operating Mode Applicability.

Question 15

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
15	AA3 HA5	RA3 HA5	Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI	<p>A. Confirm that the stated areas are limited to those where access is required to operate equipment necessary for normal operations, safe shutdown, and cooldown. Areas that do not contain equipment requiring local operation should not be reflected in this EAL.</p> <p>B. In addition, confirm that the EAL basis reflects that equipment needed for normal operation, safe shutdown, and cooldown is the concern of this EAL.</p>

Response

- A) Exelon has revised each applicable site's Mode Dependent Area Tables in EALs RA3 and HA5 to ensure that the stated areas are limited to those areas where access is required to operate equipment necessary for normal operations, safe shutdown, and cooldown. Areas that do not contain equipment requiring local operation are no longer reflected in these Tables.
- B) Exelon has also added the following highlighted statement to each affected sites' Basis section for the associated EALs to ensure that the description related to the equipment for normal operation, safe shutdown, and cooldown is the concern for this EAL:

"Assuming all plant equipment is operating as designed, Normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR; therefore, Table [site-specific information] is a list of plant rooms or areas with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal operating procedures (establish shutdown cooling), where if this action is not completed the plant would not be able to attain and maintain cold shutdown."

In addition to adding highlighted statement, the Basis section for HA5 for Peach Bottom also includes a reference to the Main Control Room as noted below:

"Assuming all plant equipment is operating as designed, Normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR; therefore, Table H3 is a list of plant rooms or areas, in addition to the MCR, with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal operating procedures"

(establish shutdown cooling), where if this action is not completed the plant would not be able to attain and maintain cold shutdown."

Question 16

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
16	SG1 SS1 SA1 SU1 SG8 CA2 CU2	MG1 MS1 MA1 MU1 MG2 CA1 CU1	Dresden LaSalle Quad Cities TMI	<i>Explain, in more detail, if ECCS buses are the same as VITAL buses, or revise accordingly. Also, provide information regarding the availability of the SBO diesel generators to allow consideration as a power source for the purposes of this EAL.</i>

Response

Emergency Core Cooling System (ECCS) buses are site-specific terms and they are the same meaning as Vital buses, in that they supply power to the electrical distribution system that powers Safety Systems.

Dresden: ECCS Bus and SBO DG 2(3)

From the Dresden USFAR Section 9.5.9

"Two SBO diesel generators are installed at Dresden. The capacity of each of these generators is 4350 kw continuous, with a 2000-hour rating of 4785 kw. This capacity is sufficient to power one division of safe shutdown loads needed in dealing with a station blackout event. Although not normally connected to any bus, the configuration of the SBO 4 kv distribution system allows connection of each SBO DG to any of the four safety-related emergency buses. During emergency conditions, Bus 23-1(33-1) or 24-1(34-1) will then be connected to the SBO DG. If conditions require, the safety related cross-tie between Bus 23-1 and 33-1 or between 24-1 and 34-1 can be utilized so that the Unit 2 SBO DG can supply power to Unit 3 loads and vice versa. The SBO system is designed to provide remote operations from the main control room. These operations include start and control of the diesel generators and auxiliaries, manipulation of the 4 kv connections, and loading of the diesel generators."

The Station Blackout (SBO) Emergency Diesel Generator (EDG) undergoes comprehensive testing and preventive maintenance in accordance with the stations established maintenance program.

LaSalle: ECCS Bus and Shared Emergency DG 0, LaSalle Station EALs do not take credit for a SBO DG.

From LaSalle UFSAR Section 8:

"The standby a-c power system consists of five diesel-generator sets for both reactor/turbine-generator units. One of the diesel sets is shared between Unit 1 and Unit 2 (Figures 8.1-2 and 8.1-3).

Each diesel generator can be started manually either by a control switch located on the main control board or by a control switch located on the separate local control panel of the diesel generator (NOTE: diesel generator "O" has a control switch on both U-1 MCB and U-2 MCB). Diesel generators 1B and 2B are each furnished with a two-position selector switch ("remote" and "local") located at the remote control station in the control room.

In addition to the periodic testing, each diesel generator undergoes a comprehensive functional test during refueling outages. This functional testing checks diesel starting, closure of the diesel breakers, and sequencing of loads on the diesel. During testing the diesel is started by a signal simulating a loss-of-coolant accident. In addition, an undervoltage condition is imposed to simulate a loss of offsite power. The timing sequence is checked to assure proper loading in the time. The diesel generators are tested every 24 months for 2 hours at 110% of the continuous rating which demonstrates the diesel generator can perform acceptably at the slightly higher than rated load. Periodic testing of the diesel and its various components plus a functional test at refueling intervals is used to demonstrate adequate reliability."

Quad Cities: ECCS Bus and SBO DG

From Quad Cities UFSAR:

8.3.1.9 Station Blackout Diesel Generator System

"In response to the Station Blackout (SBO) Rule, ComEd committed to install a "fully capable" alternate AC (AAC) system. This system would consist of a standby diesel generator, available within one hour of the onset of an SBO event, controllable from the main control room, and connectable to all safety buses (Bus 13-1 and 14-1). The "fully-capable" designation and the fact that the SBO diesels are larger than the emergency DGs (per unit basis), allows: (1) all diesels (SBO DGs and emergency DGs) to be maintained at a reduced reliability factor of 0.95 and (2) a reduction of demonstrable AC-independent coping ability from four hours to one hour. The SBO DG safe shutdown function is described in the Safe Shutdown Report (FPR Volume 2). The following function and component descriptions are for the Unit 1 system. Configuration and capability of the Unit 2 system is similar.

Design of the SBO system was based on Appendix B of NUMARC 87-00, which was developed as an NRC-approved guideline to utilities to determine station-specific requirements for meeting the station blackout rule. The design, installation, testing and maintenance of the SBO system and components are in compliance with the requirements of Regulatory Guide 1.155, "Station Blackout." Compliance with the

Regulatory Guide is accomplished through approved plant procedures and other administrative controls.

The SBO system is a non-class 1E, independent source of additional on-site emergency AC power. The system consists of two diesel-driven generator sets, each having a continuous rating of 4350 kW at 4160 V at a power factor of 0.8. The 2000-hour/year rating is 4785 kW. Each generator is connectable, but not normally connected, to the safe shutdown equipment on one nuclear unit, but can also be connected to the opposite unit via the safety-related 4kV cross-ties. The SBO DGs must be manually started and manually connected to the appropriate safe shutdown loads. The start and load functions of the SBO DG can be performed from the main control room."

TMI: Emergency 4KV Bus and EG-Y-4 SBO

The alternate AC power source capability is provided by the Station Blackout (SBO) diesel generator (i.e., once was one of the TMI-2 emergency diesel generators).

From TMI-1 UFSAR Section 8.5, Station Blackout Evaluation:

"An alternate AC power source is utilized at TMI-1. The alternate AC power source meets the criteria specified in Appendix B of NUMARC 87-00"

and

"The alternate AC power source has been designed so that it will be available within ten minutes of the onset of the station blackout event, and it has sufficient capability and capacity to operate systems necessary for coping with a station blackout for the required station blackout duration of four hours to bring the plant to, and maintain it, in safe shutdown condition. The alternate AC power source will be manually started from the TMI-1 Control Room. Circuit breakers necessary to bring power to a safe shutdown bus are capable of being actuated in the Control Room within that period. The alternate AC power source will not automatically load safe shutdown equipment on the ES bus; manual loading will be employed. Once the alternate AC power source is providing power to 4 kV ES Bus 1E or 1D, the operator actions are essentially identical to that under a loss of offsite power with only one emergency diesel generator operating, except for restoration of offsite power."

and

"Alternate AC Testing

- Every refuel period one safe shutdown bus (1D or 1E) will be tested during alternative refuel periods. Testing will verify the capability of the alternate AC power source to provide power to the selected safe shutdown bus."*

Additionally, the SBO diesel is run quarterly to demonstrate operability and reliability in accordance with NSAC-108.

Question 17

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
17	SA9	MA5	Oyster Creek	Explain, in more detail, why a

	CA6	CA2		<i>threshold was developed for a manual scram due to a seismic event, or revise accordingly.</i>
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Response

Exelon has removed the threshold for a manual scram due to a seismic event from EALs MA5 and CA2.

Question 18

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
18	HU2	HU4	Oyster Creek	<i>The endorsed guidance provides an alternative EAL for sites with limited seismic monitoring capability. Explain, in more detail, why this EAL was developed this way, or revise accordingly.</i>

Response

Exelon has revised the EAL (HU4) for Oyster Creek accordingly. The revised EAL makes use of the guidance described in Appendix A, "Interim Operating Basis Earthquake Exceedance Guidelines," of Regulatory Guide (RG) 1.166, "Pre-earthquake Planning and Immediate Nuclear Power Plant Operator Postearthquake Actions," dated March 1997. Appendix A of RG 1.166 provides guidance to plants without Operating Basis Earthquake (OBE) seismic detection related to applicable OBE determination. The revised HU4 EAL ensures that the Shift Manager (SM) / Emergency Director (ED) will make a timely determination by placing a 15-minute clock on the ability to gain additional information.

Note: The associated EALs for the other plants have also been revised similarly to reflect this change. The changes for the other plants are discussed below (see "Additional Changes" section).

Question 19

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
19	FP Matrix	RC1	TMI	<i>Explain why the criteria from the endorsed guidance, "Loss: RCS leakage results in <25 °F sub-cooled margin," was not developed for this fission barrier matrix, or revise accordingly.</i>

Response

Exelon has revised the Fission Product Barrier Matrix to reflect: *"Loss: RCS leakage results in <25 °F sub-cooled margin."* This threshold is in alignment with the latest NRC-approved B&W EALs crafted to meet Westinghouse EAL Guidance in NEI 99-01.

Question 20

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
20	FP Matrix	RC2	TMI	<i>With the method chosen to develop criteria RC1, criteria RC2 are redundant. Explain the impact this may have on EAL decision making, or revise accordingly.</i>

Response

Exelon has revised the EAL RC1 to remove the reference to *"HPI-PORV Cooling in effect"* in the Basis section.

Question 21

RAI #	NEI EAL #	EXELON EAL #	Applicable Sites	RAI
21	FP Matrix	CT1 CT4	TMI	<i>Explain and justify why the developed criteria are different than what was previously approved by the NRC, or revise accordingly.</i>

Response

Exelon has revised the Fission Product Barrier Matrix to reflect the latest NRC-approved B&W EALs crafted to meet Westinghouse EAL Guidance in NEI 99-01, with the exception of CT1 (*SG tube leakage > 150gpm*). In CT1, Loss 1.A - leakage of 150 gpm, was selected based on the following:

In order to be in the Fission Product Barrier Matrix Table in Revision 6 of the NEI 99-01 guidance, there must be a Loss or Potential Loss of the Reactor Coolant System (RCS) or Fuel Clad (FC) barriers; this makes the Containment (CT) barrier an escalation only barrier. MU8 was developed in NEI 99-01, Revision 6 as the loss of containment Unusual Event (UE), replacing the FU1 EAL in Revision 5 of NEI 99-01. Tube leakage below 150 gpm is classified in accordance with NEI 99-01, Revision 6 EAL MU6 for RCS leakage. To enter the Fission Product Barrier Matrix Table, the plant would need to experience a Reactor Coolant System (RCS) leakage rate greater than the capacity of a makeup pump. For TMI this is 150 gpm. If this is occurring, the Matrix Table is entered for a Potential Loss of the RCS. Further, if the RCS leakage being experienced is via a Steam Generator (SG) tube leak and there is unisolable steam leakage to the

Fission Product Barrier Matrix				Hot Matrix										
GENERAL EMERGENCY			SITE AREA EMERGENCY		ALERT									
FG1 Loss of any two barriers AND Loss or Potential Loss of third barrier. 1234			FS1 Loss or Potential Loss of ANY two barriers. 1234		FA1 ANY Loss or ANY Potential Loss of either Fuel Clad or RCS 1234									
Sub-Category	FC – Fuel Clad		RC – Reactor Coolant System		CT - Containment									
	Loss	Potential Loss	Loss	Potential Loss	Loss	Potential Loss								
1. RCS or SG Tube Leakage	None	1. RCITS hot leg instruments indicate 0 inches after lowering trend. AND 2. In-core thermocouples are unavailable. AND 3. ALL RCP's are secured.	1. RCS leakage results in <25° Sub Cooling Margin OR 2. Steam Generator tube RUPTURE that requires/ results in an ESAS actuation.	3. UNISOLABLE RCS leakage > 150gpm. OR 4. a. RCS Pressure > 2450 psig. AND b. RCS Pressure not lowering.	1. SG tube leakage > 150gpm AND 2. UNISOLABLE steam release from affected S/G to the environment	None								
2. Inadequate Heat Removal	1. T _{clad} > 1400°F	2. > 25°F Superheat OR 3. HPI-PORV Cooling in effect.	None	HPI-PORV Cooling in effect.	None	1. T _{clad} ≥ 1800°F. AND 2. EOP Restoration procedures <u>not</u> effective in < 15 minutes.								
3. Containment Radiation / RCS Activity	1. Containment radiation monitor (RM-G-22 or RM-G-23) reading > 1.95E+03 R/hr. OR 2. Coolant activity > 300uCi/gm Dose Equivalent I-131	None	Containment radiation monitor (RM-G-22 or RM-G-23) reading > 25 R/hr.	None	None	Containment radiation monitor (RM-G-22 or RM-G-23) reading > 4.40E+03 R/hr.								
4. Containment Integrity or Bypass	None	None	None	None	1. Containment isolation is required and ANY of the following: a. UNPLANNED lowering in containment pressure following initial pressure rise OR b. Containment pressure or water level response <u>not</u> consistent with LOCA conditions. OR c. UNISOLABLE pathway from containment to the environment exists. OR 2. Indication of RCS leakage outside of containment.	3. Reactor Building Pressure > 55 psig and rising. OR 4. Hydrogen Concentration in Containment ≥ 4%. OR 5. a. Reactor Building pressure > 30 psig AND b. Reactor Building Emergency cooling is less than ANY one of the following conditions: <table><tr><td>SPRAY</td><td>COOLERS</td></tr><tr><td>2</td><td>0</td></tr><tr><td>0</td><td>3</td></tr><tr><td>1</td><td>1</td></tr></table>	SPRAY	COOLERS	2	0	0	3	1	1
SPRAY	COOLERS													
2	0													
0	3													
1	1													
5. Emergency Director Judgment	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.								

environment from that SG, then an immediate escalation to a Site Area Emergency (SAE) is warranted based on the Potential Loss of the RCS barrier and the Loss of the Containment barrier. This Loss of the Containment barrier would not be considered in the Fission Product Barrier Matrix at SG leakage rates less than 150 gpm since below this level of RCS leakage you would not be in the Fission Product Barrier Matrix Table. A copy of the revised Fission Product Barrier Matrix Table is also attached for reference.

Question 22

<i>RAI #</i>	<i>NEI EAL #</i>	<i>EXELON EAL #</i>	<i>Applicable Sites</i>	<i>RAI</i>
22	CG1 CS1 CA1 CU1	CG6 CS6 CA6 CU6	Braidwood Byron Clinton Dresden LaSalle Limerick Oyster Creek Peach Bottom Quad Cities TMI	<i>Explain, in more detail, why the RCS level threshold was changed from "cannot be monitored" to "unknown" as this could potentially change the timing of the EAL declaration, or revise accordingly.</i>

Response

Exelon has revised the Basis Sections for the cited EALs to return the wording to "cannot be monitored."

Additional Proposed Minor Changes

1. In addition to Oyster Creek, Exelon is proposing to revise EAL HU4 for all of the affected sites to take advantage of the Developer Guidance in NEI 99-01, Revision 6. Specifically, an alternate EAL threshold when the seismic detection equipment is unavailable has been added. The revised EAL will make use of information contained in RG 1.166, "Pre-earthquake Planning and Immediate Nuclear Power Plant Operator Postearthquake Actions," Appendix A, "Interim Operating Basis Earthquake Exceedance Guidelines." In particular, Exelon is proposing to include guidance in the EAL when OBE seismic detection capability is not available to aid in making an applicable OBE determination. The revised HU4 EAL ensures that the SM/ED will make a timely determination by use of a 15-minute clock.
2. Added the following wording to the Basis sections for the EALs identified below for Clinton and Dresden in response to recent operating experience related to Susquehanna (i.e., NRC Problem Identification and Resolution Inspection Report and Notice of Violation 05000387/2014009 and 05000388/2014009, dated August 1, 2014):

Clinton RC4:

"Max Norm Radiation values are obtained by survey through the implementation of the Emergency Operating Procedures (EOPs) for determining unisolable RCS leakage;

these values should only be used for determination of the EAL if they are available in a timely manner.”

Clinton CT6:

“Max Safe Radiation values are obtained by survey through the implementation of the Emergency Operating Procedures (EOPs); these values should only be used for determination of the EAL if they are available in a timely manner.”

Dresden CT6:

“Max Safe Radiation values are obtained by survey through the implementation of the Emergency Operating Procedures (EOPs); these values should only be used for determination of the EAL if they are available in a timely manner.”

3. Added the following wording to the Basis sections for each site’s EALs to further clarify leak unisolability:

Plants	EALs
Braidwood, Byron, and Three Mile Island	RC1, CT4, and MU6
Clinton, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom and Quad Cities	RC4, CT6, and MU6

“Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.”

4. Added the following **Note** to CA2 and MA5 for each site, to more easily direct the Operator to associated ICs since they are located in different sections:

Note:

- *If it is determined that the conditions of MA5 (CA2) are not met then assess the event via HU3, HU4, or HU6.*

5. Added the following **Note** to HU3, HU4 and HU6 for each site, to more easily direct the Operator to associated ICs since they are located in different sections.

Note:

- *Escalation of the emergency classification level would be via IC CA2 or MA5*

6. In EAL RU1 for Byron, the phrase “Alarm Set Point” has been replaced with the phrase “High Alarm Set Point.” The monitors contain two alarm set points for this EAL: an “Alarm Set Point” and a “High Alarm Set Point.” The “High Alarm Set Point” is the appropriate designation.
7. Exelon is also proposing changes in the Basis section wording for EAL RC4 for Clinton to be consistent with a Mark III containment design as follows:

From:

In general, multiple indications should be used to determine if a primary system is discharging outside Primary Containment. For example, a high area radiation condition does not necessarily indicate that a primary system is discharging into the **Reactor Building** since this may be caused by radiation shine from nearby steam lines or the movement of radioactive materials. Conversely, a high area radiation condition in conjunction with other indications (e.g. room flooding, high area temperatures, reports of steam in the **Reactor Building**, an unexpected rise in Feedwater flowrate, or unexpected Main Turbine Control Valve closure) may indicate that a primary system is discharging into the **Reactor Building**.

To:

In general, multiple indications should be used to determine if a primary system is discharging outside Primary Containment. For example, a high area radiation condition does not necessarily indicate that a primary system is discharging **outside Primary Containment** since this may be caused by radiation shine from nearby steam lines or the movement of radioactive materials. Conversely, a high area radiation condition in conjunction with other indications (e.g. room flooding, high area temperatures, reports of steam in **Secondary Containment**, an unexpected rise in Feedwater flowrate, or unexpected Main Turbine Control Valve closure) may indicate that a primary system is discharging **outside Primary Containment**.

8. Exelon is also proposing adding the following highlighted additional clarifying information for the Mark III containment specific example in the Basis section for EAL CT6 for Clinton:

*"Venting for primary containment pressure control when not in an accident situation (e.g., to control pressure below the Drywell high pressure scram setpoint or **Continuous Containment Purge** operating as designed, below isolation setpoints) does not meet the threshold condition."*

References

- 1) Letter from James Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission - License Amendment Request to Adopt Emergency Action Level Schemes Pursuant to NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," dated May 30, 2014 (ML14164A054)
- 2) U.S. Nuclear Regulatory Commission Electronic Mail Preliminary Request for Information Regarding Emergency Action Level Fleet Amendments, dated November 11, 2014
- 3) Letter from Mark Thaggard (U.S. Nuclear Regulatory Commission) to Susan Perkins-Grew (Nuclear Energy Institute) - U.S. Nuclear Regulatory Commission Review and Endorsement of NEI 99-01, Revision 6, November 2012, dated March 28, 2013
- 4) RIS 2005-02, Revision 1, "Clarifying the Process for Making Emergency Plan Changes," dated August 19, 2011

- 5) NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," dated November 2012
- 6) RIS 2003-18, "Use of NEI 99-01, Methodology for Development of Emergency Action Levels," dated October 8, 2003
- 7) RIS 2003-18, Supplement 1, "Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels," dated July 13, 2004
- 8) RIS 2003-18, Supplement 2, "Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels," dated December 12, 2005

ATTACHMENT 2

REVISED RADIOLOGICAL EMERGENCY PLAN ANNEX INFORMATION

FOR

BRAIDWOOD STATION

EP-AA-1001

Enclosures

- Enclosure 2A – Revised EAL Comparison Matrix Document
- Enclosure 2B – Revised EAL Red-Line Basis Documents
- Enclosure 2C – Revised EAL Basis Documents

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AG1</p> <p>Initiating Condition – GENERAL EMERGENCY</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. Reading on any of the following radiation monitors greater than the reading shown for 15 minutes or longer:</p> <p>(site specific monitor list and threshold values)</p> <p>2. Dose assessment actual meteorology indicates doses greater than 1000 mrem TEDE or 5000 mrem thyroid CDE at or beyond (site specific dose receptor point)</p> <p>3. Field survey results indicate EITHER of the following at or beyond (site specific dose receptor point):</p> <ul style="list-style-type: none"> Closed window dose rates greater than 1000 mR/hr expected to continue for 60 minutes or longer. Analysis of field survey samples indicate thyroid CDE greater than 5000 mrem for one hour of inhalation. 	<p style="text-align: right;">RG1</p> <p>Initiating Condition:</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mRem TEDE or 5,000 mRem thyroid CDE.</p> <p>Operating Mode Applicability:</p> <p>1,2,3,4,5,6,D</p> <p>Emergency Action Levels (EAL) :</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > 3.87 E+09 µCi/sec for ≥ 15 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).</p> <p>OR</p> <p>2. Dose assessment Using actual meteorology indicates doses at or beyond the site boundary of EITHER:</p> <p style="padding-left: 40px;">a. > 1000 mRem TEDE</p> <p style="text-align: center;">OR</p> <p style="padding-left: 40px;">b. > 5000 mRem CDE Thyroid</p> <p>OR</p> <p>3. Field survey results at or beyond the site boundary indicate EITHER:</p> <p style="padding-left: 40px;">a. Gamma (closed window) dose rates >1000 mR/hr are expected to continue for ≥ 60 minutes.</p> <p style="text-align: center;">OR</p> <p style="padding-left: 40px;">b. Analyses of field survey samples indicate > 5000 mRem CDE Thyroid for 60 minutes of inhalation.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 " Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefor readily available on the 11x17 procedure matrix used by the SM.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AS1</p> <p>Initiating Condition – SITE AREA EMERGENCY</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 100 mrem TEDE or 500 mrem thyroid CDE.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. Reading on any of the following radiation monitors greater than the reading shown for 15 minutes or longer:</p> <p>(site specific monitor list and threshold values)</p> <p>2. Dose assessment actual meteorology indicates doses greater than 1000 mrem TEDE or 5000 mrem thyroid CDE at or beyond (site specific dose receptor point)</p> <p>3. Field survey results indicate EITHER of the following at or beyond (site specific dose receptor point):</p> <ul style="list-style-type: none"> Closed window dose rates greater than 100 mR/hr expected to continue for 60 minutes or longer. Analysis of field survey samples indicate thyroid CDE greater than 500 mrem for one hour of inhalation. 	<p style="text-align: right;">RS1</p> <p>Initiating Condition:</p> <p>Release of gaseous radioactivity resulting in offsite dose greater than 100 mRem TEDE or 500 mRem thyroid CDE.</p> <p>Operating Mode Applicability:</p> <p>1,2,3,4,5,6,D</p> <p>Emergency Action Levels (EAL) :</p> <p>Notes:</p> <ul style="list-style-type: none"> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <p>1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > 3.87 E+8 µCi/sec for ≥ 15 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).</p> <p>OR</p> <p>2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of EITHER:</p> <p>a. > 100 mRem TEDE</p> <p>OR</p> <p>b. > 500 mRem CDE Thyroid</p> <p>OR</p> <p>3. Field survey results at or beyond the site boundary indicate EITHER:</p> <p>a. Gamma (closed window) dose rates >100 mR/hr are expected to continue for ≥ 60 minutes.</p> <p>OR</p> <p>b. Analyses of field survey samples indicate > 500 mRem CDE Thyroid for 60 minutes of inhalation.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 " Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefore readily available on the 11x17 procedure matrix used by the SM.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AA1</p> <p>Initiating Condition – ALERT</p> <p>Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Note:</p> <ul style="list-style-type: none"> The Emergency Director should declare the Alert promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <ol style="list-style-type: none"> Reading on any of the following radiation monitors greater than the reading shown for 15 minutes or longer: (site-specific monitor list and threshold values) Dose assessment actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site specific dose receptor point) Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond (site-specific dose receptor point) for one hour of exposure. Field survey results indicate EITHER of the following at or beyond (site specific dose receptor point): <ul style="list-style-type: none"> Closed window dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer. Analysis of field survey samples indicate thyroid CDE greater than 50 mrem for one hour of inhalation. 	<p style="text-align: right;">RA1</p> <p>Initiating Condition:</p> <p>Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL) :</p> <p>Note:</p> <ul style="list-style-type: none"> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available. <ol style="list-style-type: none"> The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) > 3.87 E+07 µCi/sec for ≥ 15 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Nobel Gas Release Rate). OR Dose assessment using actual meteorology indicates doses at or beyond the site boundary of EITHER: <ol style="list-style-type: none"> > 10 mRem TEDE OR <ol style="list-style-type: none"> > 50 mRem CDE Thyroid OR Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than EITHER of the following at or beyond the site boundary <ol style="list-style-type: none"> 10 mRem TEDE for 60 minutes of exposure OR <ol style="list-style-type: none"> 50 mRem CDE Thyroid for 60 minutes of exposure OR Field survey results at or beyond the site boundary indicate EITHER: <ol style="list-style-type: none"> Gamma (closed window) dose rates > 10 mR/hr are expected to continue for ≥ 60 minutes. OR <ol style="list-style-type: none"> Analyses of field survey samples indicate > 50 mRem CDE Thyroid for 60 minutes of inhalation. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 " Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefor readily available on the 11x17 procedure matrix used by the SM.</p> <p>3) Calculations were performed, in accordance with (IAW) guidance provided in NEI 99-01 revision 6 EAL AA1, to determine the effluent monitor response for a radioactive liquid release and a WGD release via the normal site release pathway. The release would contain activity equivalent to provide 10mrem TEDE or 50mrem thyroid CDE at the site boundary. The calculation determined the effluent monitor responses would be >110% of the instruments maximum range and as such, IAW NEI 99-01 Rev 6 guidance, was not included in this EAL.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AU1</p> <p>Initiating Condition – UNUSUAL EVENT</p> <p>Release of gaseous or liquid radioactivity greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Note:</p> <ul style="list-style-type: none"> The Emergency Director should declare the Alert promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes. If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes. <ol style="list-style-type: none"> Reading on ANY effluent radiation monitor greater than 2 times the (site-specific effluent release controlling document) limits for 60 minutes or longer: (site-specific monitor list and threshold values corresponding to 2 times the controlling document limits) Reading on ANY effluent radiation monitor greater than 2 times the alarm setpoint established by a current radioactivity discharge permit for 60 minutes or longer. Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times (site-specific effluent release controlling document limits) for 60 minutes or longer. 	<p style="text-align: right;">RU1</p> <p>Initiating Condition:</p> <p>Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL) :</p> <p>Note:</p> <ul style="list-style-type: none"> The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes. Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes. <ol style="list-style-type: none"> Reading on any of the following effluent monitors > 2 times alarm setpoint established by a current radioactive release discharge permit for ≥ 60 minutes. <ul style="list-style-type: none"> 0PR01J, Liquid Radwaste Effluent Monitor 0PR90J, Liquid Radwaste Effluent Monitor 0PR02J, Gas Decay Tank Effluent Monitor 0PR10J, Station Blowdown Monitor 1/2 PR01J, Containment Purge Effluent Monitor Discharge Permit specified monitor <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> The sum of readings on the Unit 1 and 2 Aux Bldg Vent WRGMs (1/2 RE-PR030) > 4.42 E+05 µCi/sec for ≥ 60 minutes (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate). <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > 2 times ODCM Limit with a release duration of ≥ 60 minutes. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific monitors and Threshold values to ensure timely classification.</p> <p>2) Added the following to bullet #3 " Classification based on effluent monitor readings assumes that a release path to the environment is established." In order to delete the following from the basis "Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes." This allows for more timely classification since all the basis information pertaining to Note bullet 3 will be contained in the IC and therefor readily available on the 11x17 procedure matrix used by the SM.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AG2</p> <p>Initiating Condition -- GENERAL EMERGENCY</p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer .</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels:</p> <p>NOTES: The Emergency Director should declare the General Emergency promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded</p> <p>1. Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.</p>	<p style="text-align: right;">RG2</p> <p>Initiating Condition:</p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.</p> <p>Operating Mode Applicability: 1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Level (EAL):</p> <p>Note: The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for 60 minutes or longer.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) EAL will be used in accordance with the discussion in Section 1.4, NRC Order EA-12-051, it is recommended that this EAL be implemented when the enhanced spent fuel pool level instrumentation is available for use. The completion of the enhanced SFP level indicators and need for the inclusion of this EAL is being tracked in accordance with Exelon Generation Company, LLC's Initial Status Report to March 12, 2012 Commission Order Modifying Licenses with Regard for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) dated October 25,2012.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AS2</p> <p>Initiating Condition – SITE AREA EMERGENCY</p> <p>Spent fuel pool level at (site-specific Level 3 description)</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels:</p> <p>1. Lowering of spent fuel pool level to (site-specific Level 3 value).</p>	<p style="text-align: right;">RS2</p> <p>Initiating Condition:</p> <p>Spent fuel pool level at (site-specific Level 3 description).</p> <p>Operating Mode Applicability: 1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Level (EAL):</p> <p>Lowering of spent fuel pool level to (site-specific Level 3 value).</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) EAL will be used in accordance with the discussion in Section 1.4, NRC Order EA-12-051, it is recommended that this EAL be implemented when the enhanced spent fuel pool level instrumentation is available for use. The completion of the enhanced SFP level indicators and need for the inclusion of this EAL is being tracked in accordance with Exelon Generation Company, LLC's Initial Status Report to March 12, 2012 Commission Order Modifying Licenses with Regard for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) dated October 25, 2012.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<div>AA2</div> <div>Initiating Condition – ALERT</div> <div>Significant lowering of water level above, or damage to, irradiated fuel.</div> <div>Operating Mode Applicability: All</div> <div>Example Emergency Action Levels: (1 or 2 or 3)</div> <div><div>1. Uncovery of irradiated fuel in the REFUELING PATHWAY.</div><div>2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by ANY of the following radiation monitors:<div>(site-specific listing of radiation monitors, and the associated readings, setpoints and/or alarms)</div></div><div>3. Lowering of spent fuel pool level to (site-specific Level 2 value).</div></div>	<div>RA2</div> <div>Initiating Condition:</div> <div>Significant lowering of water level above, or damage to, irradiated fuel.</div> <div>Operating Mode Applicability:</div> <div>1, 2, 3, 4, 5, 6,D</div> <div>Emergency Action Levels (EAL) :</div> <div><div>1. Uncovery of irradiated fuel in the REFUELING PATHWAY.</div><div>OR</div><div>2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by ANY Table R1 Radiation Monitor reading >1000 mRem/hr</div><div>OR</div><div>3. Lowering of spent fuel pool level to (site-specific Level 2 value).</div></div> <div><div>Table R1</div><div>Fuel Handling Incident Radiation Monitors</div><div><div>• Fuel Building Fuel Handling Incident Monitor 0RE-AR055</div><div>• Fuel Building Fuel Handling Incident Monitor 0RE-AR056</div><div>• Containment Fuel Handling Incident Monitor 1/2RE-AR011</div><div>• Containment Fuel Handling Incident Monitor 1/2RE-AR012</div></div></div>	<div><div><div></div>No Change</div><div><div>X</div>Difference</div><div><div></div>Deviation</div></div> <div>1) Listed site-specific monitors and Threshold values to ensure timely classification.</div> <div>2) EAL #3 will be used in accordance with the discussion in Section 1.4, NRC Order EA-12-051, it is recommended that this EAL be implemented when the enhanced spent fuel pool level instrumentation is available for use. The completion of the enhanced SFP level indicators and need for the inclusion of this EAL is being tracked in accordance with Exelon Generation Company, LLC's Initial Status Report to March 12, 2012 Commission Order Modifying Licenses with Regard for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) dated October 25,2012.</div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">AU2</p> <p>Initiating Condition: UNUSUAL EVENT UNPLANNED loss of water level above irradiated fuel</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels:</p> <p>1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following:</p> <p style="padding-left: 40px;">(site-specific level indications).</p> <p>AND</p> <p>b. UNPLANNED rise in area radiation levels as indicated by ANY of the following radiation monitors.</p> <p style="padding-left: 40px;">(site-specific list of area radiation monitors)</p>	<p style="text-align: right;">RU2</p> <p>Initiating Condition: UNPLANNED loss of water level above irradiated fuel</p> <p>Operating Mode Applicability: 1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL) :</p> <p>1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by ANY of the following :</p> <ul style="list-style-type: none"> • Refueling Cavity water level <23 ft above the Reactor Flange (< 423 ft. indicated level) <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Spent Fuel Pool water level < 23 ft. above the fuel (<422 ft 9 in indicated level) <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Indication or report of a drop in water level in the REFUELING PATHWAY. <p>AND</p> <p>b. UNPLANNED Area Radiation Monitor reading rise on ANY radiation monitor in Table R1.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Table R1 Fuel Handling Incident Radiation Monitors</p> <ul style="list-style-type: none"> • Fuel Building Fuel Handling Incident Monitor ORE-AR055 • Fuel Building Fuel Handling Incident Monitor ORE-AR056 • Containment Fuel Handling Incident Monitor 1/2RE-AR011 • Containment Fuel Handling Incident Monitor 1/2RE-AR012 </div>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 2px 5px;">X</div> <div>No Change</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div>Difference</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div>Deviation</div> </div> <p>1) Listed site-specific level indication and monitors to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification										
<p style="text-align: right;">AA3</p> <p>Initiating Condition – ALERT</p> <p>Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p>Operating Mode Applicability: All</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted</p> <ol style="list-style-type: none"> Dose rate greater than 15 mR/hr in ANY of the following areas: <ul style="list-style-type: none"> Control Room Central Alarm Station (other site-specific areas/rooms) An UNPLANNED event results in radiation levels that prevent or significantly impede access to any of the following plant rooms or areas: (site-specific list of plant rooms or areas with entry-related mode applicability identified) 	<p style="text-align: right;">RA3</p> <p>Initiating Condition:</p> <p>Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6,D</p> <p>Emergency Action Levels (EAL) :</p> <p>Note: If the equipment in the room or area listed in Table R3 was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted</p> <ol style="list-style-type: none"> Dose rate greater than 15 mR/hr in ANY of the following areas: <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">Table R2</p> <p style="text-align: center;">Areas Requiring Continuous Occupancy</p> <ul style="list-style-type: none"> Main Control Room – 1/2RE-AR010 Central Alarm Station – (by survey) </div> <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> An UNPLANNED event results in radiation levels that prohibit or significantly impede access to any of the following Table R3 plant rooms or area: <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: center;">Table R3 Areas with Entry Related Mode Applicability</th> </tr> <tr> <th style="text-align: center;">Area</th> <th style="text-align: center;">Entry Related Mode Applicability</th> </tr> </thead> <tbody> <tr> <td>Auxiliary Building 426' VCT Valve Aisle</td> <td rowspan="5" style="text-align: center; vertical-align: middle;">Mode 4, 5, and 6</td> </tr> <tr> <td>Auxiliary Building 401' Curved Wall Area Penetration Area</td> </tr> <tr> <td>Auxiliary Building 383' Remote Shutdown Panel Area</td> </tr> <tr> <td>Auxiliary Building 364' CV Pp areas Curved Wall Area</td> </tr> <tr> <td>Auxiliary Building 346' RH pump areas</td> </tr> </tbody> </table> </div>	Table R3 Areas with Entry Related Mode Applicability		Area	Entry Related Mode Applicability	Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6	Auxiliary Building 401' Curved Wall Area Penetration Area	Auxiliary Building 383' Remote Shutdown Panel Area	Auxiliary Building 364' CV Pp areas Curved Wall Area	Auxiliary Building 346' RH pump areas	<div style="display: flex; justify-content: space-around; align-items: center; margin-bottom: 10px;"> <div style="border: 1px solid black; padding: 2px 5px;"><input checked="" type="checkbox"/> No Change</div> <div style="border: 1px solid black; padding: 2px 5px;"><input type="checkbox"/> Decrease</div> <div style="border: 1px solid black; padding: 2px 5px;"><input type="checkbox"/> Delete</div> </div> <p>1) Listed site specific plant rooms and areas with identified mode applicability to ensure timely classification.</p>
Table R3 Areas with Entry Related Mode Applicability												
Area	Entry Related Mode Applicability											
Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6											
Auxiliary Building 401' Curved Wall Area Penetration Area												
Auxiliary Building 383' Remote Shutdown Panel Area												
Auxiliary Building 364' CV Pp areas Curved Wall Area												
Auxiliary Building 346' RH pump areas												

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SU3</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Reactor coolant activity greater than Technical Specification allowable limits.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <ol style="list-style-type: none"> (Site-specific radiation monitor) reading greater than (site-specific value). <p>OR</p> <ol style="list-style-type: none"> Sample analysis indicates that a reactor coolant activity value is greater than an allowable limit specified in Technical Specifications. 	<p style="text-align: right;">RU3</p> <p>Initiating Condition:</p> <p>Reactor coolant activity greater than Technical Specification allowable limits.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> Gross Failed Fuel Monitor 1/2RE-PR006 indicating I-135 concentration > 5 µCi/cc. <p>OR</p> <ol style="list-style-type: none"> Sample analysis indicates that: <ol style="list-style-type: none"> Dose Equivalent I-131 specific coolant activity > 60.0 µCi/gm. <p>OR</p> <ol style="list-style-type: none"> Dose Equivalent XE-133 specific coolant activity > 603.0 µCi/gm. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific monitor and threshold value to ensure timely classification.</p> <p>2) Listed this system category EAL in the radiological category EAL section to maintain consistency with current and previous revisions of Exelon EALs. This will ensure a timely classification since the threshold values are more aligned with the radiological category vice system category.</p>

Fission Product Barrier Matrix

Hot Matrix

GENERAL EMERGENCY			SITE AREA EMERGENCY		ALERT	
FG1 Loss of any two barriers AND Loss or Potential Loss of third barrier. 1,2,3,4			FS1 Loss or Potential Loss of ANY two barriers. 1,2,3,4		FA1 ANY Loss or ANY Potential Loss of either Fuel Clad or RCS 1,2,3,4	
Sub-Category	FC – Fuel Clad		RC – Reactor Coolant System		CT - Containment	
	Loss	Potential Loss	Loss	Potential Loss	Loss	Potential Loss
1. RCS or SG Tube Leakage	None	Core Cooling CSF-Orange Path conditions exist.	1. An automatic or manual SI actuation is required by EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube RUPTURE.	2. The capacity of one charging pump in the normal mode is exceeded due to EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube leakage. OR 3. RCS Integrity CFS-Red Path conditions exist	A leaking or RUPTURED SG is FAULTED outside of containment.	None
2. Inadequate Heat Removal	1. Core Cooling CSF-Red Path conditions exist.	2. Core Cooling CSF-Orange Path conditions exist. 3. Heat Sink CSF-Red Path conditions exist.	None	Heat Sink CSF-Red Path conditions exist.	None	Core Cooling CSF-Red Path conditions exist. AND Functional Restoration Procedures <u>not</u> effective in < 15 minutes.
3. RCS Activity/ Containment Radiation	1. Containment radiation monitor (AR020(21)) reading > 1.95E+03 R/hr. OR 2. Coolant activity as sampled > 300µCi/gm Dose Equivalent I-131.	None	Containment radiation monitor (AR020(21)) reading > 25 R/hr.	None	None	Containment radiation monitor (AR020(21)) reading > 4.40E+03 R/hr.
4. Containment Integrity or Bypass	None	None	None	None	1. Containment isolation is required and EITHER of the following: a. UNPLANNED lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Directors judgment indicate a loss of containment integrity. OR b. UNISOLABLE pathway from containment to the environment exists. OR 2. Indication of RCS leakage outside of containment	3. Containment CSF- Red Path conditions exist. OR 4. Hydrogen concentration inside containment ≥5%. OR 5. a. Containment pressure ≥20 psig. AND b. Less than one full train of containment Spray is operating per design for ≥15 minutes.
5. Emergency Director Judgment	A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.	A. ANY Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.	A. Any Condition in the opinion of the Emergency Director that Indicates Potential Loss of the RCS Barrier.	A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.	A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.

Proposed Fission Product Barrier Matrix
Fission Product Barrier Matrix

Hot Matrix

GENERAL EMERGENCY			SITE AREA EMERGENCY		ALERT	
FG1 Loss of any two barriers AND Loss or Potential Loss of third barrier. 1234			FS1 Loss or Potential Loss of ANY two barriers. 1234		FA1 ANY Loss or ANY Potential Loss of either Fuel Clad or RCS 1234	
Sub-Category	FC – Fuel Clad		RC – Reactor Coolant System		CT - Containment	
	Loss	Potential Loss	Loss	Potential Loss	Loss	Potential Loss
1. RCS or SG Tube Leakage	None	Core-Cooling CSF – Orange Path conditions exist.	1. An automatic or manual SI actuation is required by EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube RUPTURE.	2. The capacity of one charging pump in the normal mode is exceeded due to EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube leakage. OR 3. RCS Integrity CFS - Red path conditions exist.	A leaking or RUPTURED SG is FAULTED outside of containment.	None
2. Inadequate Heat Removal	1. Core-Cooling CSF – Red Path conditions exist.	2. Core-Cooling CSF – Orange Path conditions exist. OR 3. Heat Sink CSF - Red Path conditions exist.	None	Heat Sink CSF - Red Path conditions exist.	None	Core Cooling CSF-Red Path conditions exist AND Functional Restoration Procedures <u>not</u> effective in <15 minutes.
3. Containment Radiation / RCS Activity	1. Containment radiation monitor (AR020(21)) reading > 1.95E+03 R/hr. OR 2. Coolant activity as sampled >300µCi/gm Dose Equivalent I-131.	None	Containment radiation monitor (AR020(21)) reading > 25 R/hr.	None	None	Containment radiation monitor(AR020(21)) reading > 4.40E+03 R/hr.
4. Containment Integrity or Bypass	None	None	None	None	1. Containment isolation is required and EITHER of the following: a. UNPLANNED lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Directors judgment indicate a loss of containment integrity. OR b. UNISOLABLE pathway from containment to the environment exists. OR 2. Indication of RCS leakage outside of containment	3. Containment CSF - Red path conditions exist. OR 4. Hydrogen concentration in Containment ≥ 5%. OR 5. a. Containment pressure ≥ 20 psig. AND b. Less than one full train of Containment Spray is operating per design for ≥15 minutes.
5. Emergency Director Judgment	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.	1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.	2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC1</p> <p>Category: Fuel Clad Barrier RCS or SG tube leakage Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Potential Loss A. RCS/reactor vessel level less than (site-specific level).</p>	<p style="text-align: right;">FC1</p> <p>Category: Fuel Clad Barrier RCS or SG tube leakage Operating Mode Applicability: 1, 2, 3, 4 Fission Product Barrier (FPB) Threshold: <u>Potential Loss</u> 1. Core-Cooling CSF – Orange Path conditions exist.</p>	<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="display: flex; align-items: center;"> <input checked="" type="checkbox"/> No Change </div> <div style="display: flex; align-items: center;"> <input type="checkbox"/> Difference </div> <div style="display: flex; align-items: center;"> <input type="checkbox"/> Deviation </div> </div> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC2</p> <p>Category: Fuel Clad Barrier Inadequate Heat Removal Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Core exit thermocouple readings greater than (site-specific temperature value). Potential Loss A. Core exit thermocouple readings greater than (site-specific temperature value). OR B. Inadequate RCS heat removal capability via steam generators as indicated by (site-specific indications).</p>	<p style="text-align: right;">FC2</p> <p>Category: Fuel Clad Barrier RCS Activity Operating Mode Applicability: 1, 2, 3, 4 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Core-Cooling CSF – Red Path conditions exist. <u>Potential Loss</u> 2. Core-Cooling CSF – Orange Path conditions exist. OR 3. Heat Sink CSF - Red Path conditions exist.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> No Change </div> <div style="text-align: center;"> <input type="checkbox"/> Difference </div> <div style="text-align: center;"> <input type="checkbox"/> Deviation </div> </div> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC3</p> <p>Category: Fuel Clad Barrier Containment Radiation / RCS Activity Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Containment radiation monitor reading greater than (site-specific value). OR B. (Site-specific indications that reactor coolant activity is greater than 300 µCi/gm dose equivalent I-131).</p>	<p style="text-align: right;">FC3</p> <p>Category: Fuel Clad Barrier Containment Radiation / RCS Activity Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Containment radiation monitor (AR020(21)) reading > 1.95E+03 R/hr. OR 2. Coolant activity as sampled > 300µCi/gm Dose Equivalent I-131.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> No Change </div> <div style="text-align: center;"> <input type="checkbox"/> Difference </div> <div style="text-align: center;"> <input type="checkbox"/> Deviation </div> </div> <p>1) Listed site-specific monitor and threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">FC6</p> <p>Category: Fuel Clad Barrier Emergency Director Judgment Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: <u>Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier. <u>Potential Loss</u> A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.</p>	<p style="text-align: right;">FC5</p> <p>Category: Fuel Clad Barrier Emergency Director Judgment Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier. <u>Potential Loss</u> 2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.</p>	<div> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">RC1</p> <p>Category: Reactor Coolant System Barrier RCS or SG Tube Leakage Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: <u>Loss</u> A. An automatic or manual ECCS (SI) actuation is required by EITHER of the following: 1. UNISOLABLE RCS leakage OR 2. SG tube RUPTURE. <u>Potential Loss</u> A. Operation of a standby charging (makeup) pump is required by EITHER of the following: 1. UNISOLABLE RCS leakage OR 2. SG tube leakage. OR B. RCS cooldown rate greater than (site-specific pressurized thermal shock criteria/limits defined by site-specific indications).</p>	<p style="text-align: right;">RC1</p> <p>Category: Reactor Coolant System Barrier RCS or SG Tube Leakage Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. An automatic or manual SI actuation is required by EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube RUPTURE. <u>Potential Loss</u> 2. The capacity of one charging pump in the normal charging mode is exceeded due to EITHER of the following: a. UNISOLABLE RCS leakage OR b. SG tube leakage. OR 3. RCS Integrity CSF - Red path conditions exist.</p>	<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="display: flex; align-items: center;"> <input checked="" type="checkbox"/> X <div style="margin-left: 10px;">No Change</div> </div> <div style="display: flex; align-items: center;"> <input type="checkbox"/> Difference </div> <div style="display: flex; align-items: center;"> <input type="checkbox"/> Deviation </div> </div> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<div>RC2</div> <p>Category: Reactor Coolant System Barrier Inadequate Heat Removal Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Potential Loss A. Inadequate RCS heat removal capability via steam generators as indicated by (site-specific indications).</p>	<div>RC2</div> <p>Category: Reactor Coolant System Barrier Inadequate Heat Removal Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Potential Loss</u> Heat Sink CSF - Red Path conditions exist.</p>	<div><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</div> <p>1) Listed site-specific threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<div>RC3</div> <div>Category: Reactor Coolant System Barrier Containment Radiation / RCS Activity Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Containment radiation monitor reading greater than (site-specific value).</div>	<div>RC3</div> <div>Category: Reactor Coolant System Barrier RCS Leak Rate Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> Containment radiation monitor (AR020(21)) reading > 25 R/hr.</div>	<div><div><input checked="" type="checkbox"/> X</div> No Change<div><input type="checkbox"/></div> Difference<div><input type="checkbox"/></div> Deviation</div> <div>1) Listed site-specific systems and threshold values to ensure timely classification.</div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">RC6</p> <p>Category: Reactor Coolant System Barrier Emergency Director Judgment Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Any Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier. Potential Loss A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.</p>	<p style="text-align: right;">RC5</p> <p>Category: Reactor Coolant System Barrier Emergency director Judgment Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. ANY Condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier. <u>Potential Loss</u> 2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.</p>	<div> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT1</p> <p>Category: Containment Barrier RCS or SG Tube Leakage Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. A leaking or RUPTURED SG is FAULTED outside of containment.</p>	<p style="text-align: right;">CT1</p> <p>Category: Containment Barrier RCS or SG Tube Leakage Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> A leaking or RUPTURED SG is FAULTED outside of containment.</p>	<div> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific threshold values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT2</p> <p>Category: Containment Barrier Inadequate Heat Removal Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Potential Loss A. 1. (Site-specific criteria for entry into core cooling restoration procedure) AND 2. Restoration procedure not effective within 15 minutes.</p>	<p style="text-align: right;">CT2</p> <p>Category: Containment Barrier Inadequate Heat Removal Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Potential Loss</u> Core-Cooling CSF Red Path conditions exist AND Functional Restoration procedures not effective in < 15 minutes</p>	<div> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific threshold values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<div>CT3</div> <p>Category: Containment Barrier</p> <p>Containment Radiation / RCS Activity</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Fission Product Barrier Threshold:</p> <p>Potential Loss</p> <p>A. Containment radiation monitor reading greater than (site-specific value).</p>	<div>CT3</div> <p>Category: Containment Barrier</p> <p>Containment Radiation / RCS Activity</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3</p> <p>Fission Product Barrier (FPB) Threshold:</p> <p><u>Potential Loss</u></p> <p>Containment radiation monitor (AR020(21)) reading > 4.40E+03 R/hr.</p>	<div> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site-specific threshold values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CT4</p> <p>Category: Containment Barrier Containment Integrity or Bypass Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Containment isolation is required AND EITHER of the following: 1. Containment integrity has been lost based on Emergency Director judgment. OR 2. UNISOLABLE pathway from the containment to the environment exists. OR B. Indications of RCS leakage outside of containment.</p> <p>Potential Loss A. Containment pressure greater than (site-specific value) OR B. Explosive mixture exists inside containment OR C. 1. Containment pressure greater than (site-specific pressure setpoint) AND 2. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer.</p>	<p style="text-align: right;">CT4</p> <p>Category: Containment Barrier Containment Integrity or Bypass Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Containment isolation is required and EITHER of the following: a. UNPLANNED lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Director judgment indicate a loss of containment integrity. OR b. UNISOLABLE pathway from containment to the environment exists. OR 2. Indication of RCS leakage outside of containment <u>Potential Loss</u> 3. Containment CSF - Red path conditions exist. OR 4. Hydrogen concentration in Containment \geq 5%. OR 5. a. Containment pressure \geq 20 psig. AND b. Less than one full train of Containment Spray is operating per design for \geq 15 minutes.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 2px 5px;">X</div> <div>No Change</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div>Difference</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div>Deviation</div> </div> <p>1) Listed site-specific monitor and threshold value to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<div>CT6</div> <p>Category: Containment Barrier Emergency director Judgment Operating Mode Applicability: Power Operation, Startup, Hot Standby, Hot Shutdown Fission Product Barrier Threshold: Loss A. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier. Potential Loss A. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.</p>	<div>CT5</div> <p>Category: Containment Barrier Emergency Director Judgment Operating Mode Applicability: 1, 2, 3 Fission Product Barrier (FPB) Threshold: <u>Loss</u> 1. Any Condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier. <u>Potential Loss</u> 2. Any Condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.</p>	<div> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SG1</p> <p>Initiating Condition: GENERAL EMERGENCY</p> <p>Prolonged loss of all offsite and all onsite AC power to emergency buses.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the General Emergency promptly upon determining that (site-specific hours) has been exceeded, or will likely be exceeded.</p> <p>1. a. Loss of ALL offsite and ALL onsite AC power to (site-specific emergency buses).</p> <p style="padding-left: 40px;">AND</p> <p style="padding-left: 40px;">b. EITHER of the following:</p> <ul style="list-style-type: none"> • Restoration of at least one emergency bus in less than (site-specific hours) is not likely. • (Site-specific indication of an inability to adequately remove heat from the core) 	<p style="text-align: right;">MG1</p> <p>Initiating Condition:</p> <p>Prolonged loss of all offsite and all onsite AC power to emergency buses.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. Loss of ALL offsite AC power to unit ESF buses.</p> <p style="padding-left: 40px;">AND</p> <p>2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.</p> <p style="padding-left: 40px;">AND</p> <p>3. EITHER of the following:</p> <ul style="list-style-type: none"> • Restoration of at least one unit ESF bus in < 4 hours is <u>not</u> likely. <p style="padding-left: 40px;">OR</p> <ul style="list-style-type: none"> • Core Cooling CFS – Red Path conditions exist 	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 2px 5px;">X</div> <div>No Change</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div>Difference</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div>Deviation</div> </div> <p>1) Listed site specific equipment, site specific time based on station blackout coping analysis, and site specific indication to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: SITE AREA EMERGENCY SS1</p> <p>Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite and ALL onsite AC Power to (site-specific emergency buses) for 15 minutes or longer.</p>	<p>Initiating Condition: MS1</p> <p>Loss of all offsite and onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. Loss of ALL offsite AC power to unit ESF buses. <p>AND</p> <ol style="list-style-type: none"> 2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses. <p>AND</p> <ol style="list-style-type: none"> 3. Failure to restore power to at lease one unit ESF bus in < 15 minutes from the time of loss of both offsite and onsite AC power. 	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SA1</p> <p>Initiating Condition: ALERT</p> <p>Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>1. a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer.</p> <p>AND</p> <p>b. Any additional single power source failure will result in loss of all AC power to SAFETY SYSTEMS.</p>	<p style="text-align: right;">MA1</p> <p>Initiating Condition:</p> <p>Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>1. AC power capability to unit ESF buses reduced to only one of the following power sources for ≥ 15 minutes.</p> <ul style="list-style-type: none"> • Affected unit SAT 142-1(242-1) • Affected unit SAT 142-2(242-2) • Emergency Diesel Generator DG 1A(2A) • Emergency Diesel Generator DG 1B(2B) • Unit crosstie breakers <p>AND</p> <p>2. Any additional single power source failure will result in a loss of ALL AC power to SAFETY SYSTEMS.</p>	<p> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SU1</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite AC power capability to (site-specific emergency buses) for 15 minutes or longer</p>	<p style="text-align: right;">MU1</p> <p>Initiating Condition:</p> <p>Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite AC power capability to unit ESF buses for ≥ 15 minutes</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p data-bbox="73 199 661 219">Initiating Condition: GENERAL EMERGENCY SG8</p> <p data-bbox="73 261 598 280">Loss of all AC and Vital DC power sources for 15 minutes or longer.</p> <p data-bbox="73 310 325 330">Operating Mode Applicability:</p> <p data-bbox="73 360 499 379">Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p data-bbox="73 409 373 429">Example Emergency Action Levels:</p> <p data-bbox="73 459 709 525">Note: The Emergency Director should declare the General Emergency promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <p data-bbox="73 550 709 591">1. Loss of ALL offsite and ALL onsite AC power to (site-specific emergency buses) for 15 minutes or longer.</p> <p data-bbox="136 607 178 627">AND</p> <p data-bbox="136 657 672 698">Indicated voltage is less than (site-specific bus voltage value) on ALL (site-specific vital DC buses) for 15 minutes or longer.</p>	<p data-bbox="716 199 1312 219">Initiating Condition: MG2</p> <p data-bbox="716 261 1249 280">Loss of all AC and Vital DC power sources for 15 minutes or longer.</p> <p data-bbox="716 310 976 330">Operating Mode Applicability:</p> <p data-bbox="716 360 808 379">1, 2, 3, 4</p> <p data-bbox="716 409 997 429">Emergency Action Levels (EAL):</p> <p data-bbox="716 459 1339 525">Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p data-bbox="716 550 1165 569">1. Loss of ALL offsite AC power to unit ESF buses.</p> <p data-bbox="787 591 829 611">AND</p> <p data-bbox="716 640 1318 682">2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.</p> <p data-bbox="787 707 829 726">AND</p> <p data-bbox="716 756 1302 797">3. Voltage is < 108 VDC on unit 125 VDC battery buses 111(211) and 112(212).</p> <p data-bbox="787 822 829 842">AND</p> <p data-bbox="716 872 1312 892">4. All AC and Vital DC power sources have been lost for ≥ 15 minutes.</p>	<p data-bbox="1367 199 1942 252"> <input data-bbox="1381 211 1423 244" type="checkbox"/> No Change <input checked="" data-bbox="1606 211 1648 244" type="checkbox"/> Difference <input data-bbox="1801 211 1843 244" type="checkbox"/> Deviation </p> <p data-bbox="1367 294 1953 313">1) Listed site specific voltage and equipment to ensure timely classification.</p> <p data-bbox="1367 335 1984 376">2) Removed the word "indicated" this will allow for an indication problem to not cause confusion on the need to declare.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: SITE AREA EMERGENCY SS8</p> <p>Loss of all Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Site Area Emergency promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Indicated voltage is less than (site-specific bus voltage value) on ALL Vital DC buses for 15 minutes or longer.</p>	<p>Initiating Condition: MS2</p> <p>Loss of all Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Voltage is < 108 VDC on unit 125 VDC battery buses 111(211) and 112(212) for ≥ 15 minutes.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific equipment and site specific value to ensure timely classification.</p> <p>2) Removed the word "indicated" this will allow for an indication problem to not cause confusion on the need to declare.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SS5</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>Inability to shutdown the reactor causing a challenge to (core cooling [PWR] / RPV water level [BWR]) or RCS heat removal.</p> <p>Operating Mode Applicability:</p> <p>Power Operation</p> <p>Example Emergency Action Levels:</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> b. All manual actions to shutdown the reactor have been unsuccessful. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> c. EITHER of the following conditions exist: <ol style="list-style-type: none"> 1. (Site-specific indication of an inability to adequately remove heat from the core) <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. (Site-specific indication of an inability to adequately remove heat from the RCS) 	<p style="text-align: right;">MS3</p> <p>Initiating Condition:</p> <p>Inability to shutdown the reactor causing a challenge to core cooling or RCS heat removal.</p> <p>Operating Mode Applicability:</p> <p>1,2</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. Automatic or Manual Trip did <u>not</u> shutdown the reactor as indicated by Reactor Power \geq 5%. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 2. ALL manual actions to shutdown the reactor have been unsuccessful as indicated by Reactor Power \geq 5%. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 3. EITHER of the following conditions exist: <ol style="list-style-type: none"> a. Core Cooling CSF-RED Path conditions exist. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> b. Heat Sink CSF-RED Path conditions exist. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Mode 2 included in operating mode applicability as per developer notes.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">SA5</p> <p>Initiating Condition: ALERT</p> <p>Automatic or manual (trip [PWR] / scram [BWR]) fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.</p> <p>Operating Mode Applicability:</p> <p>Power Operation</p> <p>Example Emergency Action Levels:</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> <ol style="list-style-type: none"> b. Manual action taken at the reactor control consoles are not successful in shutting down the reactor. 	<p style="text-align: right;">MA3</p> <p>Initiating Condition:</p> <p>Automatic or manual trip fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.</p> <p>Operating Mode Applicability:</p> <p>1,2</p> <p>Emergency Action Levels (EAL):</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <ol style="list-style-type: none"> 1. Automatic or manual Trip did not shutdown the reactor as indicated by Reactor Power \geq 5%. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 2. Manual actions taken at the Main Control Board are not successful in shutting down the reactor as indicated by Reactor Power \geq 5%. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Mode 2 included in operating mode applicability as per developer notes.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT SU5</p> <p>Automatic or manual (trip [PWR] / scram [BWR]) fails to shutdown the reactor.</p> <p>Operating Mode Applicability:</p> <p>Power Operation</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. An automatic (trip [PWR] / scram [BWR]) did not shutdown the reactor. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> b. A subsequent manual action taken at the reactor control consoles is successful in shutting down the reactor. 2. <ol style="list-style-type: none"> a. A manual trip ([PWR] / scram [BWR]) did not shutdown the reactor. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> b. EITHER of the following: <ol style="list-style-type: none"> 1. A subsequent manual action taken at the reactor control consoles is successful in shutting down the reactor. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. A subsequent automatic (trip [PWR] / scram [BWR]) is successful in shutting down the reactor. 	<p>Initiating Condition: MU3</p> <p>Automatic or manual trip fails to shutdown the reactor.</p> <p>Operating Mode Applicability:</p> <p>1,2</p> <p>Emergency Action Levels (EAL):</p> <p>Note: A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. Automatic Trip did not shutdown the reactor as indicated by Reactor Power $\geq 5\%$. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> b. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor. <p style="text-align: center;">OR</p> 2. <ol style="list-style-type: none"> a. Manual Trip did not shutdown the reactor as indicated by Reactor Power $\geq 5\%$. <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> b. EITHER of the following: <ol style="list-style-type: none"> 1. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. Subsequent Automatic Trip is successful in shutting down the reactor. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Mode 2 included in operating mode applicability as per developer notes.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification														
<div><div>Initiating Condition: ALERT<div>SA2</div></div><div>UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.</div><div>Operating Mode Applicability:<div>Power Operation, Startup, Hot Standby, Hot Shutdown</div></div><div>Example Emergency Action Levels:<div>Note: The Emergency Director should declare the Alert promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</div><div>1. a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer.<div>[see table below]</div></div><table><tr><td>[BWR parameter list]</td><td>[PWR parameter list]</td></tr><tr><td>Reactor Power</td><td>Reactor Power</td></tr><tr><td>RPV Level</td><td>RCS Level</td></tr><tr><td>RPV Pressure</td><td>RCS Pressure</td></tr><tr><td>Primary Containment Pressure</td><td>In Core/Core Exit Temperature</td></tr><tr><td>Suppression Pool Level</td><td>Levels in at least (site specific number) steam generators</td></tr><tr><td>Suppression Pool Temperature</td><td>Steam Generator Auxiliary or Emergency Feed Water Flow</td></tr></table><div>AND</div><div>b. Any of the following transient events in progress.<div><div>Automatic or Manual runback greater than 25% thermal reactor power</div><div>Electrical load rejection greater than 25% full electrical load</div><div>Reactor Scram [BWR] / trip [PWR]</div><div>ECCS (SI) actuation</div><div>Thermal power oscillations greater than 10% [BWR]</div></div></div></div></div> <div><div>Initiating Condition:<div>MA4</div></div><div>UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.</div><div>Operating Mode Applicability:<div>1, 2, 3, 4</div></div><div>Emergency Action Levels (EAL):<div>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</div><div>1. a. An UNPLANNED event results in the inability to monitor ANY Table M1 parameters from within the Control Room for ≥ 15 minutes.</div><table><tr><td><div>Table M1 – Control Room Parameters</div><div><div>Reactor Power</div><div>PZR Level</div><div>RCS Pressure</div><div>In Core/Core Exit Temperature</div><div>Narrow Range level in at least one Steam Generator</div><div>Steam generator Auxiliary Feed Water Flow</div></div></td></tr></table><div>AND</div><div>b. Any Table M2 transient in progress.</div><table><tr><td><div>Table M2 – Significant Transients</div><div><div>Automatic Turbine Runback >25% thermal reactor power</div><div>Electrical Load Rejection >25% full electrical load</div><div>Reactor Trip</div><div>Safety Injection Actuation</div></div></td></tr></table></div></div> <div><div><div><div>X</div>No Change</div><div><div></div>Difference</div><div><div></div>Deviation</div></div><div>1) Listed site specific number of steam generators to ensure timely classification.</div></div>	[BWR parameter list]	[PWR parameter list]	Reactor Power	Reactor Power	RPV Level	RCS Level	RPV Pressure	RCS Pressure	Primary Containment Pressure	In Core/Core Exit Temperature	Suppression Pool Level	Levels in at least (site specific number) steam generators	Suppression Pool Temperature	Steam Generator Auxiliary or Emergency Feed Water Flow	<div>Table M1 – Control Room Parameters</div> <div><div>Reactor Power</div><div>PZR Level</div><div>RCS Pressure</div><div>In Core/Core Exit Temperature</div><div>Narrow Range level in at least one Steam Generator</div><div>Steam generator Auxiliary Feed Water Flow</div></div>	<div>Table M2 – Significant Transients</div> <div><div>Automatic Turbine Runback >25% thermal reactor power</div><div>Electrical Load Rejection >25% full electrical load</div><div>Reactor Trip</div><div>Safety Injection Actuation</div></div>
[BWR parameter list]	[PWR parameter list]															
Reactor Power	Reactor Power															
RPV Level	RCS Level															
RPV Pressure	RCS Pressure															
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<div>Table M2 – Significant Transients</div> <div><div>Automatic Turbine Runback >25% thermal reactor power</div><div>Electrical Load Rejection >25% full electrical load</div><div>Reactor Trip</div><div>Safety Injection Actuation</div></div>																

NEI 99-01 Rev 6	Proposed EAL	Justification															
<p align="right">SU2</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <p>An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer. [see table below]</p> <table border="1"> <tr> <td>[BWR parameter list]</td> <td>[PWR parameter list]</td> </tr> <tr> <td>Reactor Power</td> <td>Reactor Power</td> </tr> <tr> <td>RPV Level</td> <td>RCS Level</td> </tr> <tr> <td>RPV Pressure</td> <td>RCS Pressure</td> </tr> <tr> <td>Primary Containment Pressure</td> <td>In Core/Core Exit Temperature</td> </tr> <tr> <td>Suppression Pool Level</td> <td>Levels in at least (site specific number) steam generators</td> </tr> <tr> <td>Suppression Pool Temperature</td> <td>Steam Generator Auxiliary or Emergency Feed Water Flow</td> </tr> </table>	[BWR parameter list]	[PWR parameter list]	Reactor Power	Reactor Power	RPV Level	RCS Level	RPV Pressure	RCS Pressure	Primary Containment Pressure	In Core/Core Exit Temperature	Suppression Pool Level	Levels in at least (site specific number) steam generators	Suppression Pool Temperature	Steam Generator Auxiliary or Emergency Feed Water Flow	<p align="right">MU4</p> <p>Initiating Condition:</p> <p>UNPLANNED loss of Control Room indications for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL): Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>An UNPLANNED event results in the inability to monitor ANY Table M1 parameters from within the Control Room for ≥ 15 minutes.</p> <table border="1"> <tr> <td> Table M1 – Control Room Parameters <ul style="list-style-type: none"> Reactor Power PZR Level RCS Pressure In Core/Core Exit Temperature Narrow Range level in at least one Steam Generator Steam generator Auxiliary Feed Water Flow </td> </tr> </table>	Table M1 – Control Room Parameters <ul style="list-style-type: none"> Reactor Power PZR Level RCS Pressure In Core/Core Exit Temperature Narrow Range level in at least one Steam Generator Steam generator Auxiliary Feed Water Flow 	<div> <input checked="checked" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific number of steam generators to ensure timely classification.</p>
[BWR parameter list]	[PWR parameter list]																
Reactor Power	Reactor Power																
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NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: ALERT SA9</p> <p>Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels:</p> <p>1. a. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> • Seismic event (earthquake) • Internal or external flooding event • High winds or tornado strike • FIRE • EXPLOSION • (site-specific hazards) • Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>b. EITHER of the following:</p> <p>1. Event damage has caused Indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode.</p> <p>OR</p> <p>2. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode.</p>	<p>Initiating Condition: ALERT MA5</p> <p>Hazardous event affecting a SAFETY SYSTEM required for the current operating mode.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Emergency Action Levels (EAL):</p> <p>Note: If it is determined that the conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.</p> <p>1. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> • Seismic event (earthquake) • Internal or external flooding event • High winds or tornado strike • FIRE • EXPLOSION • Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>2. EITHER of the following:</p> <p>a. Event damage has caused Indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.</p> <p>OR</p> <p>b. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) No additional site specific hazard noted</p> <p>2) Changed the word "needed" to "required" in the IC and to "required by Technical Specification" in the EAL, to be consistent with terminology used by operators and minimize confusion.</p> <p>3) Added additional note to easily direct the operator to potential lesser ICs</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT SU4</p> <p>RCS leakage for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. RCS unidentified or pressure boundary leakage greater than (site-specific value) for 15 minutes or longer. 2. RCS identified leakage greater than (site-specific value) for 15 minutes or longer 3. Leakage from the RCS to a location outside containment greater than 25 gpm for 15 minutes or longer 	<p>Initiating Condition: MU6</p> <p>RCS leakage for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. RCS unidentified or pressure boundary leakage > 10 gpm for ≥ 15 minutes <p>OR</p> <ol style="list-style-type: none"> 2. RCS identified leakage >25 gpm for ≥ 15 minutes <p>OR</p> <ol style="list-style-type: none"> 3. Leakage from the RCS to a location outside containment >25 gpm for ≥ 15 minutes 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific values to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification																																				
<p>Initiating Condition: UNUSUAL EVENT SU6</p> <p>Loss of all onsite or offsite communications capabilities</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <ol style="list-style-type: none"> Loss of ALL of the following onsite communication methods: (site-specific list of communications method) Loss of ALL of the following ORO communications s) methods: (site-specific list of communications methods) Loss of ALL of the following NRC communications methods: (site-specific list of communications methods) 	<p>Initiating Condition: MU7</p> <p>Loss of all onsite or offsite communication capabilities.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> Loss of ALL Table M3 Onsite communications capability affecting the ability to perform routine operations. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> Loss of ALL Table M3 Offsite communication capability affecting the ability to perform offsite notifications. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> Loss of ALL Table M3 NRC communication capability affecting the ability to perform NRC notifications. <table border="1" data-bbox="787 842 1318 1106"> <caption>Table M3 – Communications Capability</caption> <thead> <tr> <th>System</th> <th>Onsite</th> <th>Offsite</th> <th>NRC</th> </tr> </thead> <tbody> <tr> <td>Radios</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant page</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant Telephone System</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Commercial Telephones</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>NARS</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>ENS</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>HPN</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>Satellite phones</td> <td></td> <td>X</td> <td>X</td> </tr> </tbody> </table>	System	Onsite	Offsite	NRC	Radios	X			Plant page	X			Plant Telephone System	X			Commercial Telephones	X	X	X	NARS		X		ENS		X	X	HPN		X	X	Satellite phones		X	X	<div style="display: flex; justify-content: space-around; align-items: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific communication methods to ensure timely classification.</p>
System	Onsite	Offsite	NRC																																			
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Plant page	X																																					
Plant Telephone System	X																																					
Commercial Telephones	X	X	X																																			
NARS		X																																				
ENS		X	X																																			
HPN		X	X																																			
Satellite phones		X	X																																			

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT SU7</p> <p>Failure to isolate containment or loss of containment pressure control. [PWR]</p> <p>Operating Mode Applicability:</p> <p>Power Operation, Startup, Hot Standby, Hot Shutdown</p> <p>Example Emergency Action Levels: (1 or 2)</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. Failure of containment to isolate when required by an actuation signal. <li style="text-align: center;">AND b. ALL required penetrations are not closed within 15 minutes of the actuation signal. 2. <ol style="list-style-type: none"> a. Containment pressure greater than (site-specific pressure). <li style="text-align: center;">AND b. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer. 	<p>Initiating Condition: MU8</p> <p>Failure to isolate containment or loss of containment pressure control.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a. Failure of containment to isolate when required by an actuation signal. <li style="text-align: center;">AND b. ANY required penetration remains open > 15 minutes of the actuation signal. <li style="text-align: center;">OR 2. <ol style="list-style-type: none"> a. Containment pressure ≥ 20 psig. <li style="text-align: center;">AND b. Less than one full train of Containment Spray is operating per design for ≥ 15 minutes. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific indications to ensure timely classification.</p> <p>2) Reworded EAL 1.b to be a positive statement</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CA2</p> <p>Initiating Condition: ALERT</p> <p>Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling, Defueled</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Loss of ALL offsite and ALL onsite AC Power to (site-specific emergency buses) for 15 minutes or longer.</p>	<p style="text-align: right;">CA1</p> <p>Initiating Condition:</p> <p>Loss of all offsite and onsite AC power to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. Loss of ALL off-site AC power to unit ESF buses. <p>AND</p> <ol style="list-style-type: none"> 2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses. <p>AND</p> <ol style="list-style-type: none"> 3. Failure to restore power to at least one unit ESF bus in < 15 minutes from the time of loss of both offsite and onsite AC power. 	<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="display: flex; align-items: center;"> <input checked="" type="checkbox"/> No Change </div> <div style="display: flex; align-items: center;"> <input type="checkbox"/> Difference </div> <div style="display: flex; align-items: center;"> <input type="checkbox"/> Deviation </div> </div> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CU2</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling, Defueled</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. a. AC power capability to (site-specific emergency buses) is reduced to a single power source for 15 minutes or longer. <p>AND</p> <ol style="list-style-type: none"> b. Any additional single power source failure will result in loss of all AC power to SAFETY SYSTEMS. 	<p style="text-align: right;">CU1</p> <p>Initiating Condition:</p> <p>Loss of all but one AC power source to emergency buses for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. AC power capability to unit ESF buses reduced to only one of the following power sources for ≥ 15 minutes. <ul style="list-style-type: none"> • Affected unit SAT 142-1(242-1) • Affected unit SAT 142-2(242-2) • Emergency Diesel Generator DG 1A(2A) • Emergency Diesel Generator DG 1B(2B) • Unit crosstie breakers <p>AND</p> <ol style="list-style-type: none"> 2. Any additional single power source failure will result in a loss of ALL AC power to SAFETY SYSTEMS. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 2px 5px; text-align: center;">X</div> <div>No Change</div> <div style="border: 1px solid black; padding: 2px 5px; text-align: center;"> </div> <div>Difference</div> <div style="border: 1px solid black; padding: 2px 5px; text-align: center;"> </div> <div>Deviation</div> </div> <p>1) Listed site specific equipment to ensure timely classification.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CA6</p> <p>Initiating Condition – ALERT</p> <p>Hazardous event affecting SAFETY SYSTEM needed for the current operating mode.</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels:</p> <p>1. a. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> ● Seismic event (earthquake) ● Internal or external flooding event ● High winds or tornado strike ● FIRE ● EXPLOSION ● (site-specific hazards) ● Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>b. EITHER of the following:</p> <p>1. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM needed for the current operating mode.</p> <p>OR</p> <p>2. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure needed for the current operating mode.</p>	<p style="text-align: right;">CA2</p> <p>Initiating Condition:</p> <p>Hazardous event affecting SAFETY SYSTEM required for the current operating mode.</p> <p>Operating Mode Applicability:</p> <p>5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: If it is determined that the conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.</p> <p>1. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> ● Seismic event (earthquake) ● Internal or external flooding event ● High winds or tornado strike ● FIRE ● EXPLOSION ● Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>2. EITHER of the following:</p> <p>a. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.</p> <p>OR</p> <p>b. The event has caused VISIBLE DAMAGE to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) No additional site specific hazard noted</p> <p>2) Changed the word "needed" to "required" in the IC and to "required by Technical Specification" in the EAL, to be consistent with terminology used by operators and minimize confusion.</p> <p>3) Added additional note to easily direct the operator to lesser ICs</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CU4</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Loss of Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels:</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <p>Indicated voltage is less than (site-specific bus voltage value) on required Vital DC buses for 15 minutes or longer.</p>	<p style="text-align: right;">CU3</p> <p>Initiating Condition:</p> <p>Loss of Vital DC power for 15 minutes or longer.</p> <p>Operating Mode Applicability:</p> <p>5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Voltage is < 108 VDC on required unit 125 VDC battery buses 111(211) and 112(212) for ≥ 15 minutes.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific voltage and equipment to ensure timely classification.</p> <p>2) Removed the word "indicated" this will allow for an indication problem to not cause confusion on the need to declare.</p>

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<p style="text-align: right;">CU5</p> <p>Initiating Condition: UNUSUAL EVENT</p> <p>Loss of all onsite or offsite communications capabilities</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling, Defuled</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <ol style="list-style-type: none"> 1. Loss of ALL of the following onsite communication methods: (site-specific list of communications method) 2. Loss of ALL of the following ORO communications s) methods: (site-specific list of communications methods) 3. Loss of ALL of the following NRC communications methods: (site-specific list of communications methods) 	<p style="text-align: right;">CU4</p> <p>Initiating Condition:</p> <p>Loss of all onsite or offsite communication capabilities.</p> <p>Operating Mode Applicability:</p> <p>5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. Loss of ALL Table C1 Onsite communications capability affecting the ability to perform routine operations. <p>OR</p> <ol style="list-style-type: none"> 2. Loss of ALL Table C1 Offsite communication capability affecting the ability to perform offsite notifications. <p>OR</p> <ol style="list-style-type: none"> 3. Loss of ALL Table C1 NRC communication capability affecting the ability to perform NRC notifications. <table border="1" data-bbox="804 629 1329 893"> <caption>Table C1 – Communications Capability</caption> <thead> <tr> <th>System</th> <th>Onsite</th> <th>Offsite</th> <th>NRC</th> </tr> </thead> <tbody> <tr> <td>Radios</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant page</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Plant Telephone System</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Commercial Telephones</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>NARS</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>ENS</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>HPN</td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>Satellite phones</td> <td></td> <td>X</td> <td>X</td> </tr> </tbody> </table>	System	Onsite	Offsite	NRC	Radios	X			Plant page	X			Plant Telephone System	X			Commercial Telephones	X	X	X	NARS		X		ENS		X	X	HPN		X	X	Satellite phones		X	X	<div style="display: flex; justify-content: space-around; align-items: center;"> <div><input checked="" type="checkbox"/> No Change</div> <div><input type="checkbox"/> Difference</div> <div><input type="checkbox"/> Deviation</div> </div> <p>1) Listed site specific communications methods to ensure timely classification</p>
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Satellite phones		X	X																																			

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<p style="text-align: right;">CA3</p> <p>Initiating Condition: ALERT</p> <p>Inability to maintain the plant in cold shutdown.</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: The Emergency Director should declare the Alert promptly upon determining that the applicable has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit) for greater than the duration specified in the following table. UNPLANNED RCS pressure increase greater than (site-specific pressure reading). (This EAL does not apply during water-solid plant conditions. [PWR]) <table border="1" data-bbox="107 604 695 857"> <caption>Table: RCS Heat-up Duration Thresholds</caption> <thead> <tr> <th>RCS Status</th><th>Containment Closure Status</th><th>Heat-up Duration</th></tr> </thead> <tbody> <tr> <td>Intact (but not RCS Reduced Inventory [PWR])</td><td>Not Applicable</td><td>60 minutes*</td></tr> <tr> <td rowspan="2">Not Intact (or at reduced inventory [PWR])</td><td>Established</td><td>20 minutes*</td></tr> <tr> <td>Not Established</td><td>0 minutes</td></tr> </tbody> </table> <p>* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, the EAL is not applicable.</p>	RCS Status	Containment Closure Status	Heat-up Duration	Intact (but not RCS Reduced Inventory [PWR])	Not Applicable	60 minutes*	Not Intact (or at reduced inventory [PWR])	Established	20 minutes*	Not Established	0 minutes	<p style="text-align: right;">CA5</p> <p>Initiating Condition:</p> <p>Inability to maintain plant in cold shutdown.</p> <p>Operating Mode Applicability:</p> <p>5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.</p> <ol style="list-style-type: none"> UNPLANNED rise in RCS temperature > 200°F for > Table C2 duration. <p>OR</p> <ol style="list-style-type: none"> UNPLANNED RCS pressure rise > 10 psig as a result of temperature rise. (This EAL does not apply during water- solid plant conditions.) <table border="1" data-bbox="774 645 1314 926"> <caption>Table C2 – RCS Heat-up Duration Thresholds</caption> <thead> <tr> <th>RCS Status</th><th>Containment Closure Status</th><th>Heat-up Duration</th></tr> </thead> <tbody> <tr> <td>Intact</td><td>Not Applicable</td><td>60 minutes*</td></tr> <tr> <td rowspan="2">Not Intact</td><td>Established</td><td>20 minutes*</td></tr> <tr> <td>Not Established</td><td>0 minutes</td></tr> </tbody> </table> <p>OR</p> <table border="1" data-bbox="774 835 1314 926"> <tbody> <tr> <td>Reduced Inventory (<397 ft.)</td><td>Not Established</td><td>0 minutes</td></tr> </tbody> </table> <p>* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, then EAL #1 is <u>not</u> applicable.</p>	RCS Status	Containment Closure Status	Heat-up Duration	Intact	Not Applicable	60 minutes*	Not Intact	Established	20 minutes*	Not Established	0 minutes	Reduced Inventory (<397 ft.)	Not Established	0 minutes	<div style="display: flex; justify-content: space-around; align-items: center;"> <div><input type="checkbox"/> No Change</div> <div><input checked="" type="checkbox"/> Difference</div> <div><input type="checkbox"/> Deviation</div> </div> <ol style="list-style-type: none"> Listed site specific Technical Specification cold shutdown temperature limit to ensure timely classification. Listed site specific pressure reading to enhance timely classification. Added wording relating the temp and press rise to a loss of decay heat removal capability as per the developer notes for PWR's Added the following note, taken from the basis section of the EAL, to bring it to the attention of the SM/ED when using the "procedure matrix" (11x17 quick reference control room document) "A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification."
RCS Status	Containment Closure Status	Heat-up Duration																									
Intact (but not RCS Reduced Inventory [PWR])	Not Applicable	60 minutes*																									
Not Intact (or at reduced inventory [PWR])	Established	20 minutes*																									
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	Not Established	0 minutes																									
Reduced Inventory (<397 ft.)	Not Established	0 minutes																									

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">CU3</p> <p>Initiating Condition: UNUSUAL EVENT UNPLANNED increase in RCS temperature.</p> <p>Operating Mode Applicability: Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> UNPLANNED increase in RCS temperature to greater than (site-specific Technical Specification cold shutdown temperature limit). Loss of ALL RCS temperature and (reactor vessel/RCS [PWR] or RPV [BWR]) level indication for 15 minutes or longer. 	<p style="text-align: right;">CU5</p> <p>Initiating Condition: UNPLANNED rise in RCS temperature.</p> <p>Operating Mode Applicability: 5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.</p> <ol style="list-style-type: none"> UNPLANNED rise in RCS temperature > 200°F due to loss of decay heat removal. <p>OR</p> <ol style="list-style-type: none"> Loss of the following for ≥ 15 minutes. <ul style="list-style-type: none"> ALL RCS temperature indications AND ALL RPV level indications 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific Technical Specification cold shutdown temperature limit to ensure timely classification.</p> <p>2) Changed the word increase to rise in the initiating condition to be consistent with operations language and training.</p> <p>3) Added the following note, taken from the basis section of the EAL, to bring it to the attention of the SM/ED when using the "procedure matrix" (11x17 quick reference control room document) "A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification."</p>

NEI 99-01 Rev 6	Proposed EAL	Justification									
<div><div>CG1</div><div><p>Initiating Condition: GENERAL EMERGENCY</p><p>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory affecting fuel clad integrity with containment challenged.</p><p>Operating Mode Applicability:</p><p>Cold Shutdown, Refueling</p><p>Example Emergency Action Levels: (1 or 2)</p><p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 30 minutes time has been exceeded, or will likely be exceeded.</p><div><div>1. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) vessel level less than (site-specific level) for 30 minutes or longer.</div><div>AND</div><div>b. ANY indication from the Containment Challenge Table</div><div>2. a.. (Reactor vessel/RCS [PWR] or RPV [BWR]) vessel level cannot be monitored for 30 minutes or longer.</div><div>AND</div><div>b. Core uncover is indicated by ANY of the following:</div><div><div>(Site-specific radiation monitor) reading greater than (site-specific value)</div><div>Erratic source range monitor indication [PWR]</div><div>UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover</div><div>(Other site-specific indications)</div></div><div>AND</div><div>c. ANY indication from the Containment Challenge Table).</div></div><div><table><tr><td>Table: Containment Challenge Table</td></tr><tr><td><div><div>(Site-specific radiation monitor) reading greater than (site-specific value)</div><div>Erratic source range monitor indication [PWR]</div><div>UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover</div><div>(Other site-specific indications)</div></div></td></tr><tr><td>* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.</td></tr></table></div></div></div>	Table: Containment Challenge Table	<div><div>(Site-specific radiation monitor) reading greater than (site-specific value)</div><div>Erratic source range monitor indication [PWR]</div><div>UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover</div><div>(Other site-specific indications)</div></div>	* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.	<div><div>CG6</div><div><p>Initiating Condition:</p><p>Loss of reactor vessel / RCS inventory affecting fuel clad integrity with containment challenged.</p><p>Operating Mode Applicability:</p><p>5, 6</p><p>Emergency Action Levels (EAL):</p><p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p><div><div>1. a. RVLIS indicates 0% Plenum for ≥ 30 minutes.</div><div>OR</div><div>Reactor Vessel Refueling Level Indicators LT-046 and LT-049 < 392 ft. el. for ≥ 30 minutes.</div><div>AND</div><div>b. ANY Containment Challenge Indication (Table C4)</div><div>OR</div><div>2. a. Reactor vessel / RCS level <u>cannot</u> be monitored for ≥ 30 minutes.</div><div>AND</div><div>b. Core uncover is indicated by ANY of the following:</div><div><div>Table C3 indications.</div><div>OR</div><div>Erratic Source Range Neutron Monitor indication.</div><div>OR</div><div>1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors</div><div>> 3000 mR/hr.</div></div><div>AND</div><div>c. Any Containment Challenge Indication (Table C4)</div></div><div><table><tr><td>Table C3 Indications of RCS Leakage</td></tr><tr><td><div><div>UNPLANNED Containment Sump level rise*</div><div>UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>UNPLANNED Tank level rise*</div><div>UNPLANNED rise in RCS makeup</div><div>Observation of leakage or inventory loss</div></div></td></tr><tr><td>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</td></tr></table><table><tr><td>Table C4 – Containment Challenge Indications</td></tr><tr><td><div><div>Hydrogen Concentration in Containment ≥ 5%</div><div>UNPLANNED rise in containment pressure</div><div>CONTAINMENT CLOSURE <u>not</u> established</div></div></td></tr><tr><td>* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.</td></tr></table></div></div></div>	Table C3 Indications of RCS Leakage	<div><div>UNPLANNED Containment Sump level rise*</div><div>UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>UNPLANNED Tank level rise*</div><div>UNPLANNED rise in RCS makeup</div><div>Observation of leakage or inventory loss</div></div>	*Rise in level is attributed to a loss of reactor vessel/RCS inventory.	Table C4 – Containment Challenge Indications	<div><div>Hydrogen Concentration in Containment ≥ 5%</div><div>UNPLANNED rise in containment pressure</div><div>CONTAINMENT CLOSURE <u>not</u> established</div></div>	* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.	<div><div><div><input type="checkbox"/> No Change</div><div><input checked="" type="checkbox"/> Difference</div><div><input type="checkbox"/> Deviation</div></div><div><p>1) Listed site specific values for level, developer notes indicate the level to be approximately Top of Active Fuel. The min indicated level of the transmitters LT-046 and 049 is 392 ft el. A level of 392 ft el along with RVLIS indicating 0% is being used as the lowest readable level . And allows for an escalation from CS6.</p><p>2) Listed site specific levels, radiation monitors, and sumps and tanks to ensure timely classification.</p><p>3) Listed Explosive mixture in the Containment Challenge Table to ensure timely classification.</p></div></div>
Table: Containment Challenge Table											
<div><div>(Site-specific radiation monitor) reading greater than (site-specific value)</div><div>Erratic source range monitor indication [PWR]</div><div>UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover</div><div>(Other site-specific indications)</div></div>											
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<div><div>UNPLANNED Containment Sump level rise*</div><div>UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>UNPLANNED Tank level rise*</div><div>UNPLANNED rise in RCS makeup</div><div>Observation of leakage or inventory loss</div></div>											
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* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.											

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<div>CS1</div> <div>Initiating Condition: SITE AREA EMERGENCY</div> <div>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory affecting core decay heat removal capability.</div> <div>Operating Mode Applicability:</div> <div>Cold Shutdown, Refueling</div> <div>Example Emergency Action Levels: (1 or 2 or 3)</div> <div>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 30 minutes time has been exceeded, or will likely be exceeded.</div> <div>1. a. CONTAINMENT CLOSURE not established.</div> <div>AND</div> <div>b. (Reactor vessel/RCS [PWR] or RPV [BWR]) level less than (site-specific level).</div> <div>2. a. CONTAINMENT CLOSURE established.</div> <div>AND</div> <div>b. (Reactor vessel/RCS [PWR] or RPV [BWR]) level less than (site-specific level).</div> <div>3. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored for 30 minutes or longer.</div> <div>AND</div> <div>b. Core uncover is indicated by ANY of the following:</div> <div><div>(Site-specific radiation monitor) reading greater than (site-specific value)</div><div>Erratic source range monitor indication [PWR]</div><div>UNPLANNED increase in (site-specific sump and/or tank levels) of sufficient magnitude to indicate core uncover</div><div>(Other site-specific indications)</div></div>	<div>CS6</div> <div>Initiating Condition:</div> <div>Loss of reactor vessel / RCS inventory affecting core decay heat removal capabilities.</div> <div>Operating Mode Applicability:</div> <div>5, 6</div> <div>Emergency Action Levels (EAL):</div> <div>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</div> <div>1. With CONTAINMENT CLOSURE established EITHER:</div> <div>a. RVLIS indicates 0% Plenum</div> <div>OR</div> <div>b. Reactor Vessel Refueling Level Indicators LT-046 and LT-049 < 392 ft el.</div> <div>OR</div> <div>2. With CONTAINMENT CLOSURE not established EITHER:</div> <div>a. RVLIS ≤ 15% Plenum.</div> <div>OR</div> <div>b. Reactor Vessel Refueling Level Indicators LT-046 and LT-049 < 393 ft. el.</div> <div>OR</div> <div>3. a. Reactor vessel / RCS level cannot be monitored for ≥30 minutes.</div> <div>AND</div> <div>b. Core uncover is indicated by any of the following:</div> <div><div>Table C3 indications.</div><div>OR</div><div>Erratic Source Range Neutron Monitor indication.</div><div>OR</div><div>1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors > 3000 mR/hr.</div></div> <div>Table C3 Indications of RCS Leakage</div> <div><div>UNPLANNED Containment Sump level rise*</div><div>UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>UNPLANNED Tank (rad waste) level rise*</div><div>UNPLANNED rise in RCS makeup</div><div>Observation of leakage or inventory loss</div></div> <div>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</div>	<div><div>No Change</div><div>X Difference</div><div>Deviation</div></div> <div>1) Listed site specific values for level, developer notes indicate the level to be approximately Top of Active Fuel. The min indicated level of the transmitters LT-046 and 049 is 392 ft el. A level of 392 ft el along with RVLIS indicating 0% is being used as the lowest readable level. And allows for an escalation from CA6.</div> <div>2) For Containment closure not established developer notes indicate the level to be 6" below the bottom ID of the RCS loop where it enters the vessel. This level is 391.9' and is below the min indicated level of the transmitters LT-046 and 049, which is 392 ft el. a level of 393 ft el. was chosen as well as ≤ 15% Plenum (the bottom of the hot leg) this is within the indicated range of the instrument, it also represents a substantial degradation of the condition from the CA6 level criteria and allows for escalation to CG6 as well as lowing for a Containment closure established level,</div> <div>3) Listed site specific radiation monitors to ensure timely classification</div> <div>4) Listed site specific sumps and tanks to ensure timely classification</div>

NEI 99-01 Rev 6	Proposed EAL	Justification			
<div>CA1</div> <p>Initiating Condition: ALERT</p> <p>Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory</p> <p>Operating Mode Applicability:</p> <p>Cold Shutdown, Refueling</p> <p>Example Emergency Action Levels: (1 or 2)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes time has been exceeded, or will likely be exceeded.</p> <div><div>1. Loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory as indicated by level less than (site-specific level).</div><div><div>2. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored for 15 minutes or longer</div><div><div>AND</div><div>b. UNPLANNED increase in (site-specific sump and/or tank) levels due to a loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory.</div></div></div></div>	<div>CA6</div> <p>Initiating Condition:</p> <p>Loss of reactor vessel / RCS inventory</p> <p>Operating Mode Applicability:</p> <p>5, 6</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <div><div>1. a. Loss of reactor vessel / RCS inventory as indicated RVLIS < 37% Plenum.</div><div><div>OR</div><div>b. Loss of reactor vessel / RSC inventory as indicated by LT-046 and LT-049 < 393.4 ft. el.</div></div></div> <div><div>OR</div><div>2. a. Reactor vessel / RCS level <u>cannot</u> be monitored for <u>≥ 15 minutes</u>.</div><div><div>AND</div><div>b. Loss of reactor vessel / RCS inventory per Table C3 indications.</div></div></div> <table><tr><th>Table C3 Indications of RCS Leakage</th></tr><tr><td><div><div>• UNPLANNED Containment Sump level rise*</div><div>• UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>• UNPLANNED Tank (rad waste) level rise*</div><div>• UNPLANNED rise in RCS makeup</div><div>• Observation of leakage or inventory loss</div></div></td></tr><tr><td>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</td></tr></table>	Table C3 Indications of RCS Leakage	<div><div>• UNPLANNED Containment Sump level rise*</div><div>• UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>• UNPLANNED Tank (rad waste) level rise*</div><div>• UNPLANNED rise in RCS makeup</div><div>• Observation of leakage or inventory loss</div></div>	*Rise in level is attributed to a loss of reactor vessel/RCS inventory.	<div><div><input type="checkbox"/> No Change</div><div><input checked="" type="checkbox"/> Difference</div><div><input type="checkbox"/> Deviation</div></div> <p>1) Listed site specific levels to ensure timely classification. The developer notes indicate the levels to correspond to the level required to support RHR pump operation, IAW BwOA PRI-10 (LOSS OF RH COOLING) RCS levels of > 37% or 393.4' on LT-046 and LT -049 as necessary to maintain RH pumps operating at reduced inventory conditions. These levels were chosen to be consistent with the developer notes and the site abnormal operating procedures.</p> <p>2) Listed site specific sumps and tanks to ensure timely classification.</p>
Table C3 Indications of RCS Leakage					
<div><div>• UNPLANNED Containment Sump level rise*</div><div>• UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>• UNPLANNED Tank (rad waste) level rise*</div><div>• UNPLANNED rise in RCS makeup</div><div>• Observation of leakage or inventory loss</div></div>					
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.					

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<div>CU1</div> <div>Initiating Condition: UNUSUAL EVENT</div> <div>UNPLANNED loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory for 15 minutes or longer.</div> <div>Operating Mode Applicability:</div> <div>Cold Shutdown, Refueling</div> <div>Example Emergency Action Levels: (1 or 2)</div> <div>Note: The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.</div> <div><div>1. UNPLANNED loss of reactor coolant results in (reactor vessel/RCS [PWR] or RPV [BWR]) level less than a required lower limit for 15 minutes or longer.</div><div>2. a. (Reactor vessel/RCS [PWR] or RPV [BWR]) level cannot be monitored.</div></div> <div>AND</div> <div>b. UNPLANNED increase in (site-specific sump and/or tank) levels.</div>	<div>CU6</div> <div>Initiating Condition:</div> <div>UNPLANNED loss of reactor vessel / RCS inventory for 15 minutes or longer.</div> <div>Operating Mode Applicability:</div> <div>5, 6</div> <div>Emergency Action Levels (EAL):</div> <div>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</div> <div><div>1. UNPLANNED loss of reactor coolant results in the inability to restore and maintain reactor vessel / RCS level to > procedurally established lower limit for ≥15 minutes.</div></div> <div>OR</div> <div><div>2. a. Reactor vessel / RCS level cannot be monitored.</div></div> <div>AND</div> <div>b. Loss of reactor vessel / RCS inventory per Table C3 indications.</div> <div><table><tr><th>Table C3 Indications of RCS Leakage</th></tr><tr><td><div><div>• UNPLANNED Containment Sump level rise*</div><div>• UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>• UNPLANNED Tank (rad waste) level rise*</div><div>• UNPLANNED rise in RCS makeup</div><div>• Observation of leakage or inventory loss</div></div></td></tr><tr><td>*Rise in level is attributed to a loss of reactor vessel/RCS inventory.</td></tr></table></div>	Table C3 Indications of RCS Leakage	<div><div>• UNPLANNED Containment Sump level rise*</div><div>• UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>• UNPLANNED Tank (rad waste) level rise*</div><div>• UNPLANNED rise in RCS makeup</div><div>• Observation of leakage or inventory loss</div></div>	*Rise in level is attributed to a loss of reactor vessel/RCS inventory.	<div><div><div></div>No Change</div><div><div>X</div>Difference</div><div><div></div>Deviation</div></div> <div>1) Listed site specific sumps and tanks to ensure timely classification.</div> <div>2) Described "a required lower limit" as a procedurally established lower limit, and listed site specific sumps and tanks to ensure timely classification.</div>
Table C3 Indications of RCS Leakage					
<div><div>• UNPLANNED Containment Sump level rise*</div><div>• UNPLANNED Auxiliary Bldg. Sump level rise*</div><div>• UNPLANNED Tank (rad waste) level rise*</div><div>• UNPLANNED rise in RCS makeup</div><div>• Observation of leakage or inventory loss</div></div>					
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.					

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: GENERAL EMERGENCY HG1</p> <p>HOSTILE ACTION resulting in loss of physical control of the facility.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>1. a. A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-specific security shift supervision).</p> <p style="padding-left: 40px;">AND</p> <p style="padding-left: 40px;">b. EITHER of the following:</p> <p style="padding-left: 80px;">1. ANY of the following safety functions cannot be controlled or maintained.</p> <ul style="list-style-type: none"> ▪ Reactivity control ▪ Core cooling [<i>PWR</i>] / RPV water level [<i>BWR</i>] ▪ RCS heat removal <p style="padding-left: 80px;">OR</p> <p style="padding-left: 80px;">2. Damage to spent fuel has occurred or is IMMINENT</p>	<p>Initiating Condition: HG1</p> <p>HOSTILE ACTION resulting in loss of physical control of the facility.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>1. A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.</p> <p style="padding-left: 40px;">AND</p> <p>2. a. ANY Table H1 safety function <u>cannot</u> be controlled or maintained.</p> <p style="padding-left: 80px;">OR</p> <p style="padding-left: 80px;">b. Damage to spent fuel has occurred or is IMMINENT</p> <div style="border: 1px solid black; padding: 10px; margin: 10px auto; width: fit-content;"> <p style="text-align: center;">Table H1 – Safety Functions</p> <ul style="list-style-type: none"> • Reactivity Control (ability to shutdown the reactor and keep it shutdown) • Core Cooling (ability to cool the core) • RCS Heat Removal (ability to maintain a heatsink) </div>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) List site security shift supervision as Security Force.</p> <p>2) Added descriptors to better explain each safety function and allow for a timely classification.</p>

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<div data-bbox="71 219 720 247">Initiating Condition: SITE AREA EMERGENCY HS1</div> <div data-bbox="71 297 720 322">HOSTILE ACTION within the Protected Area.</div> <div data-bbox="71 346 720 371">Operating Mode Applicability:</div> <div data-bbox="71 396 720 421">All</div> <div data-bbox="71 446 720 470">Example Emergency Action Levels:</div> <div data-bbox="71 495 720 536">A HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA as reported by the (site-security shift supervision).</div>	<div data-bbox="720 219 1367 247">Initiating Condition: HS1</div> <div data-bbox="720 297 1367 322">HOSTILE ACTION within the Protected Area.</div> <div data-bbox="720 346 1367 371">Operating Mode Applicability:</div> <div data-bbox="720 396 1367 421">1, 2, 3, 4, 5, 6, D</div> <div data-bbox="720 446 1367 470">Emergency Action Levels (EAL):</div> <div data-bbox="720 495 1367 536">A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.</div>	<div data-bbox="1367 219 2020 272"><input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation</div> <div data-bbox="1367 305 2020 330">1) List site security shift supervision as Security Force.</div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HA1</p> <p>Initiating Condition: ALERT</p> <p>HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2)</p> <ol style="list-style-type: none"> 1. A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the (site-specific security shift supervision). 2. A validated notification from NRC of an aircraft attack threat within 30 minutes of the site. 	<p style="text-align: right;">HA1</p> <p>Initiating Condition:</p> <p>HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. A validated notification from NRC of an aircraft attack threat < 30 minutes from the site. <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. Notification by the Security Force that a HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA. 	<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="display: flex; align-items: center;"> <input checked="" type="checkbox"/> No Change <input type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> </div> <p>1) List site security shift supervision as Security Force.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT HU1</p> <p>Confirmed SECURITY CONDITION or threat.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2 or 3)</p> <ol style="list-style-type: none"> 1. A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the (site-specific security shift supervision). 2. Notification of a credible security threat directed at the site. 3. A validated notification from the NRC providing information of an aircraft threat. 	<p>Initiating Condition: HU1</p> <p>Confirmed SECURITY CONDITION or threat.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <ol style="list-style-type: none"> 1. Notification of a credible security threat directed at the site as determined per SY-AA-101-132, Security Assessment and Response to Unusual Activities. <p>OR</p> <ol style="list-style-type: none"> 2. A validated notification from the NRC providing information of an aircraft threat. <p>OR</p> <ol style="list-style-type: none"> 3. Notification by the Security Force of a SECURITY CONDITION that does <u>not</u> involve a HOSTILE ACTION. 	<p> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </p> <p>1) List site security shift supervision as Security Force.</p> <p>2) Further described credible security threat through listing a site specific procedure.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<div data-bbox="621 227 659 244" data-label="Text">HS6</div> <p data-bbox="79 252 457 269">Initiating Condition: SITE AREA EMERGENCY</p> <p data-bbox="79 302 621 318">Inability to control a key safety function from outside the Control Room.</p> <p data-bbox="79 351 323 368">Operating Mode Applicability:</p> <p data-bbox="79 401 100 417">All</p> <p data-bbox="79 450 466 467">Example Emergency Action Levels: (1 and 2)</p> <p data-bbox="79 484 705 525">Note: The Emergency Director should declare the event promptly upon determining that (site-specific number of minutes) has been exceeded, or will likely be exceeded.</p> <ol data-bbox="79 558 688 756" style="list-style-type: none"> 1. An event has resulted in plant control being transferred from the Control Room to (site-specific remote shutdown panels and local control stations). 2. Control of ANY of the following key safety functions is not reestablished within (site-specific number of minutes). <ul style="list-style-type: none"> ▪ Reactivity control ▪ Core cooling [PWR] / RPV water level [BWR] ▪ RCS heat removal 	<div data-bbox="1268 227 1306 244" data-label="Text">HS2</div> <p data-bbox="730 252 894 269">Initiating Condition:</p> <p data-bbox="730 302 1268 318">Inability to control a key safety function from outside the Control Room.</p> <p data-bbox="730 351 974 368">Operating Mode Applicability:</p> <p data-bbox="730 401 858 417">1, 2, 3, 4, 5, 6, D</p> <p data-bbox="730 450 995 467">Emergency Action Levels (EAL):</p> <p data-bbox="730 484 1346 541">Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol data-bbox="730 558 1331 698" style="list-style-type: none"> 1. A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BWOA PRI-5, Control Room Inaccessibility. <p data-bbox="768 629 806 645">AND</p> <ol data-bbox="730 657 1323 698" style="list-style-type: none"> 2. Control of ANY Table H1 key safety function is <u>not</u> reestablished in < 15 minutes. <div data-bbox="816 761 1272 959"> <p data-bbox="930 773 1157 789">Table H1 – Safety Functions</p> <ul style="list-style-type: none"> • Reactivity Control (ability to shutdown the reactor and keep it shutdown) • Core Cooling (ability to cool the core) • RCS Heat Removal (ability to maintain a heatsink) </div>	<div data-bbox="1381 236 1940 277"> <input data-bbox="1381 236 1423 277" type="checkbox"/> No Change <input checked="" data-bbox="1606 236 1648 277" type="checkbox"/> Difference <input data-bbox="1801 236 1843 277" type="checkbox"/> Deviation </div> <p data-bbox="1381 318 2003 417">1) EAL uses the site specific Control Room evacuation procedure to effectively list all of the alternate locations, panels, and stations requested by the developer notes. This would be the procedure the Control Room would enter should such an event occur, this allows for greater clarity as to when this EAL would apply than if each panel and station used in alternate shutdown were to be listed,</p> <p data-bbox="1381 442 1990 484">2) Added descriptors to better explain each safety function and allow for a timely classification.</p> <p data-bbox="1381 500 1976 566">3) Changed "An event" to "A Control Room evacuation" to remove confusion if partial plant control was transferred to outside the control room with the control room still manned, due to testing or equipment failure.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HA6</p> <p>Initiating Condition: ALERT</p> <p>Control Room evacuation resulting in transfer of plant control to alternate locations.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: An event has resulted in plant control being transferred from the Control Room to (site-specific remote shutdown panels and local control stations).</p>	<p style="text-align: right;">HA2</p> <p>Initiating Condition:</p> <p>Control Room evacuation resulting in transfer of plant control to alternate locations.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL): A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BwOA PRI-5, Control Room Inaccessibility.</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) EAL uses the site specific Control Room evacuation procedure to effectively list all of the alternate locations, panels, and stations requested by the developer notes. This would be the procedure the Control Room would enter should such an event occur, this allows for greater clarity as to when this EAL would apply than if each panel and station used in alternate shutdown were to be listed,</p> <p>2) Changed "An event" to "A Control Room evacuation" to remove confusion if partial plant control was transferred to outside the control room with the control room still manned, due to testing or equipment failure.</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT HU4</p> <p>FIRE potentially degrading the level of safety of the plant.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2 or 3 or 4)</p> <p>Note: The Emergency Director should declare the Unusual Event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <ol style="list-style-type: none"> 1. a. A FIRE is NOT extinguished within 15-minutes of ANY of the following FIRE detection indications: <ul style="list-style-type: none"> • Report from the field (i.e., visual observation) • Receipt of multiple (more than 1) fire alarms or indications • Field verification of a single fire alarm <p style="text-align: center;">AND</p> b. The FIRE is located within ANY of the following plant rooms or areas: (site-specific list of plant rooms or areas) 2. a. Receipt of a single fire alarm (i.e., no other indications of a FIRE). AND b. The FIRE is located within ANY of the following plant rooms or areas: (site-specific list of plant rooms or areas) AND c. The existence of a FIRE is not verified within 30-minutes of alarm receipt. 3. A FIRE within the plant or ISFSI [for plants with an ISFSI outside the plant Protected Area] PROTECTED AREA not extinguished within 60-minutes of the initial report, alarm or indication. 4. A FIRE within the plant or ISFSI [for plants with an ISFSI outside the plant Protected Area] PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish. 	<p>Initiating Condition: HU3</p> <p>FIRE potentially degrading the level of safety of the plant.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.</p> <p>Escalation of the emergency classification level would be via IC CA2 or MA5</p> <ol style="list-style-type: none"> 1. a. A FIRE in any Table H2 area is <u>not</u> extinguished in <15-minutes of ANY of the following FIRE detection indications: <ul style="list-style-type: none"> • Report from the field (i.e., visual observation) • Receipt of multiple (more than 1) fire alarms or indications • Field verification of a single fire alarm <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">Table H2 – Vital Areas</p> <ul style="list-style-type: none"> • Containment • Auxiliary Building • Fuel Handling Building • Main Steam Tunnels • RWST's • Condensate Storage Tanks • Lake Screen House </div> <p>OR</p> <ol style="list-style-type: none"> 2. a. Receipt of a single fire alarm in any Table H2 area (i.e., no other indications of a FIRE). AND b. The existence of a FIRE is not verified in <30-minutes of alarm receipt. OR 3. A FIRE within the plant PROTECTED AREA not extinguished in <60-minutes of the initial report, alarm or indication. OR 4. A FIRE within the plant PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific list of plant rooms or areas that contain SAFETY SYSTEM equipment to ensure timely classification.</p> <p>2) The site ISFSI is located within the Plant Protected Area and as such is not specifically addressed in EAL #3 and #4. This is in accordance with the EAL developer notes.</p> <p>3) Added additional note to easily direct the operator to the escalation ICs</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT HU2</p> <p>Seismic event greater than OBE levels.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Seismic event greater than Operating Basis Earthquake (OBE) as indicated by:</p> <p>a. (site-specific indication that a seismic event met or exceeded OBE limits)</p>	<p>Initiating Condition: HU4</p> <p>Seismic event greater than OBE levels.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: Escalation of the emergency classification level would be via IC CA2 or MA5</p> <p>For emergency classification if EAL 2.b is not able to be confirmed, then the occurrence of a seismic event is confirmed in manner deemed appropriate by the Shift Manager or Emergency Director in ≤ 15 mins of the event.</p> <p>1. Seismic event > Operating Basis Earthquake (OBE) as indicated by seismic check at panel 0PA02J.</p> <p>OR</p> <p>2. When Seismic Monitoring Equipment is not available:</p> <p>a. Control Room personnel feel an actual or potential seismic event.</p> <p>AND</p> <p>b. ANY one of the following confirmed in ≤ 15 mins of the event:</p> <ul style="list-style-type: none"> • The earthquake resulted in Modified Mercalli Intensity (MMI) ≥ VI and occurred ≤ 3.5 miles of the plant. • The earthquake was magnitude ≥ 6.0 • The earthquake was magnitude ≥ 5.0 and occurred ≤ 125 miles of the plant. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) Listed site specific indication to determining OBE limits have been met or exceeded to ensure timely classification.</p> <p>2) The seismic panel is located in the Auxiliary Electrical Equipment Room (AEER) which is adjacent to the Main Control Room (MCR) – There is one security card reader door between the AEER and MCR. There is an indicating light (OBE EXCEEDED) on front of 0PA02J which illuminates when Operating Basis Earthquake has been exceeded. The approximate time required to get to this panel and provide the indication to the control room is as follows: Need to obtain a key for cabinet – 2 minutes Walk back to the room – 1 minute Get into the cabinet and look – 1 minute Approximately 4 mins total</p> <p>3) Developed a compensatory EAL for use during periods when the seismic monitoring system capable of detecting an OBE is out of service for maintenance or repair using the guidance in the developer notes provided.</p> <p>4) Added additional compensatory thresholds based on the guidance provided in US NRC Reg. Guide 1.166, Pre-Earthquake Planning and Immediate Nuclear Power Plant Operator Earthquake Actions Appendix A, also added a 15 min time limit to ensure timely classification when these additional thresholds may not be readily available.</p> <p>5) Added additional notes to easily direct the operator to the escalation ICs, as well as to ensure if unable to determine size of earthquake IAW 2.b then the SM / ED will determine classification within 15 mins of the event</p>

NEI 99-01 Rev 6	Proposed EAL	Justification										
<div>HA5</div> <div>Initiating Condition: ALERT</div> <div>Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.</div> <div>Operating Mode Applicability:</div> <div>All</div> <div>Example Emergency Action Levels:</div> <div>Note: If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.</div> <div>1. a. Release of a toxic, corrosive, asphyxiant or flammable gas into any of the following plant rooms or areas: (site-specific list of plant rooms or areas with entry-related mode applicability identified)</div> <div>AND</div> <div>b. Entry into the room or area is prohibited or impeded.</div>	<div>HA5</div> <div>Initiating Condition:</div> <div>Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.</div> <div>Operating Mode Applicability:</div> <div>4, 5, 6</div> <div>Emergency Action Levels (EAL):</div> <div>Note: If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.</div> <div>1. Release of a toxic, corrosive, asphyxiant or flammable gas in a Table H3 area.</div> <div><table><tr><th colspan="2">Table H3 Areas with Entry Related Mode Applicability</th></tr><tr><th>Area</th><th>Entry Related Mode Applicability</th></tr><tr><td>Auxiliary Building 426' VCT Valve Aisle</td><td rowspan="5">Mode 4, 5, and 6</td></tr><tr><td>Auxiliary Building 401' Curved Wall Area Penetration Area</td></tr><tr><td>Auxiliary Building 383' Remote Shutdown Panel Area</td></tr><tr><td>Auxiliary Building 364' CV Pp areas Curved Wall Area</td></tr><tr><td>Auxiliary Building 346' RH pump areas</td></tr></table></div> <div>AND</div> <div>2. Entry into the room or area is prohibited or impeded.</div>	Table H3 Areas with Entry Related Mode Applicability		Area	Entry Related Mode Applicability	Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6	Auxiliary Building 401' Curved Wall Area Penetration Area	Auxiliary Building 383' Remote Shutdown Panel Area	Auxiliary Building 364' CV Pp areas Curved Wall Area	Auxiliary Building 346' RH pump areas	<div><div><input type="checkbox"/></div><div>No Change</div><div><input checked="" type="checkbox"/></div><div>Difference</div><div><input type="checkbox"/></div><div>Deviation</div></div> <div>1) Listed plant specific rooms and areas with entry related mode applicability to ensure timely classification.</div> <div>2) The Operating Mode Applicability of this EAL has been revised from All Modes to modes 4, 5, and 6 due to the mode applicability of the areas of concern in Table H-3.</div>
Table H3 Areas with Entry Related Mode Applicability												
Area	Entry Related Mode Applicability											
Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6											
Auxiliary Building 401' Curved Wall Area Penetration Area												
Auxiliary Building 383' Remote Shutdown Panel Area												
Auxiliary Building 364' CV Pp areas Curved Wall Area												
Auxiliary Building 346' RH pump areas												

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT HU3</p> <p>Hazardous Event</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: (1 or 2 or 3 or 4)</p> <p>Note: EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.</p> <ol style="list-style-type: none"> 1. A tornado strike within the PROTECTED AREA. 2. Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component needed for the current operating mode. 3. Movement of personnel within the PROTECTED AREA is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release). 4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles. 5. (Site-specific list of natural or technological hazard events) 	<p>Initiating Condition: HU6</p> <p>Hazardous Event</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Note: EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.</p> <p>Escalation of the emergency classification level would be via IC CA2 or MA5</p> <ol style="list-style-type: none"> 1. Tornado strike within the PROTECTED AREA. <p>OR</p> <ol style="list-style-type: none"> 2. Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component required by Technical Specifications for the current operating mode. <p>OR</p> <ol style="list-style-type: none"> 3. Movement of personnel within the PROTECTED AREA is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release). <p>OR</p> <ol style="list-style-type: none"> 4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> No Change <input checked="" type="checkbox"/> Difference <input type="checkbox"/> Deviation </div> <p>1) No site specific list of natural or technological hazard events was noted.</p> <p>2) Changed the word "needed" to "required by Technical Specifications" in the EAL to be consistent with terminology used by operators and minimize confusion.</p> <p>3) Added additional note to easily direct the operator to the escalation ICs</p>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HG7</p> <p>Initiating Condition: GENERAL EMERGENCY</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or IMMINENT substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area.</p>	<p style="text-align: right;">HG7</p> <p>Initiating Condition:</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a General Emergency.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL): Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or IMMINENT substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area..</p>	<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> X </div> <div style="text-align: center;"> <input type="checkbox"/> No Change </div> <div style="text-align: center;"> <input type="checkbox"/> Difference </div> <div style="text-align: center;"> <input type="checkbox"/> Deviation </div> </div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HS7</p> <p>Initiating Condition: SITE AREA EMERGENCY</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels: Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the 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.</p>	<p style="text-align: right;">HS7</p> <p>Initiating Condition:</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a Site Area Emergency.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL): Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the 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.</p>	<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> No Change </div> <div style="text-align: center;"> <input type="checkbox"/> Difference </div> <div style="text-align: center;"> <input type="checkbox"/> Deviation </div> </div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p style="text-align: right;">HA7</p> <p>Initiating Condition: ALERT</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.</p>	<p style="text-align: right;">HA7</p> <p>Initiating Condition:</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of an Alert.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.</p>	<div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> X </div> <div>No Change</div> <div style="text-align: center;"> <input type="checkbox"/> </div> <div>Difference</div> <div style="text-align: center;"> <input type="checkbox"/> </div> <div>Deviation</div> </div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT HU7</p> <p>Other conditions existing which in the judgment of the Emergency director warrant declaration of an UNUSUAL EVENT.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.</p>	<p>Initiating Condition: HU7</p> <p>Other conditions existing which in the judgment of the Emergency director warrant declaration of an UNUSUAL EVENT.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.</p>	<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;"> <input checked="checked" type="checkbox"/> No Change </div> <div style="text-align: center;"> <input type="checkbox"/> Difference </div> <div style="text-align: center;"> <input type="checkbox"/> Deviation </div> </div>

NEI 99-01 Rev 6	Proposed EAL	Justification
<p>Initiating Condition: UNUSUAL EVENT E-HU1</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY.</p> <p>Operating Mode Applicability:</p> <p>All</p> <p>Example Emergency Action Levels:</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading greater than (2 times the site-specific cask specific technical specification allowable radiation level) on the surface of the spent fuel cask.</p>	<p>Initiating Condition: E-HU1</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY.</p> <p>Operating Mode Applicability:</p> <p>1, 2, 3, 4, 5, 6, D</p> <p>Emergency Action Levels (EAL):</p> <p>Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading:</p> <ul style="list-style-type: none"> • > 40 mr/hr (gamma + neutron) on the top of the spent fuel cask <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • > 220 mr/hr (gamma + neutron) on the side of the spent fuel cask, excluding inlet and outlet ducts. 	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 2px 5px; text-align: center;">X</div> <div>No Change</div> <div style="border: 1px solid black; padding: 2px 5px; text-align: center;"> </div> <div>Difference</div> <div style="border: 1px solid black; padding: 2px 5px; text-align: center;"> </div> <div>Deviation</div> </div> <p>1) Listed 2x the site specific cask specific allowable radiation level as per the Certificate of Compliance No. 1014 Appendix A Section 5.7</p>

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RG1**Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 1000 mRem TEDE or 5000 mRem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
 - If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
 - Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
 - The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.
1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) **> 3.87 E+09 μ Ci/sec** for **\geq 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).
- OR**
2. Dose assessment Using actual meteorology indicates doses at or beyond the site boundary of **EITHER:**
 - a. **> 1000 mRem TEDE**

OR

 - b. **> 5000 mRem CDE Thyroid**

OR

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RG1 (cont)

Emergency Action Level (EAL) (cont):

3. Field survey results at or beyond the site boundary indicate **EITHER**:

- a. Gamma (closed window) dose rates **>1000 mRem/hr** are expected to continue for **≥ 60 minutes**.

OR

- b. Analyses of field survey samples indicate **> 5000 mRem CDE Thyroid** for **60 minutes** of inhalation.

Basis:

This IC addresses a release of gaseous radioactivity that results in projected or actual offsite doses greater than or equal to the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude will require implementation of protective actions for the public.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at the EPA PAG of 1000 mRem while the 5000 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Basis Reference(s):

1. NEI 99-01 Rev 6, AG1
2. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
3. EP-AA-112-500 Emergency Environmental Monitoring

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RS1**Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 100 mRem TEDE or 500 mRem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
 - If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
 - Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
 - The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.
1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) **> 3.87 E+08 μ Ci/sec** for **≥ 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).
- OR**
2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of **EITHER:**
- a. **> 100 mRem TEDE**
- OR**
- b. **> 500 mRem CDE Thyroid**
- OR**
3. Field survey results at or beyond the site boundary indicate **EITHER:**
- a. Gamma (closed window) dose rates **>100 mR/hr** are expected to continue for **≥ 60 minutes**.
- OR**
- b. Analyses of field survey samples indicate **> 500 mRem CDE Thyroid** for **60 minutes** of inhalation.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RS1 (cont)

Basis:

This IC addresses a release of gaseous radioactivity that results in projected or actual offsite doses greater than or equal to 10% of the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude are associated with the failure of plant systems needed for the protection of the public.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at 10% of the EPA PAG of 1000 mRem while the 500 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Escalation of the emergency classification level would be via IC RG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, AS1
2. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
3. EP-AA-112-500 Emergency Environmental Monitoring

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA1**Initiating Condition:**

Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mRem TEDE or 50 mRem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
- Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
- The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.

1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) **> 3.87 E+07 μ Ci/sec** for **≥ 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of **EITHER**:

- a. **> 10 mRem TEDE**

OR

- b. **> 50 mRem CDE Thyroid**

OR

3. Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than **EITHER** of the following at or beyond the site boundary

- a. **10 mRem TEDE for 60 minutes** of exposure

OR

- b. **50 mRem CDE Thyroid for 60 minutes** of exposure

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA1 (cont)

Emergency Action Level (EAL) (cont):

OR

4. Field survey results at or beyond the site boundary indicate **EITHER**:

- a. Gamma (closed window) dose rates **> 10 mR/hr** are expected to continue for **≥ 60 minutes**.

OR

- b. Analyses of field survey samples indicate **> 50 mRem CDE** Thyroid for **60 minutes** of inhalation.

Basis:

This IC addresses a release of gaseous or liquid radioactivity that results in projected or actual offsite doses greater than or equal to 1% of the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude represent an actual or potential substantial degradation of the level of safety of the plant as indicated by a radiological release that significantly exceeds regulatory limits (e.g., a significant uncontrolled release).

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at 1% of the EPA PAG of 1000 mRem while the 50 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

This EAL includes any release for which a radioactivity discharge permit was not prepared, or a release that exceeds the conditions (e.g., minimum dilution flow, maximum discharge flow, alarm setpoints, etc.) on the applicable permit.

Escalation of the emergency classification level would be via IC RS1.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

Basis Reference(s):

1. NEI 99-01 Rev 6, AA1
2. ODCM Section 12.3 Liquid Effluents
3. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
4. EP-EAL-0618 Rev. 0, Braidwood Criteria for Choosing Radiological Liquid Effluents EAL Threshold Values
5. 0BwIS RETS 2.1-1, Digital Channel Operational Test of 0PR01J
6. 0BwISR 11.A.3-002, Rev 001 Channel Operation Test of Liquid Radwaste Effluent Radiation Monitor 0PR01J
7. EP-EAL-0623 Rev. 0, Braidwood Criteria for Choosing Radiological Gaseous Effluents EAL Threshold Values for Waste Gas Decay Tanks

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU1**Initiating Condition:**

Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes.
- Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.

1. Reading on **ANY** of the following effluent monitors **> 2 times alarm setpoint** established by a current radioactive release discharge permit for **≥ 60 minutes**.

- 0PR01J, Liquid Radwaste Effluent Monitor
- 0PR90J, Liquid Radwaste Effluent Monitor
- 0PR02J, Gas Decay Tank Effluent Monitor
- 0PR10J, Station Blowdown Monitor
- 1/2PR01J, Containment Purge Effluent Monitor
- Discharge Permit specified monitor

OR

2. The sum of readings on the Unit 1 and 2 Aux Bldg Vent WRGMs (1/2 RE-R030) **> 4.42 E+05 µCi/sec** for **≥ 60 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

3. Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates **> 2 times ODCM Limit** with a release duration of **≥ 60 minutes**.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU1 (cont)

Basis:

This IC addresses a potential decrease in the level of safety of the plant as indicated by a low-level radiological release that exceeds regulatory commitments for an extended period of time (e.g., an uncontrolled release). It includes any gaseous or liquid radiological release, monitored or un-monitored, including those for which a radioactivity discharge permit is normally prepared.

Nuclear power plants incorporate design features intended to control the release of radioactive effluents to the environment. Further, there are administrative controls established to prevent unintentional releases, and to control and monitor intentional releases. The occurrence of an extended, uncontrolled radioactive release to the environment is indicative of degradation in these features and/or controls.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

Releases should not be prorated or averaged. For example, a release exceeding 4 times release limits for 30 minutes does not meet the EAL.

EAL #1 Basis:

This EAL addresses radioactivity releases that cause effluent radiation monitor readings to exceed 2 times the limit established by a radioactivity discharge permit. This EAL will typically be associated with planned batch releases from non-continuous release pathways (e.g., radwaste, waste gas).

The effluent monitors listed are those normally used for planned discharges. If a discharge is performed using a different flowpath or effluent monitor other than those listed (e.g., a portable or temporary effluent monitor), then the declaration criteria will be based on the monitor specified in the Discharge Permit.

EAL #2 Basis:

This EAL addresses normally occurring continuous radioactivity releases from monitored gaseous effluent pathways.

EAL #3 Basis

This EAL addresses uncontrolled gaseous or liquid releases that are detected by sample analyses or environmental surveys, particularly on unmonitored pathways (e.g., spills of radioactive liquids into storm drains, heat exchanger leakage in river water systems, etc.).

Escalation of the emergency classification level would be via IC RA1.

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RU1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, AU1
2. UFSAR Section 11.5.2.3
3. ODCM Section 12.3 Liquid Effluents
4. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
5. 0BwSR 11.A.3-002, Rev 001 Channel Operation Test of Liquid Radwaste Effluent Radiation Monitor 0PR01J

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RG2**Initiating Condition:**

Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Note: The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for **60 minutes** or longer.

Basis:

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to a prolonged uncover of spent fuel. This condition will lead to fuel damage and a radiological release to the environment.

It is recognized that this IC would likely not be met until well after another General Emergency IC was met; however, it is included to provide classification diversity.

Basis Reference(s):

1. NEI 99-01 Rev 6, AG2

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RS2**Initiating Condition:**

Spent fuel pool level at (site-specific Level 3 description).

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Lowering of spent fuel pool level to (site-specific Level 3 value).

Basis:

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to IMMINENT fuel damage. This condition entails major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

It is recognized that this IC would likely not be met until well after another Site Area Emergency IC was met; however, it is included to provide classification diversity.

Escalation of the emergency classification level would be via IC RG1 or RG2.

Basis Reference(s):

1. NEI 99-01 Rev 6, AS2

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA2**Initiating Condition:**

Significant lowering of water level above, or damage to, irradiated fuel.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. Uncovery of irradiated fuel in the REFUELING PATHWAY.
OR
2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by **ANY** Table R1 Radiation Monitor reading **>1000 mRem/hr**
OR
3. Lowering of spent fuel pool level to (site specific Level 2 value).

Table R1 Fuel Handling Incident Radiation Monitors
<ul style="list-style-type: none">• Fuel Building Fuel Handling Incident Monitor 0RE-AR055• Fuel Building Fuel Handling Incident Monitor 0RE-AR056• Containment Fuel Handling Incident Monitor 1/2RE-AR011• Containment Fuel Handling Incident Monitor 1/2RE-AR012

Basis:

REFUELING PATHWAY: all the cavities, tubes, canals and pools through which irradiated fuel may be moved or stored, but not including the reactor vessel below the flange.

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

CONFINEMENT BOUNDARY: The irradiated fuel dry storage cask barrier(s) between areas containing radioactive substances and the environment.

This IC addresses events that have caused IMMINENT or actual damage to an irradiated fuel assembly. These events present radiological safety challenges to plant personnel and are precursors to a release of radioactivity to the environment. As such, they represent an actual or potential substantial degradation of the level of safety of the plant.

This IC applies to irradiated fuel that is licensed for dry storage up to the point that the loaded storage cask is sealed. Once sealed, damage to a loaded cask causing loss of the CONFINEMENT BOUNDARY is classified in accordance with IC E-HU1.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA2 (cont)

Basis (cont):

EAL #1 Basis:

This EAL escalates from RU2 in that the loss of level, in the affected portion of the REFUELING PATHWAY, is of sufficient magnitude to have resulted in uncover of irradiated fuel. Indications of irradiated fuel uncover may include direct or indirect visual observation (e.g., reports from personnel or camera images), as well as significant changes in water and radiation levels, or other plant parameters. Computational aids may also be used (e.g., a boil-off curve). Classification of an event using this EAL should be based on the totality of available indications, reports and observations.

While an area radiation monitor could detect a rise in a dose rate due to a lowering of water level in some portion of the REFUELING PATHWAY, the reading may not be a reliable indication of whether or not the fuel is actually uncovered. To the degree possible, readings should be considered in combination with other available indications of inventory loss.

A drop in water level above irradiated fuel within the reactor vessel may be classified in accordance Recognition Category C during the Cold Shutdown and Refueling modes.

EAL #2 Basis:

This EAL addresses a release of radioactive material caused by mechanical damage to irradiated fuel. Damaging events may include the dropping, bumping or binding of an assembly, or dropping a heavy load onto an assembly. A rise in readings on radiation monitors should be considered in conjunction with in-plant reports or observations of a potential fuel damaging event (e.g., a fuel handling accident).

EAL #3 Basis:

Spent fuel pool water level at this value is within the lower end of the level range necessary to prevent significant dose consequences from direct gamma radiation to personnel performing operations in the vicinity of the spent fuel pool. This condition reflects a significant loss of spent fuel pool water inventory and thus it is also a precursor to a loss of the ability to adequately cool the irradiated fuel assemblies stored in the pool.

Escalation of the emergency would be based on either Recognition Category R or C ICs.

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RA2 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, AA2
2. UFSAR 11.5.2.2.6, 11.5.2.2.7, 15.7.4, Table 12.3-3
3. Technical Specification Table 3.3-6-1
4. 1/2BwOA REFUEL-1 Fuel Handling Emergency
5. 1/2BwOA REFUEL-2 Refueling Cavity or Spent Fuel Pool Level Loss
6. TRM 3.9.a, Refueling Operations, Decay Time
7. BwAR 1-1-A2, 2-1-A2, CNMT DRAIN LEAK DETECT FLOW HIGH alarm

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU2**Initiating Condition:**

UNPLANNED loss of water level above irradiated fuel.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by **ANY** of the following:
 - Refueling Cavity water level < **23 ft.** above the Reactor Flange (< **423 ft.** indicated level).
 - OR**
 - Spent Fuel Pool water level < **23 ft.** above the fuel (< **422 ft. 9 in.** indicated level).
 - OR**
 - Indication or report of a drop in water level in the REFUELING PATHWAY.
- AND**
- b. UNPLANNED Area Radiation Monitor reading rise on **ANY** radiation monitors in Table R1.

Table R1 - Fuel Handling Incident Radiation Monitors

- | |
|---|
| <ul style="list-style-type: none">• Fuel Building Fuel Handling Incident Monitor 0RE-AR055• Fuel Building Fuel Handling Incident Monitor 0RE-AR056• Containment Fuel Handling Incident Monitor 1/2RE-AR011• Containment Fuel Handling Incident Monitor 1/2RE-AR012 |
|---|

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

REFUELING PATHWAY: all the cavities, tubes, canals and pools through which irradiated fuel may be moved or stored, but not including the reactor vessel below the flange.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU2 (cont)

Basis (cont):

This IC addresses a loss in water level above irradiated fuel sufficient to cause elevated radiation levels. This condition could be a precursor to a more serious event and is also indicative of a minor loss in the ability to control radiation levels within the plant. It is therefore a potential degradation in the level of safety of the plant.

A water level loss will be primarily determined by indications from available level instrumentation. Other sources of level indications may include reports from plant personnel (e.g., from a refueling crew) or video camera observations (if available) or from any other temporarily installed monitoring instrumentation. A significant drop in the water level may also cause a rise in the radiation levels of adjacent areas that can be detected by monitors in those locations.

The effects of planned evolutions should be considered. For example, a refueling bridge area radiation monitor reading may rise due to planned evolutions such as lifting of the reactor vessel head or movement of a fuel assembly. Note that this EAL is applicable only in cases where the elevated reading is due to an UNPLANNED loss of water level.

A drop in water level above irradiated fuel within the reactor vessel may be classified in accordance Recognition Category C during the Cold Shutdown and Refueling modes.

Escalation of the emergency classification level would be via IC RA2.

Basis Reference(s):

1. NEI 99-01 Rev 6, AU2
2. Technical Specifications 3.7.14
3. UFSAR 11.5.2.2.6, 11.5.2.2.7, 15.7.4, Table 12.3-3
4. 1/2BwOA REFUEL-1 Fuel Handling Emergency
5. 1/2BwOA REFUEL-2 Refueling Cavity or Spent Fuel Pool Level Loss
6. 1/2BwOSR 0.1-6 Unit One(Two) Mode 6 Shiftly and Daily Operating Surveillance
7. BwOP RH-8 Filling the Reactor Cavity for Refueling
8. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
9. BwOP RC-4 Reactor Coolant System Drain
10. BwAR 1-6-C3 REFUELING CAVITY LVL HIGH LOW
11. BwAR 1-1-C1 SPENT FUEL PIT LEVEL HIGH LOW

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA3**Initiating Condition:**

Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- If the equipment in the room or area listed in Table R3 was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.

1. Dose rate > **15 mR/hr** in **ANY** of the following Table R2 areas:

Table R2 Areas Requiring Continuous Occupancy	
<ul style="list-style-type: none"> • Main Control Room – 1/2RE-AR010 • Central Alarm Station – (by survey) 	

OR

2. UNPLANNED event results in radiation levels that prohibit or significantly impede access to **ANY** of the following Table R3 plant rooms or areas:

Table R3 Areas with Entry Related Mode Applicability	
Area	Entry Related Mode Applicability
Auxiliary Building*	Mode 4, 5 and 6
*Areas required to establish shutdown cooling	

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

Table R3 Areas with Entry Related Mode Applicability	
Area	Entry Related Mode Applicability
Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6
Auxiliary Building 401' Curved Wall Area Penetration Area	
Auxiliary Building 383' Remote Shutdown Panel Area	
Auxiliary Building 364' CV Pp areas Curved Wall Area	
Auxiliary Building 346' RH pump areas	

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA3 (cont)

Basis: UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses elevated radiation levels in certain plant rooms/areas sufficient to preclude or impede personnel from performing actions necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal plant procedures. As such, it represents an actual or potential substantial degradation of the level of safety of the plant. The Emergency Director should consider the cause of the increased radiation levels and determine if another IC may be applicable.

Assuming all plant equipment is operating as designed, normal operations is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table R3 is a list of plant rooms or areas with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal operating procedures (establish shutdown cooling), where if this action is not completed the plant would not be able to attain and maintain cold shutdown. This Table does not include rooms or areas for which entry is required solely to perform actions of an administrative or record keeping nature (e.g., normal rounds or routine inspections).

Rooms and areas listed in EAL #1 do not need to be included in EAL #2, including the Control Room.

For EAL #2, an Alert declaration is warranted if entry into the affected room/area is, or may be, procedurally required during the plant operating mode in effect and the elevated radiation levels preclude the ability to place shutdown cooling in service. The emergency classification is not contingent upon whether entry is actually necessary at the time of the increased radiation levels. Access should be considered as impeded if extraordinary measures are necessary to facilitate entry of personnel into the affected room/area (e.g., installing temporary shielding beyond that required by procedure, requiring use of non-routine protective equipment, requesting an extension in dose limits beyond normal administrative limits).

An emergency declaration is not warranted if any of the following conditions apply.

- The plant is in an operating mode different than the mode specified for the affected room/area (i.e., entry is not required during the operating mode in effect at the time of the elevated radiation levels). For example, the plant is in Mode 1 when the radiation rise occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.
- The increased radiation levels are a result of a planned activity that includes compensatory measures which address the temporary inaccessibility of a room or area (e.g., radiography, spent filter or resin transfer, etc.).

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RA3 (cont)

Basis (cont):

- The action for which room/area entry is required is of an administrative or record keeping nature (e.g., normal rounds or routine inspections).
- The access control measures are of a conservative or precautionary nature, and would not actually prevent or impede a required action.

Escalation of the emergency classification level would be via Recognition Category R, C or F ICs.

Basis Reference(s):

1. NEI 99-01 Rev 6, AA3
2. UFSAR Chapter 3.02, UFSAR Table 3.2-1

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU3**Initiating Condition:**

Reactor coolant activity greater than Technical Specification allowable limits.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

1. Gross Failed Fuel Monitor 1/2RE-PR006 indicating I-135 concentration > 5 $\mu\text{Ci/cc}$.

OR

2. Sample analysis indicates that:

- a. Dose Equivalent I-131 specific coolant activity > 60.0 $\mu\text{Ci/gm}$.

OR

- b. Dose Equivalent XE-133 specific coolant activity > 603.0 $\mu\text{Ci/gm}$.

Basis:

This IC addresses a reactor coolant activity value that exceeds an allowable limit specified in Technical Specifications. This condition is a precursor to a more significant event and represents a potential degradation of the level of safety of the plant.

Conditions that cause the specified monitor to alarm that are not related to fuel clad degradation should not result in the declaration of an Unusual Event.

This EAL addresses site-specific radiation monitor readings that provide indication of a degradation of fuel clad integrity.

~~An Unusual Event is only warranted when actual fuel clad damage is the cause of the elevated coolant sample activity (as determined by laboratory confirmation). Fuel clad damage should be assumed to be the cause of elevated Reactor Coolant activity unless another cause is known.~~

Escalation of the emergency classification level would be via ICs FA1 or the Recognition Category R ICs.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU3
2. Technical Specifications 3.4.16
3. 1/2BwOA PRI-4, High Reactor Coolant Activity Unit 1/2
4. PWR Letdown Rad Monitor Setpoint Calculation for Degraded Fuel Indication

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FG1

Initiating Condition:

Loss of ANY Two Barriers AND Loss or Potential Loss of the third barrier.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the General Emergency classification level each barrier is weighted equally.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FS1

Initiating Condition:

Loss or Potential Loss of ANY two barriers.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the Site Area Emergency classification level, each barrier is weighted equally.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FA1**Initiating Condition:**

ANY Loss or ANY Potential Loss of either Fuel Clad or RCS.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the Alert classification level, Fuel Cladding and RCS barriers are weighted more heavily than the Containment barrier. Unlike the Containment barrier, loss or potential loss of either the Fuel Cladding or RCS barrier may result in the relocation of radioactive materials or degradation of core cooling capability. Note that the loss or potential loss of Containment barrier in combination with loss or potential loss of either Fuel Cladding or RCS barrier results in declaration of a Site Area Emergency under EAL FS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS**

1. **Core Cooling CSF-Orange Path** conditions exist

Basis:

There is no Loss threshold associated with RCS or SG Tube Leakage.

Potential Loss Threshold #1 Basis:

Core Cooling - ORANGE indicates subcooling has been lost and that some clad damage may occur.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwFR-C.2 Response to Degraded Core Cooling

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC2**Initiating Condition:**

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS1. **Core-Cooling CSF- Red Path** conditions exist.POTENTIAL LOSS2. **Core Cooling CSF-Orange Path** conditions exist.**OR**3. **Heat Sink CSF- Red Path** conditions exist.**Basis:****Loss Threshold #1 Basis**

This reading indicates temperatures within the core are sufficient to cause significant superheating of reactor coolant.

Core Cooling - RED indicates significant superheating and core uncover and is considered to indicate loss of the Fuel Clad Barrier.

Potential Loss Threshold #2 Basis

This reading indicates temperatures within the core are sufficient to allow the onset of heat-induced cladding damage.

Core Cooling - ORANGE indicates subcooling has been lost and that some clad damage may occur.

Potential Loss Threshold #3 Basis

This condition indicates an extreme challenge to the ability to remove RCS heat using the steam generators (i.e., loss of an effective secondary-side heat sink). This condition represents a potential loss of the Fuel Clad Barrier. The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm. In accordance with EOPs, there may be unusual accident conditions during which operators intentionally reduce the heat removal capability of the steam generators by reducing total feed flow to less than 500 gpm; during these conditions, classification using this threshold is not warranted.

Meeting this threshold results in a Site Area Emergency because this threshold is identical to RCS Barrier RC 2 Potential Loss threshold; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION****FC2 (cont)****Basis (cont):**

Meeting this threshold results in a Site Area Emergency because this threshold is identical to RCS Barrier RC 2 Potential Loss threshold; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal may result in fuel heat-up sufficient to damage the cladding and rise RCS pressure to the point where mass will be lost from the system.

Heat Sink - RED when heat sink is required indicates the ultimate heat sink function is under extreme challenge.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwFR-C.1 Response to Inadequate Core Cooling
3. 1/2BwFR-C.2 Response to Degraded Core Cooling
4. 1/2BwST-3 Heat Sink

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC3**Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS1. Containment radiation monitor (AR020(21)) reading $> 1.95\text{E}+03$ R/hr.**OR**2. Coolant activity as sampled $> 300\mu\text{Ci/gm}$ Dose Equivalent I-131**Basis:****Loss Threshold #1 Basis**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that reactor coolant activity equals $300\mu\text{Ci/gm}$ dose equivalent I-131. Reactor coolant activity above this level is greater than that expected for iodine spikes and corresponds to an approximate range of 2% to 5% fuel clad damage. Since this condition indicates that a significant amount of fuel clad damage has occurred, it represents a loss of the Fuel Clad Barrier.

The radiation monitor reading in this threshold is higher than that specified for RCS Barrier RC3 Loss Threshold since it indicates a loss of both the Fuel Clad Barrier and the RCS Barrier. Note that a combination of the two monitor readings appropriately escalates the emergency classification level to a Site Area Emergency.

Loss Threshold #2 Basis

This threshold indicates that RCS radioactivity concentration is greater than $300\mu\text{Ci/gm}$ dose equivalent I-131. Reactor coolant activity above this level is greater than that expected for iodine spikes and corresponds to an approximate range of 2% to 5% fuel clad damage. Since this condition indicates that a significant amount of fuel clad damage has occurred, it represents a loss of the Fuel Clad Barrier.

It is recognized that sample collection and analysis of reactor coolant with highly elevated activity levels could require several hours to complete. Nonetheless, a sample-related threshold is included as a backup to other indications

There is no Potential Loss threshold associated with RCS Activity / Containment Radiation.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. S&L calculation BB-ER-02, Rev 0
3. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC5**Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

1. Any condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.

POTENTIAL LOSS

2. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.

Basis:**Loss Threshold #1 Basis**

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Fuel Clad Barrier is lost.

Potential Loss Threshold #2 Basis

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Fuel Clad Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS

1. Automatic or manual SI actuation is required by **EITHER** of the following:

a. UNISOLABLE RCS leakage

OR

b. Steam Generator tube RUPTURE.

POTENTIAL LOSS

2. The capacity of one charging pump in the normal charging mode is exceeded due to **EITHER** of the following:

a. UNISOLABLE RCS leakage

OR

b. Steam Generator tube RUPTUREleakage.

OR

3. **RCS Integrity CSF- Red Path** conditions exist.

Basis:

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

RUPTURE(D): The condition of a steam generator in which primary-to-secondary leakage is of sufficient magnitude to require a safety injection.

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

Loss Threshold #1 Basis

This threshold is based on an UNISOLABLE RCS leak of sufficient size to require an automatic or manual actuation of the Emergency Core Cooling System (ECCS). This condition clearly represents a loss of the RCS Barrier.

This threshold is applicable to unidentified and pressure boundary leakage, as well as identified leakage. It is also applicable to UNISOLABLE RCS leakage through an

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC1 (cont)**Basis (cont):**

interfacing system. The mass loss may be into any location – inside containment, to the secondary-side (i.e., steam generator tube leakage) or outside of containment. A steam generator with primary-to-secondary leakage of sufficient magnitude to require a safety injection is considered to be RUPTURED. If a RUPTURED steam generator is also FAULTED outside of containment, the declaration escalates to a Site Area Emergency since the Containment Barrier CT1 Loss threshold will also be met.

Potential Loss Threshold #2 Basis

This threshold is based on an UNISOLABLE RCS leak that results in the inability to maintain pressurizer level within specified limits by operation of a normally used charging (makeup) pump, but an ECCS (SI) actuation has not occurred. The threshold is met when an operating procedure, or operating crew supervision, directs that a standby charging (makeup) pump be placed in service to restore and maintain pressurizer level.

This threshold is applicable to unidentified and pressure boundary leakage, as well as identified leakage. It is also applicable to UNISOLABLE RCS leakage through an interfacing system. The mass loss may be into any location – inside containment, to the secondary-side (i.e., steam generator tube leakage) or outside of containment.

If a leaking steam generator is also FAULTED outside of containment, the declaration escalates to a Site Area Emergency since the Containment Barrier CT1 Loss Threshold will also be met.

Potential Loss Threshold #3 Basis

This condition indicates an extreme challenge to the integrity of the RCS pressure boundary due to pressurized thermal shock – a transient that causes rapid RCS cooldown while the RCS is in Mode 3 or higher (i.e., hot and pressurized).

RCS Integrity - RED indicates an extreme challenge to the safety function derived from appropriate instrument readings.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwST-4 Integrity
3. 1/2BwEP-3 Steam Generator Tube Rupture

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC2**Initiating Condition:**

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS****Heat Sink CSF- Red Path** conditions exist.**Basis:**

There is no Loss threshold associated with Inadequate Heat Removal.

Potential Loss Threshold Basis

Heat Sink - RED when heat sink is required indicates the ultimate heat sink function is under extreme challenge.

This condition indicates an extreme challenge to the ability to remove RCS heat using the steam generators (i.e., loss of an effective secondary-side heat sink). This condition represents a potential loss of the RCS Barrier. The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm. In accordance with EOPs, there may be unusual accident conditions during which operators intentionally reduce the heat removal capability of the steam generators by reducing total feed flow to less than 500 gpm; during these conditions, classification using this threshold is not warranted.

Meeting this threshold results in a Site Area Emergency because this threshold is identical to Fuel Clad Barrier FC2 Potential Loss threshold # 3; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal may result in fuel heat-up sufficient to damage the cladding and rise RCS pressure to the point where mass will be lost from the system.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwST-3 Heat Sink

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC3**Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

Containment radiation monitor (AR020(21)) reading > 25 R/hr.

Basis:**Loss Threshold Basis**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that reactor coolant activity equals Technical Specification allowable limits. This value is lower than that specified for Fuel Clad Barrier FC3 Loss Threshold #1 since it indicates a loss of the RCS Barrier only.

There is no Potential Loss threshold associated with RCS Activity / Containment Radiation.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC5

Initiating Condition:

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:

LOSS

1. Any condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.

POTENTIAL LOSS

2. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.

Basis:

Loss Threshold #1 Basis

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the RCS Barrier is lost.

Potential Loss Threshold #2 Basis

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the RCS Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

A leaking or RUPTURED SG is FAULTED outside of containment.

Basis:

RUPTURE(D): The condition of a steam generator in which primary-to-secondary leakage is of sufficient magnitude to require a safety injection.

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

Loss Threshold Basis

This threshold addresses a leaking or RUPTURED Steam Generator (SG) that is also FAULTED outside of containment. The condition of the SG, whether leaking or RUPTURED, is determined in accordance with the thresholds for RCS Barrier RC1 Potential Loss Threshold 2.b and Loss Threshold 1.b, respectively. This condition represents a bypass of the containment barrier.

FAULTED is a defined term within the NEI 99-01 methodology; this determination is not necessarily dependent upon entry into, or diagnostic steps within, an EOP. For example, if the pressure in a steam generator is decreasing uncontrollably [*part of the FAULTED definition*] and the faulted steam generator isolation procedure is not entered because EOP user rules are dictating implementation of another procedure to address a higher priority condition, the steam generator is still considered FAULTED for emergency classification purposes.

The FAULTED criterion establishes an appropriate lower bound on the size of a steam release that may require an emergency classification. Steam releases of this size are readily observable with normal Control Room indications. The lower bound for this aspect of the containment barrier is analogous to the lower bound criteria specified in IC RU3 for the fuel clad barrier (i.e., RCS activity values) and IC MU6 for the RCS barrier (i.e., RCS leak rate values).

This threshold also applies to prolonged steam releases necessitated by operational considerations such as the forced steaming of a leaking or RUPTURED steam generator directly to atmosphere to cooldown the plant, or to drive an auxiliary (emergency) feed water pump. These types of conditions will result in a significant and

RECOGNITION CATEGORY FISSION PRODUCT BARRIER DEGRADATION

CT1 (cont)

Basis (cont):

sustained release of radioactive steam to the environment (and are thus similar to a FAULTED condition). The inability to isolate the steam flow without an adverse effect on plant cooldown meets the intent of a loss of containment.

Steam releases associated with the expected operation of a SG power operated relief valve or safety relief valve do not meet the intent of this threshold. Such releases may occur intermittently for a short period of time following a reactor trip as operators process through emergency operating procedures to bring the plant to a stable condition and prepare to initiate a plant cooldown. Steam releases associated with the unexpected operation of a valve (e.g., a stuck-open safety valve) do meet this threshold.

Following an SG tube leak or rupture, there may be minor radiological releases through a secondary-side system component (e.g., air ejectors, gland seal exhausters, valve packing, etc.). These types of releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category R ICs.

The emergency classification levels resulting from primary-to-secondary leakage, with or without a steam release from the FAULTED SG, are summarized below.

Primary-to-Secondary Leak Rate	Affected SG is FAULTED Outside of Containment?	
	Yes	No
Less than or equal to 25 gpm	No classification	No classification
Greater than 25 gpm	Unusual Event per MU6	Unusual Event per MU6
The capacity of one charging pump in the normal charging mode is exceeded (<i>RCS Barrier Potential Loss</i>)	Site Area Emergency per FS1	Alert per FA1
Requires an automatic or manual SI actuation (<i>RCS Barrier Loss</i>)	Site Area Emergency per FS1	Alert per FA1

There is no Potential Loss threshold associated with RCS or SG Tube Leakage.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwEP-3 Steam Generator Tube Rupture
3. 1/2BwEP-0 Reactor Trip or Safety Injection Unit 1/2

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT2**Initiating Condition:**

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS**

Core-Cooling CSF- Red Path conditions exist **AND** Functional Restoration procedures **not** effective in **< 15 minutes**.

Basis:

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

There is no Loss threshold associated with Inadequate Heat Removal.

Potential Loss Threshold Basis

This condition represents an **IMMINENT** core melt sequence which, if not corrected, could lead to vessel failure and an increased potential for containment failure. For this condition to occur, there must already have been a loss of the RCS Barrier and the Fuel Clad Barrier. If implementation of a procedure(s) to restore adequate core cooling is not effective (successful) within 15 minutes, it is assumed that the event trajectory will likely lead to core melting and a subsequent challenge of the Containment Barrier.

The restoration procedure is considered "effective" if core exit thermocouple readings are decreasing and/or if reactor vessel level is increasing. Whether or not the procedure(s) will be effective should be apparent within 15 minutes. The Emergency Director should escalate the emergency classification level as soon as it is determined that the procedure(s) will not be effective.

Severe accident analyses (e.g., NUREG-1150) have concluded that function restoration procedures can arrest core degradation in a significant fraction of core damage scenarios, and that the likelihood of containment failure is very small in these events. Given this, it is appropriate to provide 15 minutes beyond the required entry point to determine if procedural actions can reverse the core melt sequence.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwFR-C.1 Response to Inadequate Core Cooling
3. 1/2BwST-2 Core Cooling

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT3**Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS**Containment radiation monitor (AR020(21)) reading > **4.40E+03 R/hr.****Basis:**

There is no Loss threshold associated with RCS Activity / Containment Radiation.

Potential Loss Threshold Basis

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that 20% of the fuel cladding has failed. This level of fuel clad failure is well above that used to determine the analogous Fuel Clad Barrier Loss and RCS Barrier Loss thresholds.

NUREG-1228, *Source Estimations During Incident Response to Severe Nuclear Power Plant Accidents*, indicates the fuel clad failure must be greater than approximately 20% in order for there to be a major release of radioactivity requiring offsite protective actions. For this condition to exist, there must already have been a loss of the RCS Barrier and the Fuel Clad Barrier. It is therefore prudent to treat this condition as a potential loss of containment which would then escalate the emergency classification level to a General Emergency.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4**Initiating Condition:**

Containment Integrity or Bypass

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**1. Containment isolation is required and **EITHER** of the following:

- a. **UNPLANNED** lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Directors judgment indicate a loss of containment integrity.

OR

- b. **UNISOLABLE** pathway from containment to the environment exists.

OR

2. Indication of RCS leakage outside of containment

POTENTIAL LOSS3. **Containment CSF Red Path** conditions exist.**OR**4. Hydrogen Concentration in Containment $\geq 5\%$.**OR**5. a. Containment pressure ≥ 20 psig**AND**

- b. Less than one full train of Containment Spray is operating per design for ≥ 15 minutes.

Basis:

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)**Basis (cont):**

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

Loss Threshold #1 Basis

These thresholds address a situation where containment isolation is required and one of two conditions exists as discussed below. Users are reminded that there may be accident and release conditions that simultaneously meet both loss thresholds 1.a and 1.b.

1.a – Containment integrity has been lost, i.e., the actual containment atmospheric leak rate likely exceeds that associated with allowable leakage (or sometimes referred to as design leakage). Following the release of RCS mass into containment, containment pressure will fluctuate based on a variety of factors; a loss of containment integrity condition may (or may not) be accompanied by a noticeable drop in containment pressure. Recognizing the inherent difficulties in determining a containment leak rate during accident conditions, it is expected that the Emergency Director will assess this threshold using judgment, and with due consideration given to current plant conditions, and available operational and radiological data (e.g., containment pressure, readings on radiation monitors outside containment, operating status of containment pressure control equipment, etc.).

Refer to the middle piping run of Figure 3-F-1. Two simplified examples are provided. One is leakage from a penetration and the other is leakage from an in-service system valve. Depending upon radiation monitor locations and sensitivities, the leakage could be detected by any of the four monitors depicted in the figure.

Another example would be a loss or potential loss of the RCS barrier, and the simultaneous occurrence of two FAULTED locations on a steam generator where one fault is located inside containment (e.g., on a steam or feedwater line) and the other outside of containment. In this case, the associated steam line provides a pathway for the containment atmosphere to escape to an area outside the containment.

Following the leakage of RCS mass into containment and a rise in containment pressure, there may be minor radiological releases associated with allowable (design) containment leakage through various penetrations or system components. These releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category R ICs.

1.b - Conditions are such that there is an UNISOLABLE pathway for the migration of radioactive material from the containment atmosphere to the environment. As used here, the term "environment" includes the atmosphere of a room or area, outside the containment, that may, in turn, communicate with the outside-the-plant atmosphere (e.g., through discharge of a ventilation system or atmospheric leakage). Depending upon a variety of factors, this condition may or may not be accompanied by a noticeable drop in containment pressure.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)**Basis (cont):**

Refer to the top piping run of Figure 3-F-1. In this simplified example, the inboard and outboard isolation valves remained open after a containment isolation was required (i.e., containment isolation was not successful). There is now an UNISOLABLE pathway from the containment to the environment.

The existence of a filter is not considered in the threshold assessment. Filters do not remove fission product noble gases. In addition, a filter could become ineffective due to iodine and/or particulate loading beyond design limits (i.e., retention ability has been exceeded) or water saturation from steam/high humidity in the release stream.

Leakage between two interfacing liquid systems, by itself, does not meet this threshold. Refer to the bottom piping run of Figure 3-F-1. In this simplified example, leakage in an RCP seal cooler is allowing radioactive material to enter the Auxiliary Building. The radioactivity would be detected by the Process Monitor. If there is no leakage from the closed water cooling system to the Auxiliary Building, then no threshold has been met. If the pump or system piping developed a leak that allowed steam/water to enter the Auxiliary Building, then loss threshold 2 would be met. Depending upon radiation monitor locations and sensitivities, this leakage could be detected by any of the four monitors depicted in the figure and cause threshold 1.a to be met as well.

Following the leakage of RCS mass into containment and a rise in containment pressure, there may be minor radiological releases associated with allowable (design) containment leakage through various penetrations or system components. Minor releases may also occur if a containment isolation valve(s) fails to close but the containment atmosphere escapes to a closed system. These releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category R ICs.

The status of the containment barrier during an event involving steam generator tube leakage is assessed using Containment Barrier CT1Loss Threshold.

Loss Threshold #2 Basis

Containment sump, temperature, pressure and/or radiation levels will rise if reactor coolant mass is leaking into the containment. If these parameters have not increased, then the reactor coolant mass may be leaking outside of containment (i.e., a containment bypass sequence). Rises in sump, temperature, pressure, flow and/or radiation level readings outside of the containment may indicate that the RCS mass is being lost outside of containment.

Unexpected elevated readings and alarms on radiation monitors with detectors outside containment should be corroborated with other available indications to confirm that the source is a loss of RCS mass outside of containment. If the fuel clad barrier has not been lost, radiation monitor readings outside of containment may not rise significantly; however, other unexpected changes in sump levels, area temperatures or pressures, flow rates, etc. should be sufficient to determine if RCS mass is being lost outside of the containment.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)

Basis (cont):

Refer to the middle piping run of Figure 3-F-1. In this simplified example, a leak has occurred at a reducer on a pipe carrying reactor coolant in the Auxiliary Building. Depending upon radiation monitor locations and sensitivities, the leakage could be detected by any of the four monitors depicted in the figure and cause loss threshold 1.a to be met as well.

To ensure proper escalation of the emergency classification, the RCS leakage outside of containment must be related to the mass loss that is causing the RCS Barrier RC1 Loss Threshold 1.a and/or Potential Loss threshold 2.a to be met.

Potential Loss Threshold #3 Basis

Containment CSF RED path indicates an extreme challenge to the safety function derived from appropriate instrument readings and/or sampling results, and thus represents a potential loss of containment.

If containment pressure exceeds the design pressure, there exists a potential to lose the Containment Barrier. To reach this level, there must be an inadequate core cooling condition for an extended period of time; therefore, the RCS and Fuel Clad barriers would already be lost. Thus, this threshold is a discriminator between a Site Area Emergency and General Emergency since there is now a potential to lose the third barrier.

Potential Loss Threshold #4 Basis

The existence of an explosive mixture means, at a minimum, that the containment atmospheric hydrogen concentration is sufficient to support a hydrogen burn (i.e., at the lower deflagration limit). A hydrogen burn will raise containment pressure and could result in collateral equipment damage leading to a loss of containment integrity. It therefore represents a potential loss of the Containment Barrier.

Potential Loss Threshold #5 Basis

This threshold describes a condition where containment pressure is greater than the set point at which containment energy (heat) removal systems are designed to automatically actuate, and less than one full train of equipment is capable of operating per design. The 15-minute criterion is included to allow operators time to manually start equipment that may not have automatically started, if possible. This threshold represents a potential loss of containment in that containment heat removal/depressurization systems (e.g., containment sprays, ice condenser fans, etc., but not including containment venting strategies) are either lost or performing in a degraded manner.

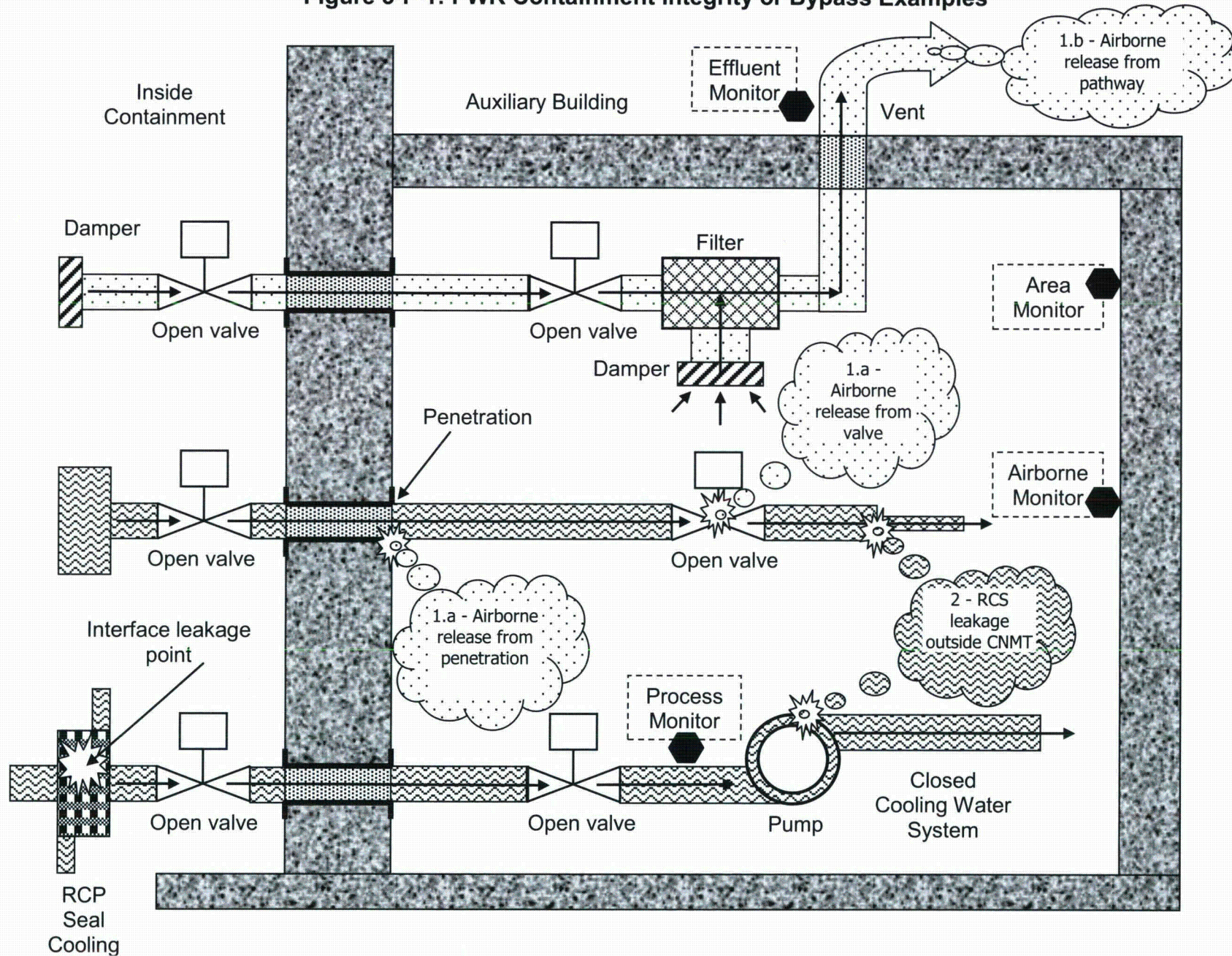
**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. UFSAR Section 15.6.5.2.1
3. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
4. Technical Specifications B 3.6.6, Containment Spray and Cooling Systems
5. 1/2BwST-5 Containment
6. 1/2BwFR-Z.1 Response to High Containment Pressure

RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION
Figure 3-F-1: PWR Containment Integrity or Bypass Examples



**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT5**Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

1. Any condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.

POTENTIAL LOSS

2. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.

Basis:**Loss Threshold #1 Basis**

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Containment Barrier is lost.

Potential Loss Threshold #2 Basis

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Containment Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG1****Initiating Condition:**

Prolonged loss of all offsite and all onsite AC power to emergency buses.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. Loss of **ALL** offsite AC power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. **EITHER** of the following:

a. Restoration of at least one unit ESF bus in **< 4 hours** is not likely.

OR

b. **Core Cooling CSF – Red Path** conditions exist.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a prolonged loss of all power sources to AC emergency buses. A loss of all AC power compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. A prolonged loss of these buses will lead to a loss of any fission product barriers. In addition, fission product barrier monitoring capabilities may be degraded under these conditions.

The EAL should require declaration of a General Emergency prior to meeting the thresholds for IC FG1. This will allow additional time for implementation of offsite protective actions.

Escalation of the emergency classification from Site Area Emergency will occur if it is projected that power cannot be restored to at least one AC emergency bus by the end of the analyzed station blackout coping period. Beyond this time, plant responses and

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG1 (cont)****Basis (cont):**

event trajectory are subject to greater uncertainty, and there is an increased likelihood of challenges to multiple fission product barriers.

The estimate for restoring at least one emergency bus should be based on a realistic appraisal of the situation. Mitigation actions with a low probability of success should not be used as a basis for delaying a classification upgrade. The goal is to maximize the time available to prepare for, and implement, protective actions for the public.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

The EAL will also require a General Emergency declaration if the loss of AC power results in parameters that indicate an inability to adequately remove decay heat from the core.

Basis Reference(s):

1. NEI 99-01 Rev 6, SG1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)
13. 1/2BwST-2 Core Cooling
14. 1/2BwFR-C.1 Response to Inadequate Core Cooling
15. 1/2BwFR-C.2 Response to Degraded Core Cooling

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS1****Initiating Condition:**

Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. Loss of **ALL** offsite AC Power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. Failure to restore power to at least one unit ESF bus in **< 15 minutes** from the time of loss of both offsite and onsite AC power

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a total loss of AC power that compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. In addition, fission product barrier monitoring capabilities may be degraded under these conditions. This IC represents a condition that involves actual or likely major failures of plant functions needed for the protection of the public.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via ICs RG1, FG1 or MG1.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS1 (cont)****Basis Reference(s):**

1. NEI 99-01 Rev 6, SS1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA1****Initiating Condition:**

Loss of all but one AC power source to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. AC power capability to unit ESF buses reduced to only one of the following power sources for **≥ 15 minutes**.

- Affected unit SAT 142-1(242-1)
- Affected unit SAT 142-2(242-2)
- Emergency Diesel Generator DG 1A(2A)
- Emergency Diesel Generator DG 1B(2B)
- Unit crosstie breakers

AND

2. Any additional single power source failure will result in a loss of **ALL** AC power to SAFETY SYSTEMS.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC describes a significant degradation of offsite and onsite AC power sources such that any additional single failure would result in a loss of all AC power to SAFETY SYSTEMS. In this condition, the sole AC power source may be powering one, or more than one, train of safety-related equipment. This IC provides an escalation path from IC MU1.

An "AC power source" is a source recognized in AOPs and EOPs, and capable of supplying required power to an emergency bus. Some examples of this condition are presented below.

- A loss of all offsite power with a concurrent failure of all but one emergency power source (e.g., an onsite diesel generator).

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA1 (cont)****Basis (cont):**

- A loss of all offsite power and loss of all emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from the unit main generator.
- A loss of emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from an offsite power source.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of power.

Escalation of the emergency classification level would be via IC MS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU1****Initiating Condition:**

Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Loss of **ALL** offsite AC power capability to unit ESF buses for \geq 15 minutes.

Basis:

This IC addresses a prolonged loss of offsite power. The loss of offsite power sources renders the plant more vulnerable to a complete loss of power to AC emergency buses. This condition represents a potential reduction in the level of safety of the plant.

For emergency classification purposes, "capability" means that an offsite AC power source(s) is available to the emergency buses, whether or not the buses are powered from it. (e.g. unit cross-tie breakers)

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of offsite power.

Escalation of the emergency classification level would be via IC MA1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG2****Initiating Condition:**

Loss of all AC and Vital DC power sources for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. Loss of **ALL** offsite AC power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. Voltage is **< 108 VDC** on unit 125 VDC battery buses 111(211) and 112(212)

AND

4. **ALL** AC and Vital DC power sources have been lost for **≥ 15 minutes**.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a concurrent and prolonged loss of both AC and Vital DC power. A loss of all AC power compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. A loss of Vital DC power compromises the ability to monitor and control SAFETY SYSTEMS. A sustained loss of both AC and DC power will lead to multiple challenges to fission product barriers.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses. The 15-minute emergency declaration clock begins at the point when all EAL conditions are met.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG2 (cont)****Basis Reference(s):**

1. NEI 99-01 Rev 6, SG8
2. UFSAR 8.3.2.1.1
3. 20E-0-4001 Station One Line Diagram
4. BwAR 1/2-21-E10, 125V DC PNL 111/113(211/213) VOLT LOW
5. 1/2BwOA ELEC 1 Loss of DC Bus UNIT 1/2
6. BwAR 1/2-22-E10, 125V DC PNL 112/114 (212/214) VOLT LOW
7. UFSAR 8.3.1
8. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
9. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
10. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
11. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
12. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
13. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
14. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
15. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
16. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)
17. 1/2BwST-2 Core Cooling
18. 1/2BwFR-C.1 Response to Inadequate Core Cooling
19. 1/2BwFR-C.2 Response to Degraded Core Cooling

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS2****Initiating Condition:**

Loss of all vital DC power for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Voltage is **< 108 VDC** on unit 125 VDC battery buses 111(211) and 112(212) for **≥15 minutes**.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a loss of Vital DC power which compromises the ability to monitor and control SAFETY SYSTEMS. In modes above Cold Shutdown, this condition involves a major failure of plant functions needed for the protection of the public.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via ICs RG1, FG1 or MG3.

Basis Reference(s):

1. NEI 99-01 Rev 6, SS8
2. UFSAR 8.3.2.1.1
3. 20E-0-4001 Station One Line Diagram
4. BwAR 1/2-21-E10, 125V DC PNL 111/113(211/213) VOLT LOW
5. 1/2BwOA ELEC 1 Loss of DC Bus UNIT 1/2
6. BwAR 1/2-22-E10, 125V DC PNL 112/114 (212/214) VOLT LOW

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS3****Initiating Condition:**

Inability to shutdown the reactor causing a challenge to core cooling or RCS heat removal.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):

1. Automatic or Manual Trip did not shutdown the reactor as indicated by Reactor Power $\geq 5\%$.

AND

2. **ALL** manual actions to shutdown the reactor have been unsuccessful as indicated by Reactor Power $\geq 5\%$.

AND

3. **EITHER** of the following conditions exist:

- a. **Core Cooling CSF-RED Path** conditions exist.

OR

- b. **Heat Sink CSF-RED Path** conditions exist.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, all subsequent operator manual actions, both inside and outside the Control Room including driving in control rods and boron injection, are unsuccessful, and continued power generation is challenging the capability to adequately remove heat from the core and/or the RCS. This condition will lead to fuel damage if additional mitigation actions are unsuccessful and thus warrants the declaration of a Site Area Emergency.

If Core Cooling CSF Red Path or Heat Sink CSF Red Path conditions exist prior to a successful reactor shutdown (i.e. $< 5\%$ reactor power) then entry is required.

The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm. If total feed flow is less than 500 gpm due to procedurally directed operator actions then this condition does not apply.

In some instances, the emergency classification resulting from this IC/EAL may be higher than that resulting from an assessment of the plant responses and symptoms against the Recognition Category F ICs/EALs. This is appropriate in that the Recognition Category F ICs/EALs do not address the additional threat posed by a failure to shutdown the reactor. The inclusion of this IC and EAL ensures the timely declaration of a Site Area Emergency in response to prolonged failure to shutdown the reactor.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS3 (cont)****Basis (cont):**

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Escalation of the emergency classification level would be via IC RG1 or FG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SS5
2. 1/2BwST-1 Subcriticality
3. 1/2BwST-2 Core Cooling
4. 1/2BwST-3 Heat Sink
5. 1/2BwFR-S.1 Response to Nuclear Power Generation/ATWS
6. 1/2BwFR-H.1 Response to Loss of Secondary Heat Sink
7. 1/2BwFR C.1 Response to Inadequate Core Cooling
8. 1/2BwOSR 0.1-1,2,3 Unit One(Two) Modes 1, 2, And 3 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA3****Initiating Condition:**

Automatic or manual trip fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):**Note:**

- A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.

1. Automatic or manual Trip did **not** shutdown the reactor as indicated by Reactor Power $\geq 5\%$.

AND

2. Manual actions taken at the Main Control Board are **not** successful in shutting down the reactor as indicated by Reactor Power $\geq 5\%$.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, and subsequent operator manual actions taken at the reactor control consoles to shutdown the reactor are also unsuccessful. This condition represents an actual or potential substantial degradation of the level of safety of the plant. An emergency declaration is required even if the reactor is subsequently shutdown by an action taken away from the reactor control consoles since this event entails a significant failure of the RPS.

A manual action at the Main Control Board is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core (e.g., initiating a manual reactor trip. This action does not include manually driving in control rods or implementation of boron injection strategies. If this action(s) is unsuccessful, operators would immediately pursue additional manual actions at locations away from the reactor control consoles (e.g., locally opening breakers). Actions taken at back-panels or other locations within the Control Room, or any location outside the Control Room, are not considered to be "at the Main Control Board".

The plant response to the failure of an automatic or manual reactor trip will vary based upon several factors including the reactor power level prior to the event, availability of the condenser, performance of mitigation equipment and actions, other concurrent plant conditions, etc. If the failure to shutdown the reactor is prolonged enough to cause a challenge to the core cooling or RCS heat removal safety functions, the emergency

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA3 (cont)****Basis (cont):**

classification level will escalate to a Site Area Emergency via IC MS3. Depending upon plant responses and symptoms, escalation is also possible via IC FS1. Absent the plant conditions needed to meet either IC MS3 or FS1, an Alert declaration is appropriate for this event.

It is recognized that plant responses or symptoms may also require an Alert declaration in accordance with the Recognition Category F ICs; however, this IC and EAL are included to ensure a timely emergency declaration.

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA5
2. 1/2BwST-1 Subcriticality
3. 1/2BwFR-S.1 Response to Nuclear Power Generation/ATWS
4. 1/2BwOSR 0.1-1,2,3 Unit One(Two) Modes 1, 2, And 3 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU3****Initiating Condition:**

Automatic or manual trip fails to shutdown the reactor.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):**Note:**

- A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.
1. a. Automatic Trip did not shutdown the reactor as indicated by Reactor Power $\geq 5\%$.
AND
b. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor.
OR
 2. a. Manual Trip did not shutdown the reactor as indicated by Reactor Power $\geq 5\%$.
AND
b. **EITHER** of the following:
 1. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor.
OR
 2. Subsequent Automatic Trip is successful in shutting down the reactor.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, and either a subsequent operator manual action taken at the reactor control consoles or an automatic trip is successful in shutting down the reactor. This event is a precursor to a more significant condition and thus represents a potential degradation of the level of safety of the plant.

EAL #1 Basis

Following the failure on an automatic reactor trip, operators will promptly initiate manual actions at the reactor control consoles to shutdown the reactor (e.g., initiate a manual reactor trip). If these manual actions are successful in shutting down the reactor, core heat generation will quickly fall to a level within the capabilities of the plant's decay heat removal systems.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU3 (cont)****Basis (cont):****EAL #2 Basis**

If an initial manual reactor trip is unsuccessful, operators will promptly take manual action at another location(s) on the Main Control Board to shutdown the reactor (e.g., initiate a manual reactor trip using a different switch). Depending upon several factors, the initial or subsequent effort to manually trip the reactor, or a concurrent plant condition, may lead to the generation of an automatic reactor trip signal. If a subsequent manual or automatic trip is successful in shutting down the reactor, core heat generation will quickly fall to a level within the capabilities of the plant's decay heat removal systems.

A manual action at the Main Control Board is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core (e.g., initiating a manual reactor trip). This action does not include manually driving in control rods or implementation of boron injection strategies. Actions taken at back-panels or other locations within the Control Room, or any location outside the Control Room, are not considered to be "at the Main Control Board".

The plant response to the failure of an automatic or manual reactor trip will vary based upon several factors including the reactor power level prior to the event, availability of the condenser, performance of mitigation equipment and actions, other concurrent plant conditions, etc. If subsequent operator manual actions taken at the Main Control Board are also unsuccessful in shutting down the reactor, then the emergency classification level will escalate to an Alert via IC MA3. Depending upon the plant response, escalation is also possible via IC FA1. Absent the plant conditions needed to meet either IC MA3 or FA1, an Unusual Event declaration is appropriate for this event.

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Should a reactor trip signal be generated as a result of plant work (e.g., RPS setpoint testing), the following classification guidance should be applied.

- If the signal generated as a result of plant work causes a plant transient that creates a real condition that should have included an automatic reactor trip and the RPS fails to automatically shutdown the reactor, then this IC and the EALs are applicable, and should be evaluated.
- If the signal generated as a result of plant work does not cause a plant transient but should have generated an RPS trip signal and the trip failure is determined through other means (e.g., assessment of test results), then this IC and the EALs are not applicable and no classification is warranted.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

MU3 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, SU5
2. 1/2BwST-1 Subcriticality
3. 1/2BwFR-S.1 Response to Nuclear Power Generation/ATWS
4. 1/2BwOSR 0.1-1,2,3 Unit One(Two) Modes 1, 2, And 3 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA4****Initiating Condition:**

UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥15 minutes**.

Table M1 – Control Room Parameters
<ul style="list-style-type: none">• Reactor Power• PZR Level• RCS Pressure• In Core/Core Exit Temperature• Narrow Range level in at least one Steam Generator• Steam generator Auxiliary Feed Water Flow

AND

2. **ANY** Table M2 transient in progress.

Table M2 – Significant Transients
<ul style="list-style-type: none">• Automatic Turbine Runback >25% thermal reactor power• Electrical Load Rejection >25% full electrical load• Reactor Trip• Safety Injection Actuation

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA4 (cont)****Basis:**

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses the difficulty associated with monitoring rapidly changing plant conditions during a transient without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. During this condition, the margin to a potential fission product barrier challenge is reduced. It thus represents a potential substantial degradation in the level of safety of the plant.

As used in this EAL, an "inability to monitor" means that values for any of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, computer point, digital and recorder source within the Control Room.

An event involving a loss of plant indications, annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine any of these parameters from within the Control Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for any of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from the indications and recorders on a main control board, the SPDS or the plant computer, the availability of other parameter values may be compromised as well.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation of the emergency classification level would be via ICs FS1 or IC RS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU4****Initiating Condition:**

UNPLANNED loss of Control Room indications for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥ 15 minutes**.

Table M1 – Control Room Parameters
<ul style="list-style-type: none">• Reactor Power• PZR Level• RCS Pressure• In Core/Core Exit Temperature• Narrow Range level in at least one Steam Generator• Steam generator Auxiliary Feed Water Flow

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses the difficulty associated with monitoring normal plant conditions without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. This condition is a precursor to a more significant event and represents a potential degradation in the level of safety of the plant.

As used in this EAL, an “inability to monitor” means that values for any of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, digital and recorder source within the Control Room. An event involving a loss of plant indications,

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU4 (cont)****Basis (cont):**

annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine any of these parameters from within the Control Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for any of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from the indications and records on a main control board, the SPDS or the plant computer, the availability of other parameter values may be compromised as well.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation of the emergency classification level would be via IC MA4.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA5****Initiating Condition:**

Hazardous event affecting a SAFETY SYSTEM required for the current operating mode.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- If it is determined that the conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.

1. The occurrence of **ANY** of the following hazardous events:

- Seismic event (earthquake)
- Internal or external flooding event
- High winds or tornado strike
- FIRE
- EXPLOSION
- Other events with similar hazard characteristics as determined by the Shift Manager

AND

2. **EITHER** of the following:

- a. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.

OR

- b. The event has caused **VISIBLE DAMAGE** to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

Basis:

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

EXPLOSION: A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such events may require a post-event inspection to determine if the attributes of an explosion are present.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA5 (cont)****Basis (cont):**

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

VISIBLE DAMAGE: Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

EAL #2.a addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

EAL #2.b addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, as well as damage to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC FS1 or RS1.

If the EAL conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.

Basis Reference(s):

1. NEI 99-01, Rev 6 SA9

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU6****Initiating Condition:**

RCS leakage for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. RCS unidentified or pressure boundary leakage **> 10 gpm** for **≥ 15 minutes**.

OR

2. RCS identified leakage **>25 gpm** for **≥ 15 minutes**.

OR

3. Leakage from the RCS to a location outside containment **>25 gpm** for **≥ 15 minutes**.

Basis:

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

This IC addresses RCS leakage which may be a precursor to a more significant event. In this case, RCS leakage has been detected and operators, following applicable procedures, have been unable to promptly isolate the leak. This condition is considered to be a potential degradation of the level of safety of the plant.

EAL #1 and EAL #2 Basis

These EALs are focused on a loss of mass from the RCS due to "unidentified leakage", "pressure boundary leakage" or "identified leakage" (as these leakage types are defined in the plant Technical Specifications).

EAL #3 Basis

This EAL addresses a RCS mass loss caused by an UNISOLABLE leak through an interfacing system.

These EALs thus apply to leakage into the containment, a secondary-side system (e.g., steam generator tube leakage) or a location outside of containment.

The leak rate values for each EAL were selected because they are usually observable with normal Control Room indications. Lesser values typically require time-consuming calculations to determine (e.g., a mass balance calculation). EAL #1 uses a lower value that reflects the greater significance of unidentified or pressure boundary leakage.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU6 (cont)****Basis (cont):**

The release of mass from the RCS due to the as-designed/expected operation of a relief valve does not warrant an emergency classification. An emergency classification would be required if a mass loss is caused by a relief valve that is not functioning as designed/expected (e.g., a relief valve sticks open and the line flow cannot be isolated). The 15-minute threshold duration allows sufficient time for prompt operator actions to isolate the leakage, if possible.

Escalation of the emergency classification level would be via ICs of Recognition Category R or F.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU4
2. Technical Specifications 3.4.13 & 3.4.14
3. UFSAR 6.2, 5.24
4. 1/2BwOSR 3.4.13.1 Unit One(Two) Reactor Coolant System Water Inventory Balance Surveillance
5. LCOAR - RCS Leakage Detection Instrumentation – Tech Spec LCO 3.4.15
6. LCOAR – RCS Operational Leakage – Tech Spec LCO 3.4.13
7. 1/2BwOA PRI-1 Excessive Primary Leakage Unit 1/2
8. 1/2BwOSR 0.1-4 Unit One(Two) Modes 4 Shiftly and Daily Operating Surveillance
9. 1/2BwOS RF-1 Unit One(Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
10. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding

RECOGNITION CATEGORY SYSTEM MALFUNCTIONS

MU7

Initiating Condition:

Loss of all On-site or Off-site communications capabilities.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

1. Loss of **ALL** Table M3 **Onsite** communications capability affecting the ability to perform routine operations.

OR

2. Loss of **ALL** Table M3 **Offsite** communication capability affecting the ability to perform offsite notifications.

OR

3. Loss of **ALL** Table M3 **NRC** communication capability affecting the ability to perform NRC notifications.

Table M3 – Communications Capability			
System	Onsite	Offsite	NRC
Radios	X		
Plant page	X		
Plant Telephone System	X		
Commercial Telephones	X	X	X
NARS		X	
ENS		X	X
HPN		X	X
Satellite phones		X	X

Basis:

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points, individuals being sent to offsite locations, etc.).

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU7 (cont)****Basis (cont):****EAL #1 Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

EAL #2 Basis

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MW-114-100-F-01, Nuclear Accident Reporting System (NARS) Form.

EAL #3 Basis

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU6
2. UFSAR 9.5.2
3. EP-MW-124-1001 Facilities Inventories And Equipment Tests

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU8****Initiating Condition:**

Failure to isolate containment or loss of containment pressure control.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

1. a. Failure of containment to isolate when required by an actuation signal.
 AND
 b. **ANY** required penetration remains open **> 15 minutes** of the actuation signal.
 OR
2. a. Containment pressure **≥ 20 psig**.
 AND
 b. Less than one full train of Containment Spray is operating per design for **≥ 15 minutes**.

Basis:

This IC addresses a failure of any containment penetrations to automatically isolate (close) when required by an actuation signal. It also addresses an event that results in high containment pressure with a concurrent failure of containment pressure control systems. Absent challenges to another fission product barrier, either condition represents potential degradation of the level of safety of the plant.

EAL #1 Basis

The containment isolation signal must be generated as the result on an off-normal/accident condition (e.g., a safety injection or high containment pressure); a failure resulting from testing or maintenance does not warrant classification. The determination of containment and penetration status – isolated or not isolated – should be made in accordance with the appropriate criteria contained in the plant AOPs and EOPs. The 15-minute criterion is included to allow operators time to manually isolate the required penetrations, if possible.

EAL #2 Basis

Addresses a condition where containment pressure is greater than the setpoint at which containment energy (heat) removal systems are designed to automatically actuate, and less than one full train of equipment is capable of operating per design. The 15-minute criterion is included to allow operators time to manually start equipment that may not have automatically started, if possible. The inability to start the required equipment indicates that containment heat removal/depressurization systems (e.g., containment sprays or ice condenser fans) are either lost or performing in a degraded manner.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU8 (cont)****Basis (cont):**

This event would escalate to a Site Area Emergency in accordance with IC FS1 if there were a concurrent loss or potential loss of either the Fuel Clad or RCS fission product barriers.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU7
2. 1/2BwST-5 Containment

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA1

Initiating Condition:

Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
-
1. Loss of **ALL** offsite AC power to unit ESF buses.
AND
 2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.
AND
 3. Failure to restore power to at least one unit ESF bus in **< 15 minutes** from the time of loss of both offsite and onsite AC power.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related

This IC addresses a total loss of AC power that compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as a Site Area Emergency because of the increased time available to restore an emergency bus to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition represents an actual or potential substantial degradation of the level of safety of the plant.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via IC CS6 or RS1.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CA1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, CA2
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515,68516)

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU1**Initiating Condition:**

Loss of all but one AC power source to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. AC power capability to unit ESF buses reduced to only one of the following power sources for **≥ 15 minutes**.

- Affected unit SAT 142-1(242-1)
- Affected unit SAT 142-2(242-2)
- Emergency Diesel Generator DG 1A(2A)
- Emergency Diesel Generator DG 1B(2B)
- Unit crosstie breakers

AND

2. Any additional single power source failure will result in a loss of **ALL** AC power to SAFETY SYSTEMS.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC describes a significant degradation of offsite and onsite AC power sources such that any additional single failure would result in a loss of all AC power to SAFETY SYSTEMS. In this condition, the sole AC power source may be powering one, or more than one, train of safety-related equipment.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as an Alert because of the increased time available to restore another power source to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition is considered to be a potential degradation of the level of safety of the plant.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CU1 (cont)

Basis (cont):

An "AC power source" is a source recognized in AOPs and EOPs, and capable of supplying required power to an emergency bus. Some examples of this condition are presented below.

- A loss of all offsite power with a concurrent failure of all but one emergency power source (e.g., an onsite diesel generator).
- A loss of all offsite power and loss of all emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from the unit main generator.
- A loss of emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from an offsite power source.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of power.

The subsequent loss of the remaining single power source would escalate the event to an Alert in accordance with IC CA1.

Basis Reference(s):

1. NEI 99-01 Rev 6 CU2
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA2**Initiating Condition:**

Hazardous event affecting SAFETY SYSTEM required for the current operating mode.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- If it is determined that the conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

1. The occurrence of **ANY** of the following hazardous events:

- Seismic event (earthquake)
- Internal or external flooding event
- High winds or tornado strike
- FIRE
- EXPLOSION
- Other events with similar hazard characteristics as determined by the Shift Manager

AND

2. **EITHER** of the following:

- a. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.

OR

- b. The event has caused **VISIBLE DAMAGE** to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

Basis:

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

EXPLOSION: A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such

RECOGNITION CATEGORY**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

events may require a post-event inspection to determine if the attributes of an explosion are present.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CA2 (cont)

Basis (cont):

VISIBLE DAMAGE: Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

EAL #2.a addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

EAL #2.b addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, or to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC CS6 or RS1.

If the EAL conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

Basis Reference(s):

1. NEI 99-01 Rev 6, CA6

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CU3**Initiating Condition:**

Loss of Vital DC power for 15 minutes or longer.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Voltage is **< 108 VDC** on required unit 125 VDC battery buses 111(211) and 112(212) for **≥ 15 minutes**.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a loss of Vital DC power which compromises the ability to monitor and control operable SAFETY SYSTEMS when the plant is in the cold shutdown or refueling mode. In these modes, the core decay heat load has been significantly reduced, and coolant system temperatures and pressures are lower; these conditions rise the time available to restore a vital DC bus to service. Thus, this condition is considered to be a potential degradation of the level of safety of the plant.

As used in this EAL, "required" means the Vital DC buses necessary to support operation of the in-service, or operable, train or trains of SAFETY SYSTEM equipment. For example, if Train A is out-of-service (inoperable) for scheduled outage maintenance work and Train B is in-service (operable), then a loss of Vital DC power affecting Train B would require the declaration of an Unusual Event. A loss of Vital DC power to Train A would not warrant an emergency classification.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Depending upon the event, escalation of the emergency classification level would be via IC CA6 or CA5, or an IC in Recognition Category R.

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CU3 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, CU4
2. UFSAR 8.3.2.1.1
3. 20E-0-4001 Station One Line Diagram
4. BwAR 1/2-21-E10, 125V DC PNL 111/113(211/213) VOLT LOW
5. 1/2BwOA ELEC 1 Loss of DC Bus UNIT 1/2
6. BwAR 1/2-22-E10, 125V DC PNL 112/114 (212/214) VOLT LOW

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU4

Initiating Condition:

Loss of all onsite or offsite communications capabilities.

Operating Mode Applicability:

5, 6, D

Emergency Action Level (EAL):

1. Loss of **ALL** Table C1 **Onsite** communications capability affecting the ability to perform routine operations.
OR
2. Loss of **ALL** Table C1 **Offsite** communication capability affecting the ability to perform offsite notifications.
OR
3. Loss of **ALL** Table C1 **NRC** communication capability affecting the ability to perform NRC notifications.

Table C1 – Communications Capability			
System	Onsite	Offsite	NRC
Radios	X		
Plant page	X		
Plant Telephone System	X		
Commercial Telephones	X	X	X
NARS		X	
ENS		X	X
HPN		X	X
Satellite phones		X	X

Basis:

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points, individuals being sent to offsite locations, etc.).

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CU4 (cont)

Basis (cont):**EAL #1 Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

EAL #2 Basis

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MW-114-100-F-01, Nuclear Accident Reporting System (NARS) Form.

EAL #3 Basis

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

Basis Reference(s):

1. NEI 99-01 Rev 6, CU5
2. EP-MW-124-1001 Facilities Inventories And Equipment Tests

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA5**Initiating Condition:**

Inability to maintain the plant in cold shutdown.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.

1. UNPLANNED rise in RCS temperature > **200°F** due to loss of decay heat removal for > **Table C2 duration**.

OR

2. UNPLANNED RCS pressure rise > **10 psig** as a result of temperature rise due to loss of decay heat removal. (This EAL does not apply in solid plant conditions.)

Table C2 – RCS Heat-up Duration Thresholds		
RCS Status	Containment Closure Status	Heat-up Duration
Intact	Not Applicable	60 minutes*
OR Reduced Inventory (<397 ft.)	Established	20 minutes*
	Not Established	0 minutes
* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, then EAL #1 is not applicable.		

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA5 (cont)

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, etc.).

This IC addresses conditions involving a loss of decay heat removal capability or an addition of heat to the RCS in excess of that which can currently be removed. Either condition represents an actual or potential substantial degradation of the level of safety of the plant.

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

The RCS Heat-up Duration Thresholds table addresses a rise in RCS temperature when CONTAINMENT CLOSURE is established but the RCS is not intact, or RCS inventory is reduced (e.g., mid-loop operation in PWRs). The 20-minute criterion was included to allow time for operator action to address the temperature rise.

The RCS Heat-up Duration Thresholds table also addresses a rise in RCS temperature with the RCS intact. The status of CONTAINMENT CLOSURE is not crucial in this condition since the intact RCS is providing a high pressure barrier to a fission product release. The 60-minute time frame should allow sufficient time to address the temperature rise without a substantial degradation in plant safety.

Finally, in the case where there is a rise in RCS temperature, the RCS is not intact or is at reduced inventory, and CONTAINMENT CLOSURE is not established, no heat-up duration is allowed (i.e., 0 minutes). This is because 1) the evaporated reactor coolant may be released directly into the Containment atmosphere and subsequently to the environment, and 2) there is reduced reactor coolant inventory above the top of irradiated fuel.

EAL #2 Basis

Provides a pressure-based indication of RCS heat-up.

Escalation of the emergency classification level would be via IC CS6 or RS1.

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CA5 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, CA3
2. Technical Specification Table 1.1-1
3. 1/2BwOP RC-4 Reactor Coolant System Drain
4. 1/2BwGP 100-1 Plant Heatup
5. 1/2BwGP 100-5, Plant Shutdown and Cool Down
6. 1/2BwGP 100-6, Refueling Outage
7. 1/2BwOS XPC-W1 Unit One (Two) Containment Penetration Status Weekly Surveillance
8. 1/2BwOSR 3.4.3.1 Reactor Coolant System Pressure/Temperature Limit Surveillance

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU5**Initiating Condition:**

UNPLANNED rise in RCS temperature

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.
 1. UNPLANNED rise in RCS temperature **> 200°F** ~~due to loss of decay heat removal.~~

OR

2. Loss of the following for **≥15 minutes**.

- **ALL** RCS temperature indications

AND

- **ALL** RCS level indications

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

This IC addresses an UNPLANNED rise in RCS temperature above the Technical Specification cold shutdown temperature limit, or the inability to determine RCS temperature and level, represents a potential degradation of the level of safety of the plant. If the RCS is not intact and CONTAINMENT CLOSURE is not established during this event, the Emergency Director should also refer to IC CA5.

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, etc.).

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CU5 (cont)

Basis (cont):

EAL #1 involves a loss of decay heat removal capability, or an addition of heat to the RCS in excess of that which can currently be removed, such that reactor coolant temperature cannot be maintained below the cold shutdown temperature limit specified in Technical Specifications. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

During an outage, the level in the reactor vessel will normally be maintained above the reactor vessel flange. Refueling evolutions that lower water level below the reactor vessel flange are carefully planned and controlled. A loss of forced decay heat removal at reduced inventory may result in a rapid rise in reactor coolant temperature depending on the time after shutdown.

EAL #2 reflects a condition where there has been a significant loss of instrumentation capability necessary to monitor RCS conditions and operators would be unable to monitor key parameters necessary to assure core decay heat removal. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation to Alert would be via IC CA6 based on an inventory loss or IC CA5 based on exceeding plant configuration-specific time criteria.

Basis Reference(s):

1. NEI 99-01 Rev 6, CU3
2. Technical Specifications Table 1.1-1
3. 1/2BwOSR 0.1-6 Unit One(Two) Mode 6 Shiftly And Daily Operating Surveillance
4. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
5. BwOP RC-4 Reactor Coolant System Drain
6. 1/2BwOSR 3.3.3.1 Unit One(Two) Accident Monitoring Instrumentation Monthly Channel Checks
7. LCOAR - RCS Leakage Detection Instrumentation – Tech Spec LCO 3.4.15
8. LCOAR – RCS Operational Leakage – Tech Spec LCO 3.4.13
9. 1/2BwOSR 3.4.3.1 Reactor Coolant System Pressure/Temperature Limit Surveillance

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CG6**Initiating Condition:**

Loss of reactor vessel/RCS inventory affecting fuel clad integrity with containment challenged.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. a. RVLIS indicates **0% Plenum** for **≥ 30 minutes**.

OR

Reactor Vessel Refueling Level Indicators LT-046 and LT-049 **< 392 ft. el.** for **≥ 30 minutes**.

AND

- b. **ANY** Containment Challenge Indication (Table C4)

OR

2. a. Reactor Vessel level ~~unknown~~ **cannot** be monitored for **≥ 30 minutes**.

AND

3. b. Core uncover is indicated by **ANY** of the following:

- Table C3 indications of a sufficient magnitude to indicate core uncover.

OR

- Erratic Source Range Neutron Monitor indication.

OR

- 1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors **> 3000 mR/hr**.

AND

4. c. Any Containment Challenge Indication (Table C4)

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CG6 (cont)

Emergency Action Level (EAL) (cont):

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

Table C4 – Containment Challenge Indications
<ul style="list-style-type: none">• Hydrogen Concentration in Containment $\geq 5\%$• UNPLANNED rise in containment pressure• CONTAINMENT CLOSURE <u>not</u> established*
* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.

Basis:

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses the inability to restore and maintain reactor vessel level above the top of active fuel with containment challenged. This condition represents 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 Guidelines (PAG) exposure levels offsite for more than the immediate site area.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CG6 (cont)

Basis (cont):

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable.

With CONTAINMENT CLOSURE not established, there is a high potential for a direct and unmonitored release of radioactivity to the environment. If CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute time limit, then declaration of a General Emergency is not required.

The existence of an explosive mixture means, at a minimum, that the containment atmospheric hydrogen concentration is sufficient to support a hydrogen burn (i.e., at the lower deflagration limit). A hydrogen burn will raise containment pressure and could result in collateral equipment damage leading to a loss of containment integrity. It therefore represents a challenge to Containment integrity.

In the early stages of a core uncover event, it is unlikely that hydrogen buildup due to a core uncover could result in an explosive gas mixture in containment. If all installed

hydrogen gas monitors are out-of-service during an event leading to fuel cladding damage, it may not be possible to obtain a containment hydrogen gas concentration reading as ambient conditions within the containment will preclude personnel access.

During periods when installed containment hydrogen gas monitors are out-of-service, operators may use the other listed indications to assess whether or not containment is challenged.

The 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

The inability to monitor reactor vessel/RCS level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CG6 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, CG1
2. 1/2BwOS XPC-W1 Unit One (Two) Containment Penetration Status Weekly Surveillance
3. UFSAR E.17
4. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
5. BwOP RC-4 Reactor Coolant System Drain
6. UFSAR 6.2
7. 1/2BwOSR 0.1-4 Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance
8. 1/2BwOS RF-1 Unit One (Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
9. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
10. 1/2BwGP 100-2 Plant Startup
11. 1/2BwGP 100-6T4 Defueled to Mode 6 Checklist
12. 1/2BwOSR 3.3.3.1 Unit One(Two) Accident Monitoring Instrumentation Monthly Channel Checks
13. 1/2BwFR-C.1, Response to Inadequate Core Cooling Unit 1/2
14. 1/2BwST-5 Containment
15. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
16. UFSAR stat Section 6.2.5.2.1
17. EP-EAL-0501, Estimation Of Radiation Monitor Readings Indicating Core Uncovery During Refueling

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CS6**Initiating Condition:**

Loss of reactor vessel/RCS inventory affecting core decay heat removal capability.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. With CONTAINMENT CLOSURE established **EITHER:**

- RVLIS indicates **0% Plenum**

OR

- Reactor Vessel Refueling Level Indicators LT-046 and LT-049 < **392 ft el.**

OR

2. With CONTAINMENT CLOSURE not established **EITHER:**

- RVLIS \leq **15% Plenum**

OR

- Reactor Vessel Refueling Level Indicators LT-046 and LT-049
< **393 ft. el.**

OR

3. a. Reactor Vessel level cannot be monitored ~~unknown~~ for **\geq 30 minutes.**

AND

b. Core uncover is indicated by **ANY** of the following:

- Table C3 indications of a sufficient magnitude to indicate core uncover.

OR

- Erratic Source Range Neutron Monitor indication.

OR

- 1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors > **3000 mR/hr.**

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CS6 (cont)

Emergency Action Level (EAL) (cont):

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

Basis:

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

The lost inventory may be due to a RCS component failure, a loss of configuration control or prolonged boiling of reactor coolant. These conditions entail major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable.

Outage/shutdown contingency plans typically provide for re-establishing or verifying CONTAINMENT CLOSURE following a loss of heat removal or RCS inventory control functions.

The 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CS6 (cont)

Basis (cont):

The inability to monitor reactor vessel/RCS level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

Escalation of the emergency classification level would be via IC CG6 or RG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, CS1
2. UFSAR E.17
3. UFSAR 6.2
4. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
5. UFSAR stat Section 6.2.5.2.1
6. EP-EAL-0501, Estimation of Radiation Monitor Readings Indicating Core Uncovery During Refueling
7. 1/2BwOSR 0.1-4 Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance
8. 1/2BwOS RF-1 Unit One (Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
9. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
10. 1/2BwOSR 0.1-4, Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance
11. 1/2BwGP 100-2 Plant Startup
12. 1/2BwGP 100-6T4 Defueled to Mode 6 Checklist
13. 1/2BwOSR 3.3.3.1 Unit One (Two) Accident Monitoring Instrumentation Monthly Channel Checks
14. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
15. BwOP RC-4 Reactor Coolant System Drain
16. 1/2BwOS XPC-W1 Unit One (Two) Containment Penetration Status Weekly Surveillance

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA6**Initiating Condition:**

Loss of reactor vessel/RCS inventory.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. a. Loss of RCS / Reactor Vessel inventory as indicated RVLIS < **37% Plenum**.

OR

- b. Loss of RCS / Reactor Vessel inventory as indicated by LT-046 and LT-049 < **393.4 ft. el.**

OR

2. a. RCS / Reactor Vessel level cannot be monitored ~~unknown~~ for **≥ 15 minutes**.

AND

- b. Loss of RCS / Reactor Vessel inventory per Table C3 indications.

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CA6 (cont)

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses conditions that are precursors to a loss of the ability to adequately cool irradiated fuel (i.e., a precursor to a challenge to the fuel clad barrier). This condition represents a potential substantial reduction in the level of plant safety.

A lowering of water level below indicated RVLIS < **37% Plenum** or LT-046 and LT-049 indicating < **393.4 ft. el.** indicates that operator actions have not been successful in restoring and maintaining reactor vessel/RCS water level. The heat-up rate of the coolant will rise as the available water inventory is reduced. A continuing drop in water level will lead to core uncover.

Although related, EAL #1 is concerned with the loss of RCS inventory and not the potential concurrent effects on systems needed for decay heat removal (e.g., loss of a Residual Heat Removal suction point). A rise in RCS temperature caused by a loss of decay heat removal capability is evaluated under IC CA5.

The inability to monitor reactor vessel/RCS level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

The 15-minute duration for the loss of level indication was chosen because it is half of the Threshold duration specified in IC CS6

If the reactor vessel/RCS inventory level continues to lower, then escalation to Site Area Emergency would be via IC CS6.

Basis Reference(s):

1. NEI 99-01 Rev 6, CA1
2. UFSAR 6.2 & E.17
3. 1/2BwOA PRI-10
4. 1/2BwOS RF-1 Unit One (Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
5. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
6. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
7. BwOP RC-4 Reactor Coolant System Drain
8. 1/2BwOSR 0.1-4 Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU6**Initiating Condition:**

UNPLANNED loss of reactor vessel/RCS inventory for 15 minutes or longer.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. UNPLANNED loss of reactor coolant results in the inability to restore and maintain Reactor Vessel / RCS level to **> procedurally established lower limit for ≥ 15 minutes.**

OR

2. a. Reactor Vessel / RCS level cannot be monitored ~~unknown~~.

AND

- b. Loss of RCS / Reactor Vessel inventory per Table C3 indications.

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses the inability to restore and maintain water level to a required minimum level (or the lower limit of a level band), or a loss of the ability to monitor reactor vessel/RCS level concurrent with indications of coolant leakage. Either of these conditions is considered to be a potential degradation of the level of safety of the plant.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU6 (cont)

Basis (cont):

Refueling evolutions that decrease RCS water inventory are carefully planned and controlled. An UNPLANNED event that results in water level decreasing below a procedurally required limit warrants the declaration of an Unusual Event due to the reduced water inventory that is available to keep the core covered.

EAL #1 recognizes that the minimum required reactor vessel/RCS level can change several times during the course of a refueling outage as different plant configurations and system lineups are implemented. This EAL is met if the minimum level, specified for the current plant conditions, cannot be maintained for 15 minutes or longer. The minimum level is typically specified in the applicable operating procedure but may be specified in another controlling document.

The procedurally established lower limit is not an operational band established above the procedural limit to allow for operator action prior to exceeding the procedural limit, but it is the procedurally established lower limit.

The 15-minute threshold duration allows sufficient time for prompt operator actions to restore and maintain the expected water level. This criterion excludes transient conditions causing a brief lowering of water level.

EAL #2 addresses a condition where all means to determine reactor vessel/RCS level have been lost. In this condition, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

Continued loss of RCS inventory may result in escalation to the Alert emergency classification level via either IC CA6 or CA5.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CU6 (cont)

Basis Reference(s):

1. NEI 99-01, Rev. 6 CU1
2. UFSAR 6.2 & E.17
3. 1/2BwOSR 0.1-4 Unit One(Two) Modes 4 Shiftly and Daily Operating Surveillance
4. 1/2BwOS RF-1 Unit One(Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
5. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
6. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
7. BwOP RC-4 Reactor Coolant System Drain
8. UFSAR 5.2
9. 1/2BwOSR 3.4.13.1 Unit One(Two) Reactor Coolant System Water Inventory Balance Surveillance
10. 1/2BwOL 3.4.15 LCOAR - Reactor Coolant System Leakage - Leakage Detection Systems
11. 1/2BwOA PRI-1 Excessive Primary Leakage Unit 1/2
12. 1/2BwOSR 0.1-4 Unit One(Two) Modes 6 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HG1**Initiating Condition:**

HOSTILE ACTION resulting in loss of physical control of the facility.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

AND

2. a. **ANY** Table H1 safety function **cannot** be controlled or maintained.

OR

- b. Damage to spent fuel has occurred or is IMMINENT

Table H1 – Safety Functions

- Reactivity Control (ability to shut down the reactor and keep it shutdown)
- Core Cooling (ability to cool the core)
- RCS Heat Removal (ability to maintain heat sink)

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HG1 (cont)

Basis (cont):

HOSTILE FORCE: Any individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g., pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained.

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

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

Basis Reference(s):

1. NEI 99-01, Rev. 6 HG1
5. Station Security Plan – Appendix C

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HS1**Initiating Condition:**

HOSTILE ACTION within the PROTECTED AREA.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: Any individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI): A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

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

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

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HS1 (cont)

Basis (cont):

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

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

This IC does not apply to a HOSTILE ACTION directed at an ISFSI PROTECTED AREA located outside the plant PROTECTED AREA; such an attack should be assessed using IC HA1. It also does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

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

Basis Reference(s):

1. NEI 99-01 Rev 6, HS1
3. Station Security Plan – Appendix C

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HA1**Initiating Condition:**

HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. A validated notification from NRC of an aircraft attack threat < **30 minutes** from the site.

OR

2. Notification by the Security Force that a HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

OWNER CONTROLLED AREA (OCA): The property associated with the station and owned by the company. Access is normally limited to persons entering for official business.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: Any individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

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

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HA1 (cont)

Basis (cont):

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

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

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

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

EAL #1 addresses the threat from the impact of an aircraft on the plant, and the anticipated arrival time is within 30 minutes. The intent of this EAL is to ensure that threat-related notifications are made in a timely manner so that plant personnel and OROs are in a heightened state of readiness. This EAL is met when the threat-related information has been validated in accordance with 0BWOA Security-1, Security Threat.

EAL #2 is applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA. This includes any action directed against an ISFSI that is located outside the plant PROTECTED AREA.

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

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

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

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HA1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, HA1
2. Station Security Plan – Appendix C

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU1**Initiating Condition:**

Confirmed SECURITY CONDITION or threat.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. Notification of a credible security threat directed at the site as determined per SY-AA-101-132, Security Assessment and Response to Unusual Activities.

OR

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

OR

3. Notification by the Security Force of a SECURITY CONDITION that does not involve a HOSTILE ACTION.

Basis:

SECURITY CONDITION: Any Security Event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A SECURITY CONDITION does not involve a HOSTILE ACTION

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU1 (cont)

Basis (cont):

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

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

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

EAL #1 Basis

Addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with SY-AA-101-132, Security Assessment and Response to Unusual Events..

EAL #2 Basis

Addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with 0BwOA Security-1, Security Threat.

EAL #3 Basis

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

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

Basis Reference(s):

1. NEI 99-01 Rev 6, HU1
2. Station Security Plan – Appendix C
3. NRC Safeguards Advisory 10/6/01
4. Letter from Mr. B. A. Boger (NRC) to Ms. Lynette Hendricks (NEI) dated 2/4/02
5. 0BwOA Security-1, Security Threat
6. SY-AA-101-132, Security Assessment and Response to Unusual Events

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HS2**Initiating Condition:**

Inability to control a key safety function from outside the Control Room.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BwOA PRI-5, Control Room Inaccessibility.

AND

2. Control of **ANY** Table H1 key safety function is **not** reestablished in **< 15 minutes**.

Table H1 – Safety Functions

- | |
|---|
| <ul style="list-style-type: none">• Reactivity Control (ability to shut down the reactor and keep it shutdown)• Core Cooling (ability to cool the core)• RCS Heat Removal (ability to maintain heat sink) |
|---|

Basis:

The time period to establish control of the plant starts when either:

- a. Control of the plant is no longer maintained in the Main Control Room

OR

- b. The last Operator has left the Main Control Room.

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations, and the control of a key safety function cannot be reestablished in a timely manner. The failure to gain control of a key safety function following a transfer of plant control to alternate locations is a precursor to a challenge to any fission product barriers within a relatively short period of time.

The determination of whether or not "control" is established at the remote safe shutdown location(s) is based on Emergency Director judgment. The Emergency Director is expected to make a reasonable, informed judgment within 15 minutes whether or not the operating staff has control of key safety functions from the remote safe shutdown location(s).

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HS2 (cont)

Basis (cont):

Escalation of the emergency classification level would be via IC FG1 or CG6.

Basis Reference(s):

1. NEI 99-01, Rev 6 HS6
2. 1/2BwOA PRI-5, Control Room Inaccessibility

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HA2**Initiating Condition:**

Control Room evacuation resulting in transfer of plant control to alternate locations.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BwOA PRI-5, Control Room Inaccessibility.

Basis:

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations outside the Control Room. The loss of the ability to control the plant from the Control Room is considered to be a potential substantial degradation in the level of plant safety.

Following a Control Room evacuation, control of the plant will be transferred to alternate shutdown locations. The necessity to control a plant shutdown from outside the Control Room, in addition to responding to the event that required the evacuation of the Control Room, will present challenges to plant operators and other on-shift personnel. Activation of the ERO and emergency response facilities will assist in responding to these challenges.

Escalation of the emergency classification level would be via IC HS2.

Basis Reference(s):

1. NEI 99-01, Rev 6 HA6
2. 1/2BwOA PRI-5, Control Room Inaccessibility

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU3

Initiating Condition:

FIRE potentially degrading the level of safety of the plant.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- Escalation of the emergency classification level would be via IC CA2 or MA5

1. A FIRE in **ANY** Table H2 area is **not** extinguished in **< 15-minutes** of **ANY** of the following FIRE detection indications:

- Report from the field (i.e., visual observation)
- Receipt of multiple (more than 1) fire alarms or indications
- Field verification of a single fire alarm

OR

2. a. Receipt of a single fire alarm in **ANY** Table H2 area (i.e., no other indications of a FIRE).

AND

- b. The existence of a FIRE is **not** verified in **< 30 minutes** of alarm receipt.

OR

3. A FIRE within the plant PROTECTED AREA not extinguished in **< 60-minutes** of the initial report, alarm or indication.

OR

4. A FIRE within the plant PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish.

Table H2 – Vital Areas

- | |
|--|
| <ul style="list-style-type: none"> • Containment • Auxiliary Building • Fuel Handling Building • Main Steam Tunnels • RWST's • Condensate Storage Tanks • Lake Screen House |
|--|

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU3 (cont)

Basis:

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

This IC addresses the magnitude and extent of FIRES that may be indicative of a potential degradation of the level of safety of the plant.

EAL #1 Basis

The intent of the 15-minute duration is to size the FIRE and to discriminate against small FIRES that are readily extinguished (e.g., smoldering waste paper basket). In addition to alarms, other indications of a FIRE could be a drop in fire main pressure, automatic activation of a suppression system, etc.

Upon receipt, operators will take prompt actions to confirm the validity of an initial fire alarm, indication, or report. For EAL assessment purposes, the emergency declaration clock starts at the time that the initial alarm, indication, or report was received, and not the time that a subsequent verification action was performed. Similarly, the fire duration clock also starts at the time of receipt of the initial alarms, indication or report.

EAL #2 Basis

This EAL addresses receipt of a single fire alarm, and the existence of a FIRE is not verified (i.e., proved or disproved) within 30-minutes of the alarm. Upon receipt, operators will take prompt actions to confirm the validity of a single fire alarm. For EAL assessment purposes, the 30-minute clock starts at the time that the initial alarm was received, and not the time that a subsequent verification action was performed.

A single fire alarm, absent other indication(s) of a FIRE, may be indicative of equipment failure or a spurious activation, and not an actual FIRE. For this reason, additional time is allowed to verify the validity of the alarm. The 30-minute period is a reasonable amount of time to determine if an actual FIRE exists; however, after that time, and absent information to the contrary, it is assumed that an actual FIRE is in progress.

If an actual FIRE is verified by a report from the field, then EAL #1 is immediately applicable, and the emergency must be declared if the FIRE is not extinguished within 15-minutes of the report. If the alarm is verified to be due to an equipment failure or a spurious activation, and this verification occurs within 30-minutes of the receipt of the alarm, then this EAL is not applicable and no emergency declaration is warranted.

EAL #3 Basis

In addition to a FIRE addressed by EAL #1 or EAL #2, a FIRE within the plant PROTECTED AREA not extinguished within 60-minutes may also potentially degrade the level of plant safety.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU3 (cont)

Basis (cont):**EAL #4 Basis**

If a FIRE within the plant PROTECTED AREA is of sufficient size to require a response by an offsite firefighting agency (e.g., a local town Fire Department), then the level of plant safety is potentially degraded. The dispatch of an offsite firefighting agency to the site requires an emergency declaration only if it is needed to actively support firefighting efforts because the fire is beyond the capability of the Fire Brigade to extinguish. Declaration is not necessary if the agency resources are placed on stand-by, or supporting post-extinguishment recovery or investigation actions.

Basis-Related Requirements from Appendix R

Appendix R to 10 CFR 50, states in part:

Criterion 3 of Appendix A to this part specifies that "Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions."

When considering the effects of fire, those systems associated with achieving and maintaining safe shutdown conditions assume major importance to safety because damage to them can lead to core damage resulting from loss of coolant through boil-off.

Because fire may affect safe shutdown systems and because the loss of function of systems used to mitigate the consequences of design basis accidents under post-fire conditions does not per se impact public safety, the need to limit fire damage to systems required to achieve and maintain safe shutdown conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design basis accidents.

In addition, Appendix R to 10 CFR 50, requires, among other considerations, the use of 1-hour fire barriers for the enclosure of cable and equipment and associated non-safety circuits of one redundant train (G.2.c). As used in EAL #2, the 30-minutes to verify a single alarm is well within this worst-case 1-hour time period.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

ISFSI is not specifically addressed in EAL #3 and #4 since it is within the plant PROTECTED AREA and is therefore covered under EALs #3 and #4.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU4
2. UFSAR Section 3.2
3. Drawing S-01A Composite Site Plan
4. BwAP-1100, Fire Protection Procedures

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU4**Initiating Condition:**

Seismic event greater than OBE levels.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- Escalation of the emergency classification level would be via IC CA2 or MA5
- For emergency classification if EAL 2.b is not able to be confirmed, then the occurrence of a seismic event is confirmed in manner deemed appropriate by the Shift Manager or Emergency Director in **≤ 15 mins** of the event

1. Seismic event **> Operating Basis Earthquake (OBE)** as indicated by seismic check at panel OPA02J.

OR

2. When Seismic Monitoring Equipment is **not** available:

a. Control Room personnel feel an actual or potential seismic event.

AND

b. **ANY** one of the following confirmed in **≤ 15 mins** of the event:

- The earthquake resulted in Modified Mercalli Intensity (MMI) **≥ VI** and occurred **≤ 3.5 miles** of the plant.
- The earthquake was magnitude **≥ 6.0**
- The earthquake was magnitude **≥ 5.0** and occurred **≤ 125 miles** of the plant.

~~Seismic event **> Operating Basis Earthquake (OBE)** as indicated by seismic check at panel OPA02J.~~

Basis:

This IC addresses a seismic event that results in accelerations at the plant site greater than those specified for an Operating Basis Earthquake (OBE)¹. An earthquake greater than an OBE but less than a Safe Shutdown Earthquake (SSE)² should have no significant impact on safety-related systems, structures and components; however,

¹ An OBE is vibratory ground motion for which those features of a nuclear power plant necessary for continued operation without undue risk to the health and safety of the public will remain functional.

² An SSE is vibratory ground motion for which certain (generally, safety-related) structures, systems, and components must be designed to remain functional.

RECOGNITION CATEGORY**HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

some time may be required for the plant staff to ascertain the actual post-event condition of the plant (e.g., performs walk-downs and post-event inspections). Given the time necessary to perform walk-downs and inspections, and fully understand any impacts, this event represents a potential degradation of the level of safety of the plant.

Event verification with external sources should not be necessary during or following an OBE. Earthquakes of this magnitude should be readily felt by on-site personnel and recognized as a seismic event (e.g., typical lateral accelerations are in excess of 0.08g). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., a call to the USGS, check internet news sources, etc.); however, the verification action must not preclude a timely emergency declaration.

EAL #2.b and the accompanying note is included to ensure that a declaration does not result from felt vibrations caused by a non-seismic source (e.g., a dropped load). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., call to USGS, check internet source, etc.) however, the verification action must not preclude a timely emergency declaration. This guidance recognizes that it may cause the site to declare an Unusual Event while another site, similarly affected but with readily available OBE indications in the Control Room, may not.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU2
2. 0BwOA ENV-4 Earthquake
3. Annunciator 0-38-E5 Accelograph Accel High

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HA5

Initiating Condition:

Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.

1. Release of a toxic, corrosive, asphyxiant or flammable gas in **ANY** Table H3 area.

Table H3 Areas with Entry Related Mode Applicability	
Area	Entry Related Mode Applicability
Auxiliary Building*	Mode 4, 5, and 6
*Areas required to establish shutdown cooling	

Table H3 Areas with Entry Related Mode Applicability	
Area	Entry Related Mode Applicability
Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6
Auxiliary Building 401' Curved Wall Area Penetration Area	
Auxiliary Building 383' Remote Shutdown Panel Area	
Auxiliary Building 364' CV Pp areas Curved Wall Area	
Auxiliary Building 346' RH pump areas	

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

AND

2. Entry into the room or area is prohibited or impeded.

Basis:

This IC addresses an event involving a release of a hazardous gas that precludes or impedes access to equipment necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal plant procedures. This condition represents an actual or potential substantial degradation of the level of safety of the plant.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HA5 (cont)

Basis (cont):

Assuming all plant equipment is operating as designed, normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table H3 is a list of plant rooms or areas with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal operating procedures (establish shutdown cooling), where if this action is not completed the plant would not be able to attain and maintain cold shutdown. This Table does not include rooms or areas for which entry is required solely to perform actions of an administrative or record keeping nature (e.g., normal rounds or routine inspections).

This Table does not include the Control Room since adequate engineered safety/design features are in place to preclude a Control Room evacuation due to the release of a hazardous gas.

An Alert declaration is warranted if entry into the affected room/area is, or may be, procedurally required during the plant operating mode in effect and the gaseous release preclude the ability to place shutdown cooling in service. The emergency classification is not contingent upon whether entry is actually necessary at the time of the release.

Evaluation of the IC and EAL do not require atmospheric sampling; it only requires the Emergency Director's judgment that the gas concentration in the affected room/area is sufficient to preclude or significantly impede procedurally required access. This judgment may be based on a variety of factors including an existing job hazard analysis, report of ill effects on personnel, advice from a subject matter expert or operating experience with the same or similar hazards. Access should be considered as impeded if extraordinary measures are necessary to facilitate entry of personnel into the affected room/area (e.g., requiring use of protective equipment, such as SCBAs, that is not routinely employed).

An emergency declaration is not warranted if any of the following conditions apply.

- The plant is in an operating mode different than the mode specified for the affected room/area (i.e., entry is not required during the operating mode in effect at the time of the gaseous release). For example, the plant is in Mode 1 when the gaseous release occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.
- The gas release is a planned activity that includes compensatory measures which address the temporary inaccessibility of a room or area (e.g., fire suppression system testing).
- The action for which room/area entry is required is of an administrative or record keeping nature (e.g., normal rounds or routine inspections).
- The access control measures are of a conservative or precautionary nature, and would not actually prevent or impede a required action.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HA5 (cont)

Basis (cont):

An asphyxiant is a gas capable of reducing the level of oxygen in the body to dangerous levels. Most commonly, asphyxiants work by merely displacing air in an enclosed environment. This reduces the concentration of oxygen below the normal level of around 19%, which can lead to breathing difficulties, unconsciousness or even death.

This EAL does not apply to firefighting activities, that generate smoke or that automatically or manually activate a fire suppression system in an area.

The Operating Mode Applicability of this EAL has been revised from All Modes to modes 4, 5, and 6 due to the mode applicability of the areas of concern in Table H-3. In the future should the areas of concern in Table H-3 be revised then the Operating Mode Applicability of this EAL should be reevaluated.

Escalation of the emergency classification level would be via Recognition Category R, C or F ICs.

Basis Reference(s):

1. NEI 99-01, Rev 6 HA5
2. UFSAR Section 3.2
3. ACIT 660892-12, Station Halon Discharge IDLH Evaluation

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU6**Initiating Condition:**

Hazardous Event

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.
- Escalation of the emergency classification level would be via IC CA2 or MA5

1. Tornado strike within the PROTECTED AREA.

OR

2. Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component required by Technical Specifications for the current operating mode.

OR

3. Movement of personnel within the PROTECTED AREA is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release).

OR

4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles.

Basis:

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses hazardous events that are considered to represent a potential degradation of the level of safety of the plant.

EAL #1 Basis

Addresses a tornado striking (touching down) within the Protected Area.

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU6 (cont)

Basis (cont):**EAL #2 Basis**

Addresses flooding of a building room or area that results in operators isolating power to a SAFETY SYSTEM component due to water level or other wetting concerns. Classification is also required if the water level or related wetting causes an automatic isolation of a SAFETY SYSTEM component from its power source (e.g., a breaker or relay trip). To warrant classification, operability of the affected component must be required by Technical Specifications for the current operating mode. ~~Manual isolation of power to a SAFETY SYSTEM component as a result of leakage is an event of lesser impact and would be expected to cause small and localized damage. The consequence of this type of event is adequately assessed and addressed in accordance with Technical Specifications.~~

EAL #3 Basis

Addresses a hazardous materials event originating at an offsite location and of sufficient magnitude to impede the movement of personnel within the PROTECTED AREA.

EAL #4 Basis

Addresses a hazardous event that causes an on-site impediment to vehicle movement and significant enough to prohibit the plant staff from accessing the site using personal vehicles. Examples of such an event include site flooding caused by a hurricane, heavy rains, up-river water releases, dam failure, etc., or an on-site train derailment blocking the access road.

This EAL is not intended to apply to routine impediments such as fog, snow, ice, or vehicle breakdowns or accidents, but rather to more significant conditions such as the Hurricane Andrew strike on Turkey Point in 1992, the flooding around the Cooper Station during the Midwest floods of 1993, or the flooding around Ft. Calhoun Station in 2011.

Escalation of the emergency classification level would be based on ICs in Recognition Categories R, F, M, H or C.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU3

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HG7**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a GENERAL EMERGENCY.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or IMMINENT substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.

Basis:

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a General Emergency.

Basis Reference(s):

1. NEI 99-01, Rev 6 HG7

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY

HS7**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a SITE AREA EMERGENCY.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts, (1) toward site personnel or equipment that could lead to the likely failure of or, (2) that prevent effective access to equipment needed for the 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.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a Site Area Emergency.

Basis Reference(s):

1. NEI 99-01, Rev 6 HS7

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HA7**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an ALERT.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which, in the judgment of the Emergency Director, indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an Alert.

Basis Reference(s):

1. NEI 99-01, Rev 6 HA7

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU7**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an UNUSUAL EVENT.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

Basis:

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an UNUSUAL EVENT.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU7

**RECOGNITION CATEGORY
ISFSI MALFUNCTIONS****E-HU1****Initiating Condition**

Damage to a loaded cask CONFINEMENT BOUNDARY.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading:

- **> 40mr/hr** (gamma + neutron) on the top of the spent fuel cask
OR
- **> 220mr/hr** (gamma + neutron) on the side of the spent fuel cask, excluding inlet and outlet ducts

Basis:

CONFINEMENT BOUNDARY: The irradiated fuel dry storage cask barrier(s) between areas containing radioactive substances and the environment.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) : A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses an event that results in damage to the CONFINEMENT BOUNDARY of a storage cask containing spent fuel. It applies to irradiated fuel that is licensed for dry storage beginning at the point that the loaded storage cask is sealed. The word cask, as used in this EAL, refers to the storage container in use at the site for dry storage of irradiated fuel. The issues of concern are the creation of a potential or actual release path to the environment, degradation of any fuel assemblies due to environmental factors, and configuration changes which could cause challenges in removing the cask or fuel from storage.

The existence of "damage" is determined by radiological survey. The technical specification multiple of "2 times", which is also used in Recognition Category R IC RU1, is used here to distinguish between non-emergency and emergency conditions. The emphasis for this classification is the degradation in the level of safety of the spent fuel cask and not the magnitude of the associated dose or dose rate. It is recognized that in the case of extreme damage to a loaded cask, the fact that the "on-contact" dose rate limit is exceeded may be determined based on measurement of a dose rate at some distance from the cask.

Security-related events for ISFSIs are covered under ICs HU1 and HA1.

Basis Reference(s):

1. NEI 99-01, Rev 6 E-HU1
2. Certificate of Compliance No. 1014 Appendix A Section 5.7

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RG1**Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 1000 mRem TEDE or 5000 mRem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
 - If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
 - Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
 - The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.
1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) **> 3.87 E+09 μ Ci/sec** for **\geq 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).
- OR**
2. Dose assessment Using actual meteorology indicates doses at or beyond the site boundary of **EITHER:**
- a. **> 1000 mRem TEDE**
- OR**
- b. **> 5000 mRem CDE Thyroid**

OR

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RG1 (cont)

Emergency Action Level (EAL) (cont):

3. Field survey results at or beyond the site boundary indicate **EITHER**:

- a. Gamma (closed window) dose rates **>1000 mRem/hr** are expected to continue for **≥ 60 minutes**.

OR

- b. Analyses of field survey samples indicate **> 5000 mRem CDE Thyroid** for **60 minutes** of inhalation.

Basis:

This IC addresses a release of gaseous radioactivity that results in projected or actual offsite doses greater than or equal to the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude will require implementation of protective actions for the public.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at the EPA PAG of 1000 mRem while the 5000 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Basis Reference(s):

1. NEI 99-01 Rev 6, AG1
2. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
3. EP-AA-112-500 Emergency Environmental Monitoring

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RS1**Initiating Condition:**

Release of gaseous radioactivity resulting in offsite dose greater than 100 mRem TEDE or 500 mRem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
- Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
- The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.

1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) **> 3.87 E+08 μ Ci/sec** for **≥ 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of **EITHER:**

a. **> 100 mRem TEDE**

OR

b. **> 500 mRem CDE Thyroid**

OR

3. Field survey results at or beyond the site boundary indicate **EITHER:**

a. Gamma (closed window) dose rates **>100 mR/hr** are expected to continue for **≥ 60 minutes**.

OR

b. Analyses of field survey samples indicate **> 500 mRem CDE Thyroid** for **60 minutes** of inhalation.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RS1 (cont)

Basis:

This IC addresses a release of gaseous radioactivity that results in projected or actual offsite doses greater than or equal to 10% of the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude are associated with the failure of plant systems needed for the protection of the public.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at 10% of the EPA PAG of 1000 mRem while the 500 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Escalation of the emergency classification level would be via IC RG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, AS1
2. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
3. EP-AA-112-500 Emergency Environmental Monitoring

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA1**Initiating Condition:**

Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mRem TEDE or 50 mRem thyroid CDE.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
- Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.
- The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.

1. The sum of readings on the Unit 1 and 2 Aux BLDG Vent WRGMs (1/2 RE-PR030) **> 3.87 E+07 μ Ci/sec** for **≥ 15 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

2. Dose assessment using actual meteorology indicates doses at or beyond the site boundary of **EITHER**:

- a. **> 10 mRem TEDE**

OR

- b. **> 50 mRem CDE Thyroid**

OR

3. Analysis of a liquid effluent sample indicates a concentration or release rate that would result in doses greater than **EITHER** of the following at or beyond the site boundary

- a. **10 mRem TEDE for 60 minutes** of exposure

OR

- b. **50 mRem CDE Thyroid for 60 minutes** of exposure

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA1 (cont)

Emergency Action Level (EAL) (cont):

OR

4. Field survey results at or beyond the site boundary indicate **EITHER**:

- a. Gamma (closed window) dose rates **> 10 mR/hr** are expected to continue for **≥ 60 minutes**.

OR

- b. Analyses of field survey samples indicate **> 50 mRem CDE** Thyroid for **60 minutes** of inhalation.

Basis:

This IC addresses a release of gaseous or liquid radioactivity that results in projected or actual offsite doses greater than or equal to 1% of the EPA Protective Action Guides (PAGs). It includes both monitored and un-monitored releases. Releases of this magnitude represent an actual or potential substantial degradation of the level of safety of the plant as indicated by a radiological release that significantly exceeds regulatory limits (e.g., a significant uncontrolled release).

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at 1% of the EPA PAG of 1000 mRem while the 50 mRem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

This EAL includes any release for which a radioactivity discharge permit was not prepared, or a release that exceeds the conditions (e.g., minimum dilution flow, maximum discharge flow, alarm setpoints, etc.) on the applicable permit.

Escalation of the emergency classification level would be via IC RS1.

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

Basis Reference(s):

1. NEI 99-01 Rev 6, AA1
2. ODCM Section 12.3 Liquid Effluents
3. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
4. EP-EAL-0618 Rev. 0, Braidwood Criteria for Choosing Radiological Liquid Effluents EAL Threshold Values
5. 0BwIS RETS 2.1-1, Digital Channel Operational Test of 0PR01J
6. 0BwISR 11.A.3-002, Rev 001 Channel Operation Test of Liquid Radwaste Effluent Radiation Monitor 0PR01J
7. EP-EAL-0623 Rev. 0, Braidwood Criteria for Choosing Radiological Gaseous Effluents EAL Threshold Values for Waste Gas Decay Tanks

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU1**Initiating Condition:**

Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Notes:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes.
- Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped due to actions to isolate the release path, then the effluent monitor reading is no longer valid for classification purposes.

1. Reading on **ANY** of the following effluent monitors **> 2 times alarm setpoint** established by a current radioactive release discharge permit for **≥ 60 minutes**.

- 0PR01J, Liquid Radwaste Effluent Monitor
- 0PR90J, Liquid Radwaste Effluent Monitor
- 0PR02J, Gas Decay Tank Effluent Monitor
- 0PR10J, Station Blowdown Monitor
- 1/2PR01J, Containment Purge Effluent Monitor
- Discharge Permit specified monitor

OR

2. The sum of readings on the Unit 1 and 2 Aux Bldg Vent WRGMs (1/2 RE-R030) **> 4.42 E+05 $\mu\text{Ci/sec}$** for **≥ 60 minutes** (as determined from Unit 1 & 2 PF430 or PPDS – Total Noble Gas Release Rate).

OR

3. Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates **> 2 times ODCM Limit** with a release duration of **≥ 60 minutes**.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU1 (cont)

Basis:

This IC addresses a potential decrease in the level of safety of the plant as indicated by a low-level radiological release that exceeds regulatory commitments for an extended period of time (e.g., an uncontrolled release). It includes any gaseous or liquid radiological release, monitored or un-monitored, including those for which a radioactivity discharge permit is normally prepared.

Nuclear power plants incorporate design features intended to control the release of radioactive effluents to the environment. Further, there are administrative controls established to prevent unintentional releases, and to control and monitor intentional releases. The occurrence of an extended, uncontrolled radioactive release to the environment is indicative of degradation in these features and/or controls.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

Releases should not be prorated or averaged. For example, a release exceeding 4 times release limits for 30 minutes does not meet the EAL.

EAL #1 Basis:

This EAL addresses radioactivity releases that cause effluent radiation monitor readings to exceed 2 times the limit established by a radioactivity discharge permit. This EAL will typically be associated with planned batch releases from non-continuous release pathways (e.g., radwaste, waste gas).

The effluent monitors listed are those normally used for planned discharges. If a discharge is performed using a different flowpath or effluent monitor other than those listed (e.g., a portable or temporary effluent monitor), then the declaration criteria will be based on the monitor specified in the Discharge Permit.

EAL #2 Basis:

This EAL addresses normally occurring continuous radioactivity releases from monitored gaseous effluent pathways.

EAL #3 Basis

This EAL addresses uncontrolled gaseous or liquid releases that are detected by sample analyses or environmental surveys, particularly on unmonitored pathways (e.g., spills of radioactive liquids into storm drains, heat exchanger leakage in river water systems, etc.).

Escalation of the emergency classification level would be via IC RA1.

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RU1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, AU1
2. UFSAR Section 11.5.2.3
3. ODCM Section 12.3 Liquid Effluents
4. EP-EAL-0601 Revision 1, Criteria for Choosing Radiological Gaseous Effluent EAL Threshold Values Braidwood Station
5. 0BwSR 11.A.3-002, Rev 001 Channel Operation Test of Liquid Radwaste Effluent Radiation Monitor 0PR01J

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RG2**Initiating Condition:**

Spent fuel pool level cannot be restored to at least (site-specific Level 3 description) for 60 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Note: The Emergency Director should declare the General Emergency promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Spent fuel pool level cannot be restored to at least (site-specific Level 3 value) for **60 minutes** or longer.

Basis:

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to a prolonged uncover of spent fuel. This condition will lead to fuel damage and a radiological release to the environment.

It is recognized that this IC would likely not be met until well after another General Emergency IC was met; however, it is included to provide classification diversity.

Basis Reference(s):

1. NEI 99-01 Rev 6, AG2

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RS2**Initiating Condition:**

Spent fuel pool level at (site-specific Level 3 description).

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Lowering of spent fuel pool level to (site-specific Level 3 value).

Basis:

This IC addresses a significant loss of spent fuel pool inventory control and makeup capability leading to IMMINENT fuel damage. This condition entails major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

It is recognized that this IC would likely not be met until well after another Site Area Emergency IC was met; however, it is included to provide classification diversity.

Escalation of the emergency classification level would be via IC RG1 or RG2.

Basis Reference(s):

1. NEI 99-01 Rev 6, AS2

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA2**Initiating Condition:**

Significant lowering of water level above, or damage to, irradiated fuel.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. Uncovery of irradiated fuel in the REFUELING PATHWAY.

OR

2. Damage to irradiated fuel resulting in a release of radioactivity from the fuel as indicated by **ANY** Table R1 Radiation Monitor reading **>1000 mRem/hr**

OR

3. Lowering of spent fuel pool level to (site specific Level 2 value).

Table R1 Fuel Handling Incident Radiation Monitors
<ul style="list-style-type: none">• Fuel Building Fuel Handling Incident Monitor 0RE-AR055• Fuel Building Fuel Handling Incident Monitor 0RE-AR056• Containment Fuel Handling Incident Monitor 1/2RE-AR011• Containment Fuel Handling Incident Monitor 1/2RE-AR012

Basis:

REFUELING PATHWAY: all the cavities, tubes, canals and pools through which irradiated fuel may be moved or stored, but not including the reactor vessel below the flange.

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

CONFINEMENT BOUNDARY: The irradiated fuel dry storage cask barrier(s) between areas containing radioactive substances and the environment.

This IC addresses events that have caused IMMINENT or actual damage to an irradiated fuel assembly. These events present radiological safety challenges to plant personnel and are precursors to a release of radioactivity to the environment. As such, they represent an actual or potential substantial degradation of the level of safety of the plant.

This IC applies to irradiated fuel that is licensed for dry storage up to the point that the loaded storage cask is sealed. Once sealed, damage to a loaded cask causing loss of the CONFINEMENT BOUNDARY is classified in accordance with IC E-HU1.

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RA2 (cont)

Basis (cont):

EAL #1 Basis:

This EAL escalates from RU2 in that the loss of level, in the affected portion of the REFUELING PATHWAY, is of sufficient magnitude to have resulted in uncover of irradiated fuel. Indications of irradiated fuel uncover may include direct or indirect visual observation (e.g., reports from personnel or camera images), as well as significant changes in water and radiation levels, or other plant parameters. Computational aids may also be used (e.g., a boil-off curve). Classification of an event using this EAL should be based on the totality of available indications, reports and observations.

While an area radiation monitor could detect a rise in a dose rate due to a lowering of water level in some portion of the REFUELING PATHWAY, the reading may not be a reliable indication of whether or not the fuel is actually uncovered. To the degree possible, readings should be considered in combination with other available indications of inventory loss.

A drop in water level above irradiated fuel within the reactor vessel may be classified in accordance Recognition Category C during the Cold Shutdown and Refueling modes.

EAL #2 Basis:

This EAL addresses a release of radioactive material caused by mechanical damage to irradiated fuel. Damaging events may include the dropping, bumping or binding of an assembly, or dropping a heavy load onto an assembly. A rise in readings on radiation monitors should be considered in conjunction with in-plant reports or observations of a potential fuel damaging event (e.g., a fuel handling accident).

EAL #3 Basis:

Spent fuel pool water level at this value is within the lower end of the level range necessary to prevent significant dose consequences from direct gamma radiation to personnel performing operations in the vicinity of the spent fuel pool. This condition reflects a significant loss of spent fuel pool water inventory and thus it is also a precursor to a loss of the ability to adequately cool the irradiated fuel assemblies stored in the pool.

Escalation of the emergency would be based on either Recognition Category R or C ICs.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA2 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, AA2
2. UFSAR 11.5.2.2.6, 11.5.2.2.7, 15.7.4, Table 12.3-3
3. Technical Specification Table 3.3-6-1
4. 1/2BwOA REFUEL-1 Fuel Handling Emergency
5. 1/2BwOA REFUEL-2 Refueling Cavity or Spent Fuel Pool Level Loss
6. TRM 3.9.a, Refueling Operations, Decay Time
7. BwAR 1-1-A2, 2-1-A2, CNMT DRAIN LEAK DETECT FLOW HIGH alarm

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU2**Initiating Condition:**

UNPLANNED loss of water level above irradiated fuel.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. a. UNPLANNED water level drop in the REFUELING PATHWAY as indicated by **ANY** of the following:
 - Refueling Cavity water level < 23 ft. above the Reactor Flange (< 423 ft. indicated level).
 - OR**
 - Spent Fuel Pool water level < 23 ft. above the fuel (< 422 ft. 9 in. indicated level).
 - OR**
 - Indication or report of a drop in water level in the REFUELING PATHWAY.
- AND**
- b. UNPLANNED Area Radiation Monitor reading rise on **ANY** radiation monitors in Table R1.

Table R1 - Fuel Handling Incident Radiation Monitors

- | |
|---|
| <ul style="list-style-type: none">• Fuel Building Fuel Handling Incident Monitor 0RE-AR055• Fuel Building Fuel Handling Incident Monitor 0RE-AR056• Containment Fuel Handling Incident Monitor 1/2RE-AR011• Containment Fuel Handling Incident Monitor 1/2RE-AR012 |
|---|

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

REFUELING PATHWAY: all the cavities, tubes, canals and pools through which irradiated fuel may be moved or stored, but not including the reactor vessel below the flange.

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RU2 (cont)

Basis (cont):

This IC addresses a loss in water level above irradiated fuel sufficient to cause elevated radiation levels. This condition could be a precursor to a more serious event and is also indicative of a minor loss in the ability to control radiation levels within the plant. It is therefore a potential degradation in the level of safety of the plant.

A water level loss will be primarily determined by indications from available level instrumentation. Other sources of level indications may include reports from plant personnel (e.g., from a refueling crew) or video camera observations (if available) or from any other temporarily installed monitoring instrumentation. A significant drop in the water level may also cause a rise in the radiation levels of adjacent areas that can be detected by monitors in those locations.

The effects of planned evolutions should be considered. For example, a refueling bridge area radiation monitor reading may rise due to planned evolutions such as lifting of the reactor vessel head or movement of a fuel assembly. Note that this EAL is applicable only in cases where the elevated reading is due to an UNPLANNED loss of water level.

A drop in water level above irradiated fuel within the reactor vessel may be classified in accordance Recognition Category C during the Cold Shutdown and Refueling modes.

Escalation of the emergency classification level would be via IC RA2.

Basis Reference(s):

1. NEI 99-01 Rev 6, AU2
2. Technical Specifications 3.7.14
3. UFSAR 11.5.2.2.6, 11.5.2.2.7, 15.7.4, Table 12.3-3
4. 1/2BwOA REFUEL-1 Fuel Handling Emergency
5. 1/2BwOA REFUEL-2 Refueling Cavity or Spent Fuel Pool Level Loss
6. 1/2BwOSR 0.1-6 Unit One(Two) Mode 6 Shiftly and Daily Operating Surveillance
7. BwOP RH-8 Filling the Reactor Cavity for Refueling
8. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
9. BwOP RC-4 Reactor Coolant System Drain
10. BwAR 1-6-C3 REFUELING CAVITY LVL HIGH LOW
11. BwAR 1-1-C1 SPENT FUEL PIT LEVEL HIGH LOW

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA3**Initiating Condition:**

Radiation levels that impede access to equipment necessary for normal plant operations, cooldown or shutdown.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- If the equipment in the room or area listed in Table R3 was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.

1. Dose rate > **15 mR/hr** in **ANY** of the following Table R2 areas:

Table R2 Areas Requiring Continuous Occupancy
<ul style="list-style-type: none">• Main Control Room – 1/2RE-AR010• Central Alarm Station – (by survey)

OR

2. UNPLANNED event results in radiation levels that prohibit or significantly impede access to **ANY** of the following Table R3 plant rooms or areas:

RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS

RA3 (cont)

Emergency Action Level (EAL) (cont):

Table R3 Areas with Entry Related Mode Applicability	
Area	Entry Related Mode Applicability
Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6
Auxiliary Building 401' Curved Wall Area Penetration Area	
Auxiliary Building 383' Remote Shutdown Panel Area	
Auxiliary Building 364' CV Pp areas Curved Wall Area	
Auxiliary Building 346' RH pump areas	

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses elevated radiation levels in certain plant rooms/areas sufficient to preclude or impede personnel from performing actions necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal plant procedures. As such, it represents an actual or potential substantial degradation of the level of safety of the plant. The Emergency Director should consider the cause of the increased radiation levels and determine if another IC may be applicable.

Assuming all plant equipment is operating as designed, normal operation is capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table R3 is a list of plant rooms or areas with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal operating procedures (establish shutdown cooling), where if this action is not completed the plant would not be able to attain and maintain cold shutdown. This Table does not include rooms or areas for which entry is required solely to perform actions of an administrative or record keeping nature (e.g., normal rounds or routine inspections).

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RA3 (cont)

Basis (cont):

Rooms and areas listed in EAL #1 do not need to be included in EAL #2, including the Control Room.

For EAL #2, an Alert declaration is warranted if entry into the affected room/area is, or may be, procedurally required during the plant operating mode in effect and the elevated radiation levels preclude the ability to place shutdown cooling in service. The emergency classification is not contingent upon whether entry is actually necessary at the time of the increased radiation levels. Access should be considered as impeded if extraordinary measures are necessary to facilitate entry of personnel into the affected room/area (e.g., installing temporary shielding beyond that required by procedure, requiring use of non-routine protective equipment, requesting an extension in dose limits beyond normal administrative limits).

An emergency declaration is not warranted if any of the following conditions apply.

- The plant is in an operating mode different than the mode specified for the affected room/area (i.e., entry is not required during the operating mode in effect at the time of the elevated radiation levels). For example, the plant is in Mode 1 when the radiation rise occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.
- The increased radiation levels are a result of a planned activity that includes compensatory measures which address the temporary inaccessibility of a room or area (e.g., radiography, spent filter or resin transfer, etc.).
- The action for which room/area entry is required is of an administrative or record keeping nature (e.g., normal rounds or routine inspections).
- The access control measures are of a conservative or precautionary nature, and would not actually prevent or impede a required action.

Escalation of the emergency classification level would be via Recognition Category R, C or F ICs.

Basis Reference(s):

1. NEI 99-01 Rev 6, AA3
2. UFSAR Chapter 3.02, UFSAR Table 3.2-1

**RECOGNITION CATEGORY
ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENTS**

RU3**Initiating Condition:**

Reactor coolant activity greater than Technical Specification allowable limits.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

1. Gross Failed Fuel Monitor 1/2RE-PR006 indicating I-135 concentration > 5 $\mu\text{Ci/cc}$.

OR

2. Sample analysis indicates that:

- a. Dose Equivalent I-131 specific coolant activity > 60.0 $\mu\text{Ci/gm}$.

OR

- b. Dose Equivalent XE-133 specific coolant activity > 603.0 $\mu\text{Ci/gm}$.

Basis:

This IC addresses a reactor coolant activity value that exceeds an allowable limit specified in Technical Specifications. This condition is a precursor to a more significant event and represents a potential degradation of the level of safety of the plant.

Conditions that cause the specified monitor to alarm that are not related to fuel clad degradation should not result in the declaration of an Unusual Event.

This EAL addresses site-specific radiation monitor readings that provide indication of a degradation of fuel clad integrity.

Escalation of the emergency classification level would be via ICs FA1 or the Recognition Category R ICs.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU3
2. Technical Specifications 3.4.16
3. 1/2BwOA PRI-4, High Reactor Coolant Activity Unit 1/2
4. PWR Letdown Rad Monitor Setpoint Calculation for Degraded Fuel Indication

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FG1

Initiating Condition:

Loss of ANY Two Barriers AND Loss or Potential Loss of the third barrier.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the General Emergency classification level each barrier is weighted equally.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FS1

Initiating Condition:

Loss or Potential Loss of ANY two barriers.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the Site Area Emergency classification level, each barrier is weighted equally.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FA1**Initiating Condition:**

ANY Loss or ANY Potential Loss of either Fuel Clad or RCS.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

Refer to Fission Product Barrier Loss and Potential Loss threshold values to determine barrier status.

Basis:

Fuel Cladding, RCS and Containment comprise the fission product barriers.

At the Alert classification level, Fuel Cladding and RCS barriers are weighted more heavily than the Containment barrier. Unlike the Containment barrier, loss or potential loss of either the Fuel Cladding or RCS barrier may result in the relocation of radioactive materials or degradation of core cooling capability. Note that the loss or potential loss of Containment barrier in combination with loss or potential loss of either Fuel Cladding or RCS barrier results in declaration of a Site Area Emergency under EAL FS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS**

1. **Core Cooling CSF-Orange Path** conditions exist

Basis:

There is no Loss threshold associated with RCS or SG Tube Leakage.

Potential Loss Threshold #1 Basis:

Core Cooling - ORANGE indicates subcooling has been lost and that some clad damage may occur.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwFR-C.2 Response to Degraded Core Cooling

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC2**Initiating Condition:**

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS1. **Core-Cooling CSF- Red Path** conditions exist.POTENTIAL LOSS2. **Core Cooling CSF-Orange Path** conditions exist.**OR**3. **Heat Sink CSF- Red Path** conditions exist.**Basis:****Loss Threshold #1 Basis**

This reading indicates temperatures within the core are sufficient to cause significant superheating of reactor coolant.

Core Cooling - RED indicates significant superheating and core uncover and is considered to indicate loss of the Fuel Clad Barrier.

Potential Loss Threshold #2 Basis

This reading indicates temperatures within the core are sufficient to allow the onset of heat-induced cladding damage.

Core Cooling - ORANGE indicates subcooling has been lost and that some clad damage may occur.

Potential Loss Threshold #3 Basis

This condition indicates an extreme challenge to the ability to remove RCS heat using the steam generators (i.e., loss of an effective secondary-side heat sink). This condition represents a potential loss of the Fuel Clad Barrier. The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm. In accordance with EOPs, there may be unusual accident conditions during which operators intentionally reduce the heat removal capability of the steam generators by reducing total feed flow to less than 500 gpm; during these conditions, classification using this threshold is not warranted.

Meeting this threshold results in a Site Area Emergency because this threshold is identical to RCS Barrier RC 2 Potential Loss threshold; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION****FC2 (cont)****Basis (cont):**

Meeting this threshold results in a Site Area Emergency because this threshold is identical to RCS Barrier RC 2 Potential Loss threshold; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal may result in fuel heat-up sufficient to damage the cladding and rise RCS pressure to the point where mass will be lost from the system.

Heat Sink - RED when heat sink is required indicates the ultimate heat sink function is under extreme challenge.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwFR-C.1 Response to Inadequate Core Cooling
3. 1/2BwFR-C.2 Response to Degraded Core Cooling
4. 1/2BwST-3 Heat Sink

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC3**Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**1. Containment radiation monitor (AR020(21)) reading > **1.95E+03 R/hr.****OR**2. Coolant activity as sampled > **300 μ Ci/gm** Dose Equivalent I-131**Basis:****Loss Threshold #1 Basis**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that reactor coolant activity equals 300 μ Ci/gm dose equivalent I-131. Reactor coolant activity above this level is greater than that expected for iodine spikes and corresponds to an approximate range of 2% to 5% fuel clad damage. Since this condition indicates that a significant amount of fuel clad damage has occurred, it represents a loss of the Fuel Clad Barrier.

The radiation monitor reading in this threshold is higher than that specified for RCS Barrier RC3 Loss Threshold since it indicates a loss of both the Fuel Clad Barrier and the RCS Barrier. Note that a combination of the two monitor readings appropriately escalates the emergency classification level to a Site Area Emergency.

Loss Threshold #2 Basis

This threshold indicates that RCS radioactivity concentration is greater than 300 μ Ci/gm dose equivalent I-131. Reactor coolant activity above this level is greater than that expected for iodine spikes and corresponds to an approximate range of 2% to 5% fuel clad damage. Since this condition indicates that a significant amount of fuel clad damage has occurred, it represents a loss of the Fuel Clad Barrier.

It is recognized that sample collection and analysis of reactor coolant with highly elevated activity levels could require several hours to complete. Nonetheless, a sample-related threshold is included as a backup to other indications

There is no Potential Loss threshold associated with RCS Activity / Containment Radiation.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. S&L calculation BB-ER-02, Rev 0
3. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

FC5**Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

1. Any condition in the opinion of the Emergency Director that indicates Loss of the Fuel Clad Barrier.

POTENTIAL LOSS

2. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the Fuel Clad Barrier.

Basis:**Loss Threshold #1 Basis**

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Fuel Clad Barrier is lost.

Potential Loss Threshold #2 Basis

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Fuel Clad Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:LOSS

1. Automatic or manual SI actuation is required by **EITHER** of the following:

a. UNISOLABLE RCS leakage

OR

b. Steam Generator tube RUPTURE.

POTENTIAL LOSS

2. The capacity of one charging pump in the normal charging mode is exceeded due to **EITHER** of the following:

a. UNISOLABLE RCS leakage

OR

b. Steam Generator tube leakage.

OR

3. **RCS Integrity CSF- Red Path** conditions exist.

Basis:

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

RUPTURE(D): The condition of a steam generator in which primary-to-secondary leakage is of sufficient magnitude to require a safety injection.

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

Loss Threshold #1 Basis

This threshold is based on an UNISOLABLE RCS leak of sufficient size to require an automatic or manual actuation of the Emergency Core Cooling System (ECCS). This condition clearly represents a loss of the RCS Barrier.

This threshold is applicable to unidentified and pressure boundary leakage, as well as identified leakage. It is also applicable to UNISOLABLE RCS leakage through an

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC1 (cont)**Basis (cont):**

interfacing system. The mass loss may be into any location – inside containment, to the secondary-side (i.e., steam generator tube leakage) or outside of containment. A steam generator with primary-to-secondary leakage of sufficient magnitude to require a safety injection is considered to be RUPTURED. If a RUPTURED steam generator is also FAULTED outside of containment, the declaration escalates to a Site Area Emergency since the Containment Barrier CT1 Loss threshold will also be met.

Potential Loss Threshold #2 Basis

This threshold is based on an UNISOLABLE RCS leak that results in the inability to maintain pressurizer level within specified limits by operation of a normally used charging (makeup) pump, but an ECCS (SI) actuation has not occurred. The threshold is met when an operating procedure, or operating crew supervision, directs that a standby charging (makeup) pump be placed in service to restore and maintain pressurizer level.

This threshold is applicable to unidentified and pressure boundary leakage, as well as identified leakage. It is also applicable to UNISOLABLE RCS leakage through an interfacing system. The mass loss may be into any location – inside containment, to the secondary-side (i.e., steam generator tube leakage) or outside of containment.

If a leaking steam generator is also FAULTED outside of containment, the declaration escalates to a Site Area Emergency since the Containment Barrier CT1 Loss Threshold will also be met.

Potential Loss Threshold #3 Basis

This condition indicates an extreme challenge to the integrity of the RCS pressure boundary due to pressurized thermal shock – a transient that causes rapid RCS cooldown while the RCS is in Mode 3 or higher (i.e., hot and pressurized).

RCS Integrity - RED indicates an extreme challenge to the safety function derived from appropriate instrument readings.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwST-4 Integrity
3. 1/2BwEP-3 Steam Generator Tube Rupture

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC2**Initiating Condition:**

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS****Heat Sink CSF- Red Path** conditions exist.**Basis:**

There is no Loss threshold associated with Inadequate Heat Removal.

Potential Loss Threshold Basis

Heat Sink - RED when heat sink is required indicates the ultimate heat sink function is under extreme challenge.

This condition indicates an extreme challenge to the ability to remove RCS heat using the steam generators (i.e., loss of an effective secondary-side heat sink). This condition represents a potential loss of the RCS Barrier. The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm. In accordance with EOPs, there may be unusual accident conditions during which operators intentionally reduce the heat removal capability of the steam generators by reducing total feed flow to less than 500 gpm; during these conditions, classification using this threshold is not warranted.

Meeting this threshold results in a Site Area Emergency because this threshold is identical to Fuel Clad Barrier FC2 Potential Loss threshold # 3; both will be met. This condition warrants a Site Area Emergency declaration because inadequate RCS heat removal may result in fuel heat-up sufficient to damage the cladding and rise RCS pressure to the point where mass will be lost from the system.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwST-3 Heat Sink

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC3**Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

Containment radiation monitor (AR020(21)) reading > 25 R/hr.

Basis:**Loss Threshold Basis**

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that reactor coolant activity equals Technical Specification allowable limits. This value is lower than that specified for Fuel Clad Barrier FC3 Loss Threshold #1 since it indicates a loss of the RCS Barrier only.

There is no Potential Loss threshold associated with RCS Activity / Containment Radiation.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

RC5**Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

1. Any condition in the opinion of the Emergency Director that indicates Loss of the RCS Barrier.

POTENTIAL LOSS

2. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the RCS Barrier.

Basis:**Loss Threshold #1 Basis**

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the RCS Barrier is lost.

Potential Loss Threshold #2 Basis

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the RCS Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT1**Initiating Condition:**

RCS or SG Tube Leakage

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

A leaking or RUPTURED SG is FAULTED outside of containment.

Basis:

RUPTURE(D): The condition of a steam generator in which primary-to-secondary leakage is of sufficient magnitude to require a safety injection.

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

Loss Threshold Basis

This threshold addresses a leaking or RUPTURED Steam Generator (SG) that is also FAULTED outside of containment. The condition of the SG, whether leaking or RUPTURED, is determined in accordance with the thresholds for RCS Barrier RC1 Potential Loss Threshold 2.b and Loss Threshold 1.b, respectively. This condition represents a bypass of the containment barrier.

FAULTED is a defined term within the NEI 99-01 methodology; this determination is not necessarily dependent upon entry into, or diagnostic steps within, an EOP. For example, if the pressure in a steam generator is decreasing uncontrollably [*part of the FAULTED definition*] and the faulted steam generator isolation procedure is not entered because EOP user rules are dictating implementation of another procedure to address a higher priority condition, the steam generator is still considered FAULTED for emergency classification purposes.

The FAULTED criterion establishes an appropriate lower bound on the size of a steam release that may require an emergency classification. Steam releases of this size are readily observable with normal Control Room indications. The lower bound for this aspect of the containment barrier is analogous to the lower bound criteria specified in IC RU3 for the fuel clad barrier (i.e., RCS activity values) and IC MU6 for the RCS barrier (i.e., RCS leak rate values).

This threshold also applies to prolonged steam releases necessitated by operational considerations such as the forced steaming of a leaking or RUPTURED steam generator directly to atmosphere to cooldown the plant, or to drive an auxiliary (emergency) feed water pump. These types of conditions will result in a significant and

RECOGNITION CATEGORY FISSION PRODUCT BARRIER DEGRADATION

CT1 (cont)

Basis (cont):

sustained release of radioactive steam to the environment (and are thus similar to a FAULTED condition). The inability to isolate the steam flow without an adverse effect on plant cooldown meets the intent of a loss of containment.

Steam releases associated with the expected operation of a SG power operated relief valve or safety relief valve do not meet the intent of this threshold. Such releases may occur intermittently for a short period of time following a reactor trip as operators process through emergency operating procedures to bring the plant to a stable condition and prepare to initiate a plant cooldown. Steam releases associated with the unexpected operation of a valve (e.g., a stuck-open safety valve) do meet this threshold.

Following an SG tube leak or rupture, there may be minor radiological releases through a secondary-side system component (e.g., air ejectors, gland seal exhausters, valve packing, etc.). These types of releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category R ICs.

The emergency classification levels resulting from primary-to-secondary leakage, with or without a steam release from the FAULTED SG, are summarized below.

Primary-to-Secondary Leak Rate	Affected SG is FAULTED Outside of Containment?	
	Yes	No
Less than or equal to 25 gpm	No classification	No classification
Greater than 25 gpm	Unusual Event per MU6	Unusual Event per MU6
The capacity of one charging pump in the normal charging mode is exceeded (<i>RCS Barrier Potential Loss</i>)	Site Area Emergency per FS1	Alert per FA1
Requires an automatic or manual SI actuation (<i>RCS Barrier Loss</i>)	Site Area Emergency per FS1	Alert per FA1

There is no Potential Loss threshold associated with RCS or SG Tube Leakage.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwEP-3 Steam Generator Tube Rupture
3. 1/2BwEP-0 Reactor Trip or Safety Injection Unit 1/2

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT2**Initiating Condition:**

Inadequate Heat Removal

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:POTENTIAL LOSS

Core-Cooling CSF- Red Path conditions exist **AND** Functional Restoration procedures **not** effective in **< 15 minutes**.

Basis:

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

There is no Loss threshold associated with Inadequate Heat Removal.

Potential Loss Threshold Basis

This condition represents an IMMINENT core melt sequence which, if not corrected, could lead to vessel failure and an increased potential for containment failure. For this condition to occur, there must already have been a loss of the RCS Barrier and the Fuel Clad Barrier. If implementation of a procedure(s) to restore adequate core cooling is not effective (successful) within 15 minutes, it is assumed that the event trajectory will likely lead to core melting and a subsequent challenge of the Containment Barrier.

The restoration procedure is considered "effective" if core exit thermocouple readings are decreasing and/or if reactor vessel level is increasing. Whether or not the procedure(s) will be effective should be apparent within 15 minutes. The Emergency Director should escalate the emergency classification level as soon as it is determined that the procedure(s) will not be effective.

Severe accident analyses (e.g., NUREG-1150) have concluded that function restoration procedures can arrest core degradation in a significant fraction of core damage scenarios, and that the likelihood of containment failure is very small in these events. Given this, it is appropriate to provide 15 minutes beyond the required entry point to determine if procedural actions can reverse the core melt sequence.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. 1/2BwFR-C.1 Response to Inadequate Core Cooling
3. 1/2BwST-2 Core Cooling

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT3**Initiating Condition:**

Containment Radiation / RCS Activity

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**POTENTIAL LOSS**Containment radiation monitor (AR020(21)) reading > **4.40E+03 R/hr.****Basis:**

There is no Loss threshold associated with RCS Activity / Containment Radiation.

Potential Loss Threshold Basis

The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that 20% of the fuel cladding has failed. This level of fuel clad failure is well above that used to determine the analogous Fuel Clad Barrier Loss and RCS Barrier Loss thresholds.

NUREG-1228, *Source Estimations During Incident Response to Severe Nuclear Power Plant Accidents*, indicates the fuel clad failure must be greater than approximately 20% in order for there to be a major release of radioactivity requiring offsite protective actions. For this condition to exist, there must already have been a loss of the RCS Barrier and the Fuel Clad Barrier. It is therefore prudent to treat this condition as a potential loss of containment which would then escalate the emergency classification level to a General Emergency.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. Core Damage Assessment Methodology (CDAM)

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4**Initiating Condition:**

Containment Integrity or Bypass

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**1. Containment isolation is required and **EITHER** of the following:

- a. UNPLANNED lowering in containment pressure or rise in radiation monitor readings outside of containment in the Emergency Directors judgment indicate a loss of containment integrity.

OR

- b. UNISOLABLE pathway from containment to the environment exists.

OR

2. Indication of RCS leakage outside of containment

POTENTIAL LOSS3. **Containment CSF Red Path** conditions exist.**OR**4. Hydrogen Concentration in Containment $\geq 5\%$.**OR**5. a. Containment pressure ≥ 20 psig**AND**

- b. Less than one full train of Containment Spray is operating per design for ≥ 15 minutes.

Basis:

FAULTED: The term applied to a steam generator that has a steam leak on the secondary side of sufficient size to cause an uncontrolled drop in steam generator pressure or the steam generator to become completely depressurized.

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)**Basis (cont):****Loss Threshold #1 Basis**

These thresholds address a situation where containment isolation is required and one of two conditions exists as discussed below. Users are reminded that there may be accident and release conditions that simultaneously meet both loss thresholds 1.a and 1.b.

1.a – Containment integrity has been lost, i.e., the actual containment atmospheric leak rate likely exceeds that associated with allowable leakage (or sometimes referred to as design leakage). Following the release of RCS mass into containment, containment pressure will fluctuate based on a variety of factors; a loss of containment integrity condition may (or may not) be accompanied by a noticeable drop in containment pressure. Recognizing the inherent difficulties in determining a containment leak rate during accident conditions, it is expected that the Emergency Director will assess this threshold using judgment, and with due consideration given to current plant conditions, and available operational and radiological data (e.g., containment pressure, readings on radiation monitors outside containment, operating status of containment pressure control equipment, etc.).

Refer to the middle piping run of Figure 3-F-1. Two simplified examples are provided. One is leakage from a penetration and the other is leakage from an in-service system valve. Depending upon radiation monitor locations and sensitivities, the leakage could be detected by any of the four monitors depicted in the figure.

Another example would be a loss or potential loss of the RCS barrier, and the simultaneous occurrence of two FAULTED locations on a steam generator where one fault is located inside containment (e.g., on a steam or feedwater line) and the other outside of containment. In this case, the associated steam line provides a pathway for the containment atmosphere to escape to an area outside the containment.

Following the leakage of RCS mass into containment and a rise in containment pressure, there may be minor radiological releases associated with allowable (design) containment leakage through various penetrations or system components. These releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category R ICs.

1.b - Conditions are such that there is an UNISOLABLE pathway for the migration of radioactive material from the containment atmosphere to the environment. As used here, the term "environment" includes the atmosphere of a room or area, outside the containment, that may, in turn, communicate with the outside-the-plant atmosphere (e.g., through discharge of a ventilation system or atmospheric leakage). Depending upon a variety of factors, this condition may or may not be accompanied by a noticeable drop in containment pressure.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)**Basis (cont):**

Refer to the top piping run of Figure 3-F-1. In this simplified example, the inboard and outboard isolation valves remained open after a containment isolation was required (i.e., containment isolation was not successful). There is now an UNISOLABLE pathway from the containment to the environment.

The existence of a filter is not considered in the threshold assessment. Filters do not remove fission product noble gases. In addition, a filter could become ineffective due to iodine and/or particulate loading beyond design limits (i.e., retention ability has been exceeded) or water saturation from steam/high humidity in the release stream.

Leakage between two interfacing liquid systems, by itself, does not meet this threshold. Refer to the bottom piping run of Figure 3-F-1. In this simplified example, leakage in an RCP seal cooler is allowing radioactive material to enter the Auxiliary Building. The radioactivity would be detected by the Process Monitor. If there is no leakage from the closed water cooling system to the Auxiliary Building, then no threshold has been met. If the pump or system piping developed a leak that allowed steam/water to enter the Auxiliary Building, then loss threshold 2 would be met. Depending upon radiation monitor locations and sensitivities, this leakage could be detected by any of the four monitors depicted in the figure and cause threshold 1.a to be met as well.

Following the leakage of RCS mass into containment and a rise in containment pressure, there may be minor radiological releases associated with allowable (design) containment leakage through various penetrations or system components. Minor releases may also occur if a containment isolation valve(s) fails to close but the containment atmosphere escapes to a closed system. These releases do not constitute a loss or potential loss of containment but should be evaluated using the Recognition Category R ICs.

The status of the containment barrier during an event involving steam generator tube leakage is assessed using Containment Barrier CT1Loss Threshold.

Loss Threshold #2 Basis

Containment sump, temperature, pressure and/or radiation levels will rise if reactor coolant mass is leaking into the containment. If these parameters have not increased, then the reactor coolant mass may be leaking outside of containment (i.e., a containment bypass sequence). Rises in sump, temperature, pressure, flow and/or radiation level readings outside of the containment may indicate that the RCS mass is being lost outside of containment.

Unexpected elevated readings and alarms on radiation monitors with detectors outside containment should be corroborated with other available indications to confirm that the source is a loss of RCS mass outside of containment. If the fuel clad barrier has not been lost, radiation monitor readings outside of containment may not rise significantly; however, other unexpected changes in sump levels, area temperatures or pressures, flow rates, etc. should be sufficient to determine if RCS mass is being lost outside of the containment.

**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)**Basis (cont):**

Refer to the middle piping run of Figure 3-F-1. In this simplified example, a leak has occurred at a reducer on a pipe carrying reactor coolant in the Auxiliary Building. Depending upon radiation monitor locations and sensitivities, the leakage could be detected by any of the four monitors depicted in the figure and cause loss threshold 1.a to be met as well.

To ensure proper escalation of the emergency classification, the RCS leakage outside of containment must be related to the mass loss that is causing the RCS Barrier RC1 Loss Threshold 1.a and/or Potential Loss threshold 2.a to be met.

Potential Loss Threshold #3 Basis

Containment CSF RED path indicates an extreme challenge to the safety function derived from appropriate instrument readings and/or sampling results, and thus represents a potential loss of containment.

If containment pressure exceeds the design pressure, there exists a potential to lose the Containment Barrier. To reach this level, there must be an inadequate core cooling condition for an extended period of time; therefore, the RCS and Fuel Clad barriers would already be lost. Thus, this threshold is a discriminator between a Site Area Emergency and General Emergency since there is now a potential to lose the third barrier.

Potential Loss Threshold #4 Basis

The existence of an explosive mixture means, at a minimum, that the containment atmospheric hydrogen concentration is sufficient to support a hydrogen burn (i.e., at the lower deflagration limit). A hydrogen burn will raise containment pressure and could result in collateral equipment damage leading to a loss of containment integrity. It therefore represents a potential loss of the Containment Barrier.

Potential Loss Threshold #5 Basis

This threshold describes a condition where containment pressure is greater than the set point at which containment energy (heat) removal systems are designed to automatically actuate, and less than one full train of equipment is capable of operating per design. The 15-minute criterion is included to allow operators time to manually start equipment that may not have automatically started, if possible. This threshold represents a potential loss of containment in that containment heat removal/depressurization systems (e.g., containment sprays, ice condenser fans, etc., but not including containment venting strategies) are either lost or performing in a degraded manner.

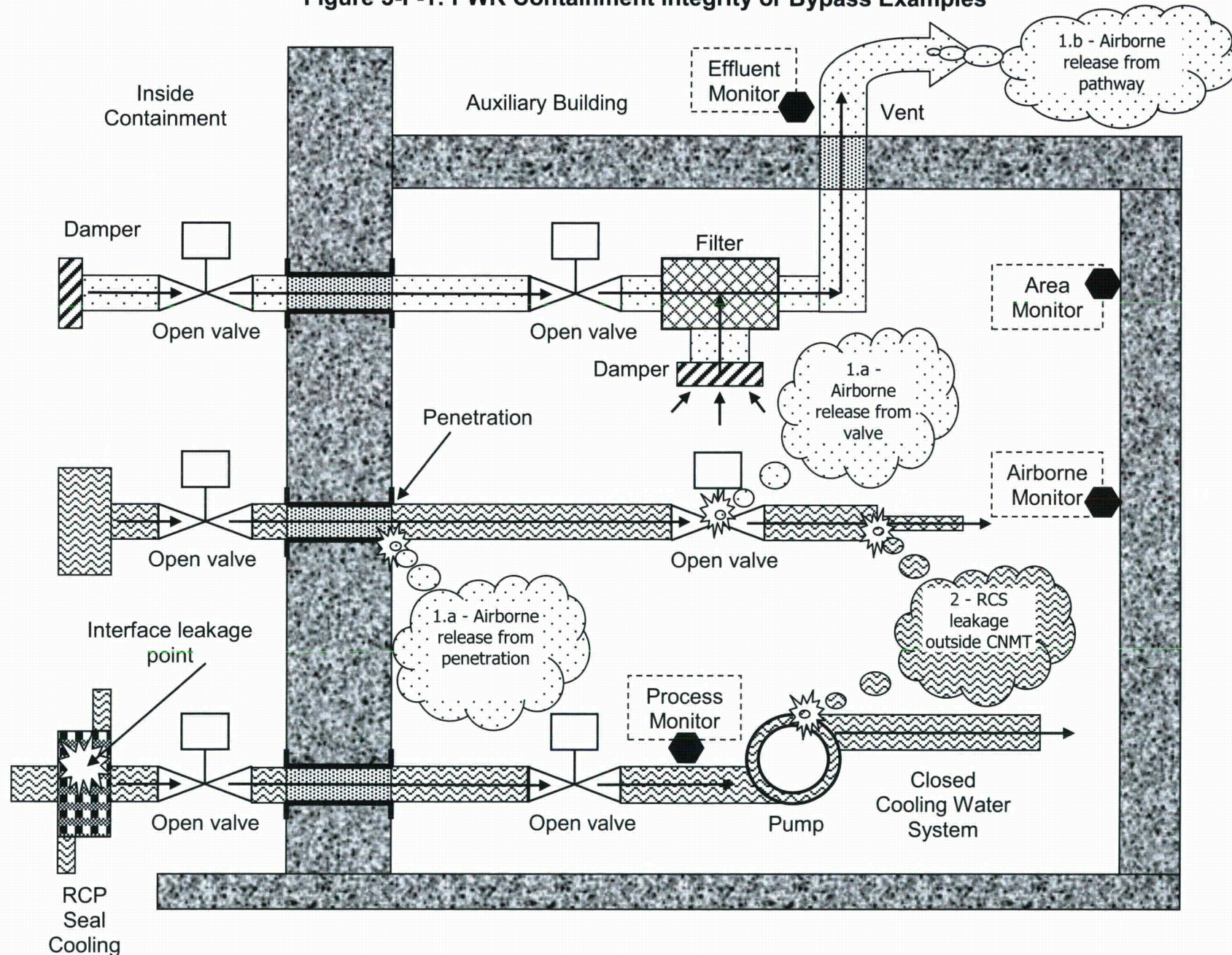
**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT4 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3
2. UFSAR Section 15.6.5.2.1
3. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
4. Technical Specifications B 3.6.6, Containment Spray and Cooling Systems
5. 1/2BwST-5 Containment
6. 1/2BwFR-Z.1 Response to High Containment Pressure

RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION
Figure 3-F-1: PWR Containment Integrity or Bypass Examples



**RECOGNITION CATEGORY
FISSION PRODUCT BARRIER DEGRADATION**

CT5**Initiating Condition:**

Emergency Director Judgment.

Operating Mode Applicability:

1, 2, 3, 4

Fission Product Barrier (FPB) Threshold:**LOSS**

1. Any condition in the opinion of the Emergency Director that indicates Loss of the Containment Barrier.

POTENTIAL LOSS

2. Any condition in the opinion of the Emergency Director that indicates Potential Loss of the Containment Barrier.

Basis:**Loss Threshold #1 Basis**

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Containment Barrier is lost.

Potential Loss Threshold #2 Basis

This threshold addresses any other factors that may be used by the Emergency Director in determining whether the Containment Barrier is potentially lost. The Emergency Director should also consider whether or not to declare the barrier potentially lost in the event that barrier status cannot be monitored.

Basis Reference(s):

1. NEI 99-01 Rev 6, Table 9-F-3

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG1****Initiating Condition:**

Prolonged loss of all offsite and all onsite AC power to emergency buses.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. Loss of **ALL** offsite AC power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. **EITHER** of the following:

- a. Restoration of at least one unit ESF bus in **< 4 hours** is not likely.

OR

- b. **Core Cooling CSF – Red Path** conditions exist.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a prolonged loss of all power sources to AC emergency buses. A loss of all AC power compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. A prolonged loss of these buses will lead to a loss of any fission product barriers. In addition, fission product barrier monitoring capabilities may be degraded under these conditions.

The EAL should require declaration of a General Emergency prior to meeting the thresholds for IC FG1. This will allow additional time for implementation of offsite protective actions.

Escalation of the emergency classification from Site Area Emergency will occur if it is projected that power cannot be restored to at least one AC emergency bus by the end of the analyzed station blackout coping period. Beyond this time, plant responses and

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG1 (cont)****Basis (cont):**

event trajectory are subject to greater uncertainty, and there is an increased likelihood of challenges to multiple fission product barriers.

The estimate for restoring at least one emergency bus should be based on a realistic appraisal of the situation. Mitigation actions with a low probability of success should not be used as a basis for delaying a classification upgrade. The goal is to maximize the time available to prepare for, and implement, protective actions for the public.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

The EAL will also require a General Emergency declaration if the loss of AC power results in parameters that indicate an inability to adequately remove decay heat from the core.

Basis Reference(s):

1. NEI 99-01 Rev 6, SG1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)
13. 1/2BwST-2 Core Cooling
14. 1/2BwFR-C.1 Response to Inadequate Core Cooling
15. 1/2BwFR-C.2 Response to Degraded Core Cooling

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS1****Initiating Condition:**

Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. Loss of **ALL** offsite AC Power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. Failure to restore power to at least one unit ESF bus in **< 15 minutes** from the time of loss of both offsite and onsite AC power

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a total loss of AC power that compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. In addition, fission product barrier monitoring capabilities may be degraded under these conditions. This IC represents a condition that involves actual or likely major failures of plant functions needed for the protection of the public.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via ICs RG1, FG1 or MG1.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS1 (cont)****Basis Reference(s):**

1. NEI 99-01 Rev 6, SS1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA1****Initiating Condition:**

Loss of all but one AC power source to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. AC power capability to unit ESF buses reduced to only one of the following power sources for **≥ 15 minutes**.

- Affected unit SAT 142-1(242-1)
- Affected unit SAT 142-2(242-2)
- Emergency Diesel Generator DG 1A(2A)
- Emergency Diesel Generator DG 1B(2B)
- Unit crosstie breakers

AND

2. Any additional single power source failure will result in a loss of **ALL** AC power to SAFETY SYSTEMS.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC describes a significant degradation of offsite and onsite AC power sources such that any additional single failure would result in a loss of all AC power to SAFETY SYSTEMS. In this condition, the sole AC power source may be powering one, or more than one, train of safety-related equipment. This IC provides an escalation path from IC MU1.

An "AC power source" is a source recognized in AOPs and EOPs, and capable of supplying required power to an emergency bus. Some examples of this condition are presented below.

- A loss of all offsite power with a concurrent failure of all but one emergency power source (e.g., an onsite diesel generator).

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA1 (cont)****Basis (cont):**

- A loss of all offsite power and loss of all emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from the unit main generator.
- A loss of emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from an offsite power source.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of power.

Escalation of the emergency classification level would be via IC MS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU1****Initiating Condition:**

Loss of all offsite AC power capability to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Loss of **ALL** offsite AC power capability to unit ESF buses for \geq 15 minutes.

Basis:

This IC addresses a prolonged loss of offsite power. The loss of offsite power sources renders the plant more vulnerable to a complete loss of power to AC emergency buses. This condition represents a potential reduction in the level of safety of the plant.

For emergency classification purposes, "capability" means that an offsite AC power source(s) is available to the emergency buses, whether or not the buses are powered from it. (e.g. unit cross-tie breakers)

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of offsite power.

Escalation of the emergency classification level would be via IC MA1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU1
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG2****Initiating Condition:**

Loss of all AC and Vital DC power sources for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. Loss of **ALL** offsite AC power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. Voltage is **< 108 VDC** on unit 125 VDC battery buses 111(211) and 112(212)

AND

4. **ALL** AC and Vital DC power sources have been lost for **≥ 15 minutes**.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a concurrent and prolonged loss of both AC and Vital DC power. A loss of all AC power compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink. A loss of Vital DC power compromises the ability to monitor and control SAFETY SYSTEMS. A sustained loss of both AC and DC power will lead to multiple challenges to fission product barriers.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses. The 15-minute emergency declaration clock begins at the point when all EAL conditions are met.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MG2 (cont)****Basis Reference(s):**

1. NEI 99-01 Rev 6, SG8
2. UFSAR 8.3.2.1.1
3. 20E-0-4001 Station One Line Diagram
4. BwAR 1/2-21-E10, 125V DC PNL 111/113(211/213) VOLT LOW
5. 1/2BwOA ELEC 1 Loss of DC Bus UNIT 1/2
6. BwAR 1/2-22-E10, 125V DC PNL 112/114 (212/214) VOLT LOW
7. UFSAR 8.3.1
8. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
9. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
10. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
11. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
12. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
13. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
14. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
15. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
16. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)
17. 1/2BwST-2 Core Cooling
18. 1/2BwFR-C.1 Response to Inadequate Core Cooling
19. 1/2BwFR-C.2 Response to Degraded Core Cooling

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS2****Initiating Condition:**

Loss of all vital DC power for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Voltage is **< 108 VDC** on unit 125 VDC battery buses 111(211) and 112(212) for **≥15 minutes**.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a loss of Vital DC power which compromises the ability to monitor and control SAFETY SYSTEMS. In modes above Cold Shutdown, this condition involves a major failure of plant functions needed for the protection of the public.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via ICs RG1, FG1 or MG3.

Basis Reference(s):

1. NEI 99-01 Rev 6, SS8
2. UFSAR 8.3.2.1.1
3. 20E-0-4001 Station One Line Diagram
4. BwAR 1/2-21-E10, 125V DC PNL 111/113(211/213) VOLT LOW
5. 1/2BwOA ELEC 1 Loss of DC Bus UNIT 1/2
6. BwAR 1/2-22-E10, 125V DC PNL 112/114 (212/214) VOLT LOW

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS3****Initiating Condition:**

Inability to shutdown the reactor causing a challenge to core cooling or RCS heat removal.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):

1. Automatic or Manual Trip did **not** shutdown the reactor as indicated by Reactor Power $\geq 5\%$.

AND

2. **ALL** manual actions to shutdown the reactor have been unsuccessful as indicated by Reactor Power $\geq 5\%$.

AND

3. **EITHER** of the following conditions exist:

- a. **Core Cooling CSF-RED Path** conditions exist.

OR

- b. **Heat Sink CSF-RED Path** conditions exist.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, all subsequent operator manual actions, both inside and outside the Control Room including driving in control rods and boron injection, are unsuccessful, and continued power generation is challenging the capability to adequately remove heat from the core and/or the RCS. This condition will lead to fuel damage if additional mitigation actions are unsuccessful and thus warrants the declaration of a Site Area Emergency.

If Core Cooling CSF Red Path or Heat Sink CSF Red Path conditions exist prior to a successful reactor shutdown (i.e. $< 5\%$ reactor power) then entry is required.

The Heat Sink Critical Safety Function Red path condition exists if narrow range levels in all steam generators (S/Gs) are less than or equal to 10% - Unit 1 (31% adverse containment) and 14% - Unit 2 (34% adverse containment) and total feedwater flow to all S/Gs is less than or equal to 500 gpm. If total feed flow is less than 500 gpm due to procedurally directed operator actions then this condition does not apply.

In some instances, the emergency classification resulting from this IC/EAL may be higher than that resulting from an assessment of the plant responses and symptoms against the Recognition Category F ICs/EALs. This is appropriate in that the Recognition Category F ICs/EALs do not address the additional threat posed by a failure to shutdown the reactor. The inclusion of this IC and EAL ensures the timely declaration of a Site Area Emergency in response to prolonged failure to shutdown the reactor.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MS3 (cont)****Basis (cont):**

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Escalation of the emergency classification level would be via IC RG1 or FG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SS5
2. 1/2BwST-1 Subcriticality
3. 1/2BwST-2 Core Cooling
4. 1/2BwST-3 Heat Sink
5. 1/2BwFR-S.1 Response to Nuclear Power Generation/ATWS
6. 1/2BwFR-H.1 Response to Loss of Secondary Heat Sink
7. 1/2BwFR C.1 Response to Inadequate Core Cooling
8. 1/2BwOSR 0.1-1,2,3 Unit One(Two) Modes 1, 2, And 3 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA3****Initiating Condition:**

Automatic or manual trip fails to shutdown the reactor, and subsequent manual actions taken at the reactor control consoles are not successful in shutting down the reactor.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):**Note:**

- A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.

1. Automatic or manual Trip did **not** shutdown the reactor as indicated by Reactor Power $\geq 5\%$.

AND

2. Manual actions taken at the Main Control Board are **not** successful in shutting down the reactor as indicated by Reactor Power $\geq 5\%$.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, and subsequent operator manual actions taken at the reactor control consoles to shutdown the reactor are also unsuccessful. This condition represents an actual or potential substantial degradation of the level of safety of the plant. An emergency declaration is required even if the reactor is subsequently shutdown by an action taken away from the reactor control consoles since this event entails a significant failure of the RPS.

A manual action at the Main Control Board is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core (e.g., initiating a manual reactor trip. This action does not include manually driving in control rods or implementation of boron injection strategies. If this action(s) is unsuccessful, operators would immediately pursue additional manual actions at locations away from the reactor control consoles (e.g., locally opening breakers). Actions taken at back-panels or other locations within the Control Room, or any location outside the Control Room, are not considered to be "at the Main Control Board".

The plant response to the failure of an automatic or manual reactor trip will vary based upon several factors including the reactor power level prior to the event, availability of the condenser, performance of mitigation equipment and actions, other concurrent plant conditions, etc. If the failure to shutdown the reactor is prolonged enough to cause a challenge to the core cooling or RCS heat removal safety functions, the emergency

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA3 (cont)****Basis (cont):**

classification level will escalate to a Site Area Emergency via IC MS3. Depending upon plant responses and symptoms, escalation is also possible via IC FS1. Absent the plant conditions needed to meet either IC MS3 or FS1, an Alert declaration is appropriate for this event.

It is recognized that plant responses or symptoms may also require an Alert declaration in accordance with the Recognition Category F ICs; however, this IC and EAL are included to ensure a timely emergency declaration.

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA5
2. 1/2BwST-1 Subcriticality
3. 1/2BwFR-S.1 Response to Nuclear Power Generation/ATWS
4. 1/2BwOSR 0.1-1,2,3 Unit One(Two) Modes 1, 2, And 3 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU3****Initiating Condition:**

Automatic or manual trip fails to shutdown the reactor.

Operating Mode Applicability:

1, 2

Emergency Action Level (EAL):**Note:**

- A manual action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not include manually driving in control rods or implementation of boron injection strategies.
1. a. Automatic Trip did not shutdown the reactor as indicated by Reactor Power $\geq 5\%$.
AND
b. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor.
OR
 2. a. Manual Trip did not shutdown the reactor as indicated by Reactor Power $\geq 5\%$.
AND
b. **EITHER** of the following:
 1. Subsequent manual action taken at the Main Control Board is successful in shutting down the reactor.
OR
 2. Subsequent Automatic Trip is successful in shutting down the reactor.

Basis:

This IC addresses a failure of the RPS to initiate or complete an automatic or manual reactor trip that results in a reactor shutdown, and either a subsequent operator manual action taken at the reactor control consoles or an automatic trip is successful in shutting down the reactor. This event is a precursor to a more significant condition and thus represents a potential degradation of the level of safety of the plant.

EAL #1 Basis

Following the failure on an automatic reactor trip, operators will promptly initiate manual actions at the reactor control consoles to shutdown the reactor (e.g., initiate a manual reactor trip). If these manual actions are successful in shutting down the reactor, core heat generation will quickly fall to a level within the capabilities of the plant's decay heat removal systems.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU3 (cont)****Basis (cont):****EAL #2 Basis**

If an initial manual reactor trip is unsuccessful, operators will promptly take manual action at another location(s) on the Main Control Board to shutdown the reactor (e.g., initiate a manual reactor trip using a different switch). Depending upon several factors, the initial or subsequent effort to manually trip the reactor, or a concurrent plant condition, may lead to the generation of an automatic reactor trip signal. If a subsequent manual or automatic trip is successful in shutting down the reactor, core heat generation will quickly fall to a level within the capabilities of the plant's decay heat removal systems.

A manual action at the Main Control Board is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core (e.g., initiating a manual reactor trip). This action does not include manually driving in control rods or implementation of boron injection strategies. Actions taken at back-panels or other locations within the Control Room, or any location outside the Control Room, are not considered to be "at the Main Control Board".

The plant response to the failure of an automatic or manual reactor trip will vary based upon several factors including the reactor power level prior to the event, availability of the condenser, performance of mitigation equipment and actions, other concurrent plant conditions, etc. If subsequent operator manual actions taken at the Main Control Board are also unsuccessful in shutting down the reactor, then the emergency classification level will escalate to an Alert via IC MA3. Depending upon the plant response, escalation is also possible via IC FA1. Absent the plant conditions needed to meet either IC MA3 or FA1, an Unusual Event declaration is appropriate for this event.

A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure criteria.

Should a reactor trip signal be generated as a result of plant work (e.g., RPS setpoint testing), the following classification guidance should be applied.

- If the signal generated as a result of plant work causes a plant transient that creates a real condition that should have included an automatic reactor trip and the RPS fails to automatically shutdown the reactor, then this IC and the EALs are applicable, and should be evaluated.
- If the signal generated as a result of plant work does not cause a plant transient but should have generated an RPS trip signal and the trip failure is determined through other means (e.g., assessment of test results), then this IC and the EALs are not applicable and no classification is warranted.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS**

MU3 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, SU5
2. 1/2BwST-1 Subcriticality
3. 1/2BwFR-S.1 Response to Nuclear Power Generation/ATWS
4. 1/2BwOSR 0.1-1,2,3 Unit One(Two) Modes 1, 2, And 3 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA4****Initiating Condition:**

UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥15 minutes**.

Table M1 – Control Room Parameters
<ul style="list-style-type: none">• Reactor Power• PZR Level• RCS Pressure• In Core/Core Exit Temperature• Narrow Range level in at least one Steam Generator• Steam generator Auxiliary Feed Water Flow

AND

2. **ANY** Table M2 transient in progress.

Table M2 – Significant Transients
<ul style="list-style-type: none">• Automatic Turbine Runback >25% thermal reactor power• Electrical Load Rejection >25% full electrical load• Reactor Trip• Safety Injection Actuation

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA4 (cont)****Basis:**

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses the difficulty associated with monitoring rapidly changing plant conditions during a transient without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. During this condition, the margin to a potential fission product barrier challenge is reduced. It thus represents a potential substantial degradation in the level of safety of the plant.

As used in this EAL, an "inability to monitor" means that values for any of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, computer point, digital and recorder source within the Control Room.

An event involving a loss of plant indications, annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine any of these parameters from within the Control Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for any of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from the indications and recorders on a main control board, the SPDS or the plant computer, the availability of other parameter values may be compromised as well.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation of the emergency classification level would be via ICs FS1 or IC RS1.

Basis Reference(s):

1. NEI 99-01 Rev 6, SA2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU4****Initiating Condition:**

UNPLANNED loss of Control Room indications for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

UNPLANNED event results in the inability to monitor **ANY** Table M1 parameters from within the Control Room for **≥ 15 minutes**.

Table M1 – Control Room Parameters
<ul style="list-style-type: none">• Reactor Power• PZR Level• RCS Pressure• In Core/Core Exit Temperature• Narrow Range level in at least one Steam Generator• Steam generator Auxiliary Feed Water Flow

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses the difficulty associated with monitoring normal plant conditions without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. This condition is a precursor to a more significant event and represents a potential degradation in the level of safety of the plant.

As used in this EAL, an “inability to monitor” means that values for any of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, digital and recorder source within the Control Room. An event involving a loss of plant indications,

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU4 (cont)****Basis (cont):**

annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine any of these parameters from within the Control Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for any of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from the indications and recorders on a main control board, the SPDS or the plant computer, the availability of other parameter values may be compromised as well.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation of the emergency classification level would be via IC MA4.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU2

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA5****Initiating Condition:**

Hazardous event affecting a SAFETY SYSTEM required for the current operating mode.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- If it is determined that the conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.

1. The occurrence of **ANY** of the following hazardous events:

- Seismic event (earthquake)
- Internal or external flooding event
- High winds or tornado strike
- FIRE
- EXPLOSION
- Other events with similar hazard characteristics as determined by the Shift Manager

AND

2. **EITHER** of the following:

- a. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.

OR

- b. The event has caused **VISIBLE DAMAGE** to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

Basis:

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

EXPLOSION: A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such events may require a post-event inspection to determine if the attributes of an explosion are present.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MA5 (cont)****Basis (cont):**

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

VISIBLE DAMAGE: Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

EAL #2.a addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

EAL #2.b addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, as well as damage to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC FS1 or RS1.

If the EAL conditions of MA5 are not met then assess the event via HU3, HU4, or HU6.

Basis Reference(s):

1. NEI 99-01, Rev 6 SA9

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU6****Initiating Condition:**

RCS leakage for 15 minutes or longer.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. RCS unidentified or pressure boundary leakage **> 10 gpm** for **≥ 15 minutes**.

OR

2. RCS identified leakage **>25 gpm** for **≥ 15 minutes**.

OR

3. Leakage from the RCS to a location outside containment **>25 gpm** for **≥ 15 minutes**.

Basis:

UNISOLABLE: An open or breached system line that cannot be isolated, remotely or locally.

Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification.

This IC addresses RCS leakage which may be a precursor to a more significant event. In this case, RCS leakage has been detected and operators, following applicable procedures, have been unable to promptly isolate the leak. This condition is considered to be a potential degradation of the level of safety of the plant.

EAL #1 and EAL #2 Basis

These EALs are focused on a loss of mass from the RCS due to "unidentified leakage", "pressure boundary leakage" or "identified leakage" (as these leakage types are defined in the plant Technical Specifications).

EAL #3 Basis

This EAL addresses a RCS mass loss caused by an UNISOLABLE leak through an interfacing system.

These EALs thus apply to leakage into the containment, a secondary-side system (e.g., steam generator tube leakage) or a location outside of containment.

The leak rate values for each EAL were selected because they are usually observable with normal Control Room indications. Lesser values typically require time-consuming calculations to determine (e.g., a mass balance calculation). EAL #1 uses a lower value that reflects the greater significance of unidentified or pressure boundary leakage.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU6 (cont)****Basis (cont):**

The release of mass from the RCS due to the as-designed/expected operation of a relief valve does not warrant an emergency classification. An emergency classification would be required if a mass loss is caused by a relief valve that is not functioning as designed/expected (e.g., a relief valve sticks open and the line flow cannot be isolated). The 15-minute threshold duration allows sufficient time for prompt operator actions to isolate the leakage, if possible.

Escalation of the emergency classification level would be via ICs of Recognition Category R or F.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU4
2. Technical Specifications 3.4.13 & 3.4.14
3. UFSAR 6.2, 5.24
4. 1/2BwOSR 3.4.13.1 Unit One(Two) Reactor Coolant System Water Inventory Balance Surveillance
5. LCOAR - RCS Leakage Detection Instrumentation – Tech Spec LCO 3.4.15
6. LCOAR – RCS Operational Leakage – Tech Spec LCO 3.4.13
7. 1/2BwOA PRI-1 Excessive Primary Leakage Unit 1/2
8. 1/2BwOSR 0.1-4 Unit One(Two) Modes 4 Shiftly and Daily Operating Surveillance
9. 1/2BwOS RF-1 Unit One(Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
10. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU7****Initiating Condition:**

Loss of all On-site or Off-site communications capabilities.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

1. Loss of **ALL** Table M3 **Onsite** communications capability affecting the ability to perform routine operations.

OR

2. Loss of **ALL** Table M3 **Offsite** communication capability affecting the ability to perform offsite notifications.

OR

3. Loss of **ALL** Table M3 **NRC** communication capability affecting the ability to perform NRC notifications.

Table M3 – Communications Capability			
System	Onsite	Offsite	NRC
Radios	X		
Plant page	X		
Plant Telephone System	X		
Commercial Telephones	X	X	X
NARS		X	
ENS		X	X
HPN		X	X
Satellite phones		X	X

Basis:

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points, individuals being sent to offsite locations, etc.).

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU7 (cont)****Basis (cont):****EAL #1 Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

EAL #2 Basis

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MW-114-100-F-01, Nuclear Accident Reporting System (NARS) Form.

EAL #3 Basis

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU6
2. UFSAR 9.5.2
3. EP-MW-124-1001 Facilities Inventories And Equipment Tests

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU8****Initiating Condition:**

Failure to isolate containment or loss of containment pressure control.

Operating Mode Applicability:

1, 2, 3, 4

Emergency Action Level (EAL):

1. a. Failure of containment to isolate when required by an actuation signal.
 AND
 b. **ANY** required penetration remains open > **15 minutes** of the actuation signal.
 OR
2. a. Containment pressure \geq **20 psig**.
 AND
 b. Less than one full train of Containment Spray is operating per design for \geq **15 minutes**.

Basis:

This IC addresses a failure of any containment penetrations to automatically isolate (close) when required by an actuation signal. It also addresses an event that results in high containment pressure with a concurrent failure of containment pressure control systems. Absent challenges to another fission product barrier, either condition represents potential degradation of the level of safety of the plant.

EAL #1 Basis

The containment isolation signal must be generated as the result on an off-normal/accident condition (e.g., a safety injection or high containment pressure); a failure resulting from testing or maintenance does not warrant classification. The determination of containment and penetration status – isolated or not isolated – should be made in accordance with the appropriate criteria contained in the plant AOPs and EOPs. The 15-minute criterion is included to allow operators time to manually isolate the required penetrations, if possible.

EAL #2 Basis

Addresses a condition where containment pressure is greater than the setpoint at which containment energy (heat) removal systems are designed to automatically actuate, and less than one full train of equipment is capable of operating per design. The 15-minute criterion is included to allow operators time to manually start equipment that may not have automatically started, if possible. The inability to start the required equipment indicates that containment heat removal/depressurization systems (e.g., containment sprays or ice condenser fans) are either lost or performing in a degraded manner.

**RECOGNITION CATEGORY
SYSTEM MALFUNCTIONS****MU8 (cont)****Basis (cont):**

This event would escalate to a Site Area Emergency in accordance with IC FS1 if there were a concurrent loss or potential loss of either the Fuel Clad or RCS fission product barriers.

Basis Reference(s):

1. NEI 99-01 Rev 6, SU7
2. 1/2BwST-5 Containment

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CA1

Initiating Condition:

Loss of all offsite and all onsite AC power to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. Loss of **ALL** offsite AC power to unit ESF buses.

AND

2. Failure of DG 1A(2A) and DG 1B(2B) emergency diesel generators to supply power to unit ESF buses.

AND

3. Failure to restore power to at least one unit ESF bus in **< 15 minutes** from the time of loss of both offsite and onsite AC power.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related

This IC addresses a total loss of AC power that compromises the performance of all SAFETY SYSTEMS requiring electric power including those necessary for emergency core cooling, containment heat removal/pressure control, spent fuel heat removal and the ultimate heat sink.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as a Site Area Emergency because of the increased time available to restore an emergency bus to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition represents an actual or potential substantial degradation of the level of safety of the plant.

The emergency buses of the affected unit can be powered from the unaffected unit through the crosstie breakers. Unit crosstie is considered an adequate source of offsite power when evaluating this EAL.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Escalation of the emergency classification level would be via IC CS6 or RS1.

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CA1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, CA2
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515,68516)

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU1**Initiating Condition:**

Loss of all but one AC power source to emergency buses for 15 minutes or longer.

Operating Mode Applicability:

5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
-
1. AC power capability to unit ESF buses reduced to only one of the following power sources for **≥ 15 minutes**.
 - Affected unit SAT 142-1(242-1)
 - Affected unit SAT 142-2(242-2)
 - Emergency Diesel Generator DG 1A(2A)
 - Emergency Diesel Generator DG 1B(2B)
 - Unit crosstie breakers
- AND**
2. Any additional single power source failure will result in a loss of **ALL** AC power to SAFETY SYSTEMS.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC describes a significant degradation of offsite and onsite AC power sources such that any additional single failure would result in a loss of all AC power to SAFETY SYSTEMS. In this condition, the sole AC power source may be powering one, or more than one, train of safety-related equipment.

When in the cold shutdown, refueling, or defueled mode, this condition is not classified as an Alert because of the increased time available to restore another power source to service. Additional time is available due to the reduced core decay heat load, and the lower temperatures and pressures in various plant systems. Thus, when in these modes, this condition is considered to be a potential degradation of the level of safety of the plant.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CU1 (cont)

Basis (cont):

An "AC power source" is a source recognized in AOPs and EOPs, and capable of supplying required power to an emergency bus. Some examples of this condition are presented below.

- A loss of all offsite power with a concurrent failure of all but one emergency power source (e.g., an onsite diesel generator).
- A loss of all offsite power and loss of all emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from the unit main generator.
- A loss of emergency power sources (e.g., onsite diesel generators) with a single train of emergency buses being back-fed from an offsite power source.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of power.

The subsequent loss of the remaining single power source would escalate the event to an Alert in accordance with IC CA1.

Basis Reference(s):

1. NEI 99-01 Rev 6 CU2
2. 20E-0-4001 Station One Line Diagram
3. UFSAR 8.3.1
4. 1/2BwOA ELEC-3 Loss Of 4KV ESF Bus
5. 1/2BwOA ELEC-4 Loss Of Offsite Power Unit 1/2
6. 1/2BwCA-0.0 Loss Of All AC Power Unit 1/2
7. 1/2BwCA-0.1 Loss Of All AC Power Recovery Without SI Required Unit 1/2
8. 1/2BwCA-0.2 Loss Of All AC Power Recovery With SI Required Unit 1/2
9. 1/2BwCA-0.3 Response To Opposite Unit Loss Of All AC Power
10. BwOP AP-37 Unit Two SAT Crosstie To Unit One ESF Bus
11. BwOP AP-38, Unit One SAT Crosstie To Unit Two ESF Bus
12. Safety Evaluations of the Byron Station and Braidwood Station Responses to the Station Blackout (SBO) Rule (TAC NOS. 68522, 68523 AND 68515, 68516)

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA2**Initiating Condition:**

Hazardous event affecting SAFETY SYSTEM required for the current operating mode.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- If it is determined that the conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

1. The occurrence of **ANY** of the following hazardous events:

- Seismic event (earthquake)
- Internal or external flooding event
- High winds or tornado strike
- FIRE
- EXPLOSION
- Other events with similar hazard characteristics as determined by the Shift Manager

AND

2. **EITHER** of the following:

- a. Event damage has caused indications of degraded performance in at least one train of a SAFETY SYSTEM required by Technical Specifications for the current operating mode.

OR

- b. The event has caused **VISIBLE DAMAGE** to a SAFETY SYSTEM component or structure required by Technical Specifications for the current operating mode.

Basis:

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

EXPLOSION: A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or overpressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such

RECOGNITION CATEGORY**COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

events may require a post-event inspection to determine if the attributes of an explosion are present.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CA2 (cont)

Basis (cont):

VISIBLE DAMAGE: Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

This IC addresses a hazardous event that causes damage to a SAFETY SYSTEM, or a structure containing SAFETY SYSTEM components, required for the current operating mode, "required", i.e. required to be operable by Technical Specifications for the current operating mode. This condition significantly reduces the margin to a loss or potential loss of a fission product barrier, and therefore represents an actual or potential substantial degradation of the level of safety of the plant. Manual or automatic electrical isolation of safety equipment due to flooding, in and of itself, does not constitute degraded performance and is classified under HU6.

EAL #2.a addresses damage to a SAFETY SYSTEM train that is required to be operable by Technical Specifications for the current operating mode, and is in operation since indications for it will be readily available. The indications of degraded performance should be significant enough to cause concern regarding the operability or reliability of the SAFETY SYSTEM train.

EAL #2.b addresses damage to a SAFETY SYSTEM component that is required to be operable by Technical Specifications for the current operating mode, and is not in operation or readily apparent through indications alone, or to a structure containing SAFETY SYSTEM components. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the emergency classification level would be via IC CS6 or RS1.

If the EAL conditions of CA2 are not met then assess the event via HU3, HU4, or HU6.

Basis Reference(s):

1. NEI 99-01 Rev 6, CA6

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CU3**Initiating Condition:**

Loss of Vital DC power for 15 minutes or longer.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

Voltage is **< 108 VDC** on required unit 125 VDC battery buses 111(211) and 112(212) for **≥ 15 minutes**.

Basis:

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses a loss of Vital DC power which compromises the ability to monitor and control operable SAFETY SYSTEMS when the plant is in the cold shutdown or refueling mode. In these modes, the core decay heat load has been significantly reduced, and coolant system temperatures and pressures are lower; these conditions rise the time available to restore a vital DC bus to service. Thus, this condition is considered to be a potential degradation of the level of safety of the plant.

As used in this EAL, "required" means the Vital DC buses necessary to support operation of the in-service, or operable, train or trains of SAFETY SYSTEM equipment. For example, if Train A is out-of-service (inoperable) for scheduled outage maintenance work and Train B is in-service (operable), then a loss of Vital DC power affecting Train B would require the declaration of an Unusual Event. A loss of Vital DC power to Train A would not warrant an emergency classification.

Fifteen minutes was selected as a threshold to exclude transient or momentary power losses.

Depending upon the event, escalation of the emergency classification level would be via IC CA6 or CA5, or an IC in Recognition Category R.

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CU3 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, CU4
2. UFSAR 8.3.2.1.1
3. 20E-0-4001 Station One Line Diagram
4. BwAR 1/2-21-E10, 125V DC PNL 111/113(211/213) VOLT LOW
5. 1/2BwOA ELEC 1 Loss of DC Bus UNIT 1/2
6. BwAR 1/2-22-E10, 125V DC PNL 112/114 (212/214) VOLT LOW

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU4

Initiating Condition:

Loss of all onsite or offsite communications capabilities.

Operating Mode Applicability:

5, 6, D

Emergency Action Level (EAL):

1. Loss of **ALL** Table C1 **Onsite** communications capability affecting the ability to perform routine operations.
OR
2. Loss of **ALL** Table C1 **Offsite** communication capability affecting the ability to perform offsite notifications.
OR
3. Loss of **ALL** Table C1 **NRC** communication capability affecting the ability to perform NRC notifications.

Table C1 – Communications Capability			
System	Onsite	Offsite	NRC
Radios	X		
Plant page	X		
Plant Telephone System	X		
Commercial Telephones	X	X	X
NARS		X	
ENS		X	X
HPN		X	X
Satellite phones		X	X

Basis:

This IC addresses a significant loss of on-site, offsite, or NRC communications capabilities. While not a direct challenge to plant or personnel safety, this event warrants prompt notifications to Offsite Response Organizations (OROs) and the NRC.

This IC should be assessed only when extraordinary means are being utilized to make communications possible (e.g., use of non-plant, privately owned equipment, relaying of on-site information via individuals or multiple radio transmission points, individuals being sent to offsite locations, etc.).

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CU4 (cont)

Basis (cont):**EAL #1 Basis**

Addresses a total loss of the communications methods used in support of routine plant operations.

EAL #2 Basis

Addresses a total loss of the communications methods used to notify all OROs of an emergency declaration. The OROs referred to here are listed in procedure EP-MW-114-100-F-01, Nuclear Accident Reporting System (NARS) Form.

EAL #3 Basis

Addresses a total loss of the communications methods used to notify the NRC of an emergency declaration.

Basis Reference(s):

1. NEI 99-01 Rev 6, CU5
2. EP-MW-124-1001 Facilities Inventories And Equipment Tests

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA5

Initiating Condition:

Inability to maintain the plant in cold shutdown.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.

1. UNPLANNED rise in RCS temperature > 200°F for > Table C2 duration.

OR

2. UNPLANNED RCS pressure rise > 10 psig as a result of temperature rise. (This EAL does not apply in solid plant conditions.)

Table C2 – RCS Heat-up Duration Thresholds		
RCS Status	Containment Closure Status	Heat-up Duration
Intact	Not Applicable	60 minutes*
Not Intact OR Reduced Inventory (<397 ft.)	Established	20 minutes*
	Not Established	0 minutes
* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, then EAL #1 is not applicable.		

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CA5 (cont)

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, etc.).

This IC addresses conditions involving a loss of decay heat removal capability or an addition of heat to the RCS in excess of that which can currently be removed. Either condition represents an actual or potential substantial degradation of the level of safety of the plant.

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

The RCS Heat-up Duration Thresholds table addresses a rise in RCS temperature when CONTAINMENT CLOSURE is established but the RCS is not intact, or RCS inventory is reduced (e.g., mid-loop operation in PWRs). The 20-minute criterion was included to allow time for operator action to address the temperature rise.

The RCS Heat-up Duration Thresholds table also addresses a rise in RCS temperature with the RCS intact. The status of CONTAINMENT CLOSURE is not crucial in this condition since the intact RCS is providing a high pressure barrier to a fission product release. The 60-minute time frame should allow sufficient time to address the temperature rise without a substantial degradation in plant safety.

Finally, in the case where there is a rise in RCS temperature, the RCS is not intact or is at reduced inventory, and CONTAINMENT CLOSURE is not established, no heat-up duration is allowed (i.e., 0 minutes). This is because 1) the evaporated reactor coolant may be released directly into the Containment atmosphere and subsequently to the environment, and 2) there is reduced reactor coolant inventory above the top of irradiated fuel.

EAL #2 Basis

Provides a pressure-based indication of RCS heat-up.

Escalation of the emergency classification level would be via IC CS6 or RS1.

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CA5 (cont)**Basis Reference(s):**

1. NEI 99-01 Rev 6, CA3
2. Technical Specification Table 1.1-1
3. 1/2BwOP RC-4 Reactor Coolant System Drain
4. 1/2BwGP 100-1 Plant Heatup
5. 1/2BwGP 100-5, Plant Shutdown and Cool Down
6. 1/2BwGP 100-6, Refueling Outage
7. 1/2BwOS XPC-W1 Unit One (Two) Containment Penetration Status Weekly Surveillance
8. 1/2BwOSR 3.4.3.1 Reactor Coolant System Pressure/Temperature Limit Surveillance

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU5**Initiating Condition:**

UNPLANNED rise in RCS temperature

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when heat removal function is available does not warrant classification.

1. UNPLANNED rise in RCS temperature > **200°F**.

OR

2. Loss of the following for **≥15 minutes**.

- **ALL** RCS temperature indications

AND

- **ALL** RCS level indications

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

This IC addresses an UNPLANNED rise in RCS temperature above the Technical Specification cold shutdown temperature limit, or the inability to determine RCS temperature and level, represents a potential degradation of the level of safety of the plant. If the RCS is not intact and CONTAINMENT CLOSURE is not established during this event, the Emergency Director should also refer to IC CA5.

RCS is intact when the RCS pressure boundary is in its normal condition for the Cold Shutdown mode of operation (e.g. no freeze seals, etc.).

A momentary UNPLANNED excursion above the Technical Specification cold shutdown temperature limit when the heat removal function is available does not warrant a classification.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CU5 (cont)

Basis (cont):

EAL #1 involves a loss of decay heat removal capability, or an addition of heat to the RCS in excess of that which can currently be removed, such that reactor coolant temperature cannot be maintained below the cold shutdown temperature limit specified in Technical Specifications. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

During an outage, the level in the reactor vessel will normally be maintained above the reactor vessel flange. Refueling evolutions that lower water level below the reactor vessel flange are carefully planned and controlled. A loss of forced decay heat removal at reduced inventory may result in a rapid rise in reactor coolant temperature depending on the time after shutdown.

EAL #2 reflects a condition where there has been a significant loss of instrumentation capability necessary to monitor RCS conditions and operators would be unable to monitor key parameters necessary to assure core decay heat removal. During this condition, there is no immediate threat of fuel damage because the core decay heat load has been reduced since the cessation of power operation.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.

Escalation to Alert would be via IC CA6 based on an inventory loss or IC CA5 based on exceeding plant configuration-specific time criteria.

Basis Reference(s):

1. NEI 99-01 Rev 6, CU3
2. Technical Specifications Table 1.1-1
3. 1/2BwOSR 0.1-6 Unit One(Two) Mode 6 Shiftly And Daily Operating Surveillance
4. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
5. BwOP RC-4 Reactor Coolant System Drain
6. 1/2BwOSR 3.3.3.1 Unit One(Two) Accident Monitoring Instrumentation Monthly Channel Checks
7. LCOAR - RCS Leakage Detection Instrumentation – Tech Spec LCO 3.4.15
8. LCOAR – RCS Operational Leakage – Tech Spec LCO 3.4.13
9. 1/2BwOSR 3.4.3.1 Reactor Coolant System Pressure/Temperature Limit Surveillance

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CG6**Initiating Condition:**

Loss of reactor vessel/RCS inventory affecting fuel clad integrity with containment challenged.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. a. RVLIS indicates **0% Plenum** for **≥ 30 minutes**.

OR

Reactor Vessel Refueling Level Indicators LT-046 and LT-049 **< 392 ft. el.** for **≥ 30 minutes**.

AND

- b. **ANY** Containment Challenge Indication (Table C4)

OR

2. a. Reactor vessel / RCS level **cannot** be monitored for **≥ 30 minutes**.

AND

- b. Core uncover is indicated by **ANY** of the following:

- Table C3 indications of a sufficient magnitude to indicate core uncover.

OR

- Erratic Source Range Neutron Monitor indication.

OR

- 1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors **> 3000 mR/hr**.

AND

- c. Any Containment Challenge Indication (Table C4)

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CG6 (cont)

Emergency Action Level (EAL) (cont):

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

Table C4 – Containment Challenge Indications
<ul style="list-style-type: none">• Hydrogen Concentration in Containment $\geq 5\%$• UNPLANNED rise in containment pressure• CONTAINMENT CLOSURE <u>not</u> established*
* if CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute core uncover time limit, then escalation to a General Emergency is not required.

Basis:

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses the inability to restore and maintain reactor vessel level above the top of active fuel with containment challenged. This condition represents 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 Guidelines (PAG) exposure levels offsite for more than the immediate site area.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CG6 (cont)

Basis (cont):

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable.

With CONTAINMENT CLOSURE not established, there is a high potential for a direct and unmonitored release of radioactivity to the environment. If CONTAINMENT CLOSURE is re-established prior to exceeding the 30-minute time limit, then declaration of a General Emergency is not required.

The existence of an explosive mixture means, at a minimum, that the containment atmospheric hydrogen concentration is sufficient to support a hydrogen burn (i.e., at the lower deflagration limit). A hydrogen burn will raise containment pressure and could result in collateral equipment damage leading to a loss of containment integrity. It therefore represents a challenge to Containment integrity.

In the early stages of a core uncover event, it is unlikely that hydrogen buildup due to a core uncover could result in an explosive gas mixture in containment. If all installed

hydrogen gas monitors are out-of-service during an event leading to fuel cladding damage, it may not be possible to obtain a containment hydrogen gas concentration reading as ambient conditions within the containment will preclude personnel access.

During periods when installed containment hydrogen gas monitors are out-of-service, operators may use the other listed indications to assess whether or not containment is challenged.

The 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

The inability to monitor reactor vessel/RCS level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CG6 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, CG1
2. 1/2BwOS XPC-W1 Unit One (Two) Containment Penetration Status Weekly Surveillance
3. UFSAR E.17
4. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
5. BwOP RC-4 Reactor Coolant System Drain
6. UFSAR 6.2
7. 1/2BwOSR 0.1-4 Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance
8. 1/2BwOS RF-1 Unit One (Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
9. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
10. 1/2BwGP 100-2 Plant Startup
11. 1/2BwGP 100-6T4 Defueled to Mode 6 Checklist
12. 1/2BwOSR 3.3.3.1 Unit One(Two) Accident Monitoring Instrumentation Monthly Channel Checks
13. 1/2BwFR-C.1, Response to Inadequate Core Cooling Unit 1/2
14. 1/2BwST-5 Containment
15. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
16. UFSAR stat Section 6.2.5.2.1
17. EP-EAL-0501, Estimation Of Radiation Monitor Readings Indicating Core Uncovery During Refueling

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CS6**Initiating Condition:**

Loss of reactor vessel/RCS inventory affecting core decay heat removal capability.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. With CONTAINMENT CLOSURE established **EITHER:**

- RVLIS indicates **0% Plenum**

OR

- Reactor Vessel Refueling Level Indicators LT-046 and LT-049 **< 392 ft el.**

OR

2. With CONTAINMENT CLOSURE not established **EITHER:**

- RVLIS **\leq 15% Plenum**

OR

- Reactor Vessel Refueling Level Indicators LT-046 and LT-049
< 393 ft. el.

OR

3. a. Reactor vessel / RCS level cannot be monitored for **\geq 30 minutes.**

AND

b. Core uncover is indicated by **ANY** of the following:

- Table C3 indications of a sufficient magnitude to indicate core uncover.

OR

- Erratic Source Range Neutron Monitor indication.

OR

- 1/2 RE-AR011 or 1/2 RE-AR12 Containment Fuel Handling Incident radiation monitors **> 3000 mR/hr.**

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CS6 (cont)

Emergency Action Level (EAL) (cont):

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

Basis:

CONTAINMENT CLOSURE: The procedurally defined conditions or actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under shutdown conditions.

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

The lost inventory may be due to a RCS component failure, a loss of configuration control or prolonged boiling of reactor coolant. These conditions entail major failures of plant functions needed for protection of the public and thus warrant a Site Area Emergency declaration.

Following an extended loss of core decay heat removal and inventory makeup, decay heat will cause reactor coolant boiling and a further reduction in reactor vessel level. If RCS/reactor vessel level cannot be restored, fuel damage is probable.

Outage/shutdown contingency plans typically provide for re-establishing or verifying CONTAINMENT CLOSURE following a loss of heat removal or RCS inventory control functions.

The 30-minute criterion is tied to a readily recognizable event start time (i.e., the total loss of ability to monitor level), and allows sufficient time to monitor, assess and correlate reactor and plant conditions to determine if core uncover has actually occurred (i.e., to account for various accident progression and instrumentation uncertainties). It also allows sufficient time for performance of actions to terminate leakage, recover inventory control/makeup equipment and/or restore level monitoring.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CS6 (cont)

Basis (cont):

The inability to monitor reactor vessel/RCS level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

These EALs address concerns raised by Generic Letter 88-17, *Loss of Decay Heat Removal*; SECY 91-283, *Evaluation of Shutdown and Low Power Risk Issues*; NUREG-1449, *Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States*; and NUMARC 91-06, *Guidelines for Industry Actions to Assess Shutdown Management*.

Escalation of the emergency classification level would be via IC CG6 or RG1.

Basis Reference(s):

1. NEI 99-01 Rev 6, CS1
2. UFSAR E.17
3. UFSAR 6.2
4. NES-G-14.02, Calculation No. BYR99-010 / BRW-99-0017-I
5. UFSAR stat Section 6.2.5.2.1
6. EP-EAL-0501, Estimation of Radiation Monitor Readings Indicating Core Uncovery During Refueling
7. 1/2BwOSR 0.1-4 Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance
8. 1/2BwOS RF-1 Unit One (Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
9. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
10. 1/2BwOSR 0.1-4, Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance
11. 1/2BwGP 100-2 Plant Startup
12. 1/2BwGP 100-6T4 Defueled to Mode 6 Checklist
13. 1/2BwOSR 3.3.3.1 Unit One (Two) Accident Monitoring Instrumentation Monthly Channel Checks
14. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
15. BwOP RC-4 Reactor Coolant System Drain
16. 1/2BwOS XPC-W1 Unit One (Two) Containment Penetration Status Weekly Surveillance

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS**

CA6**Initiating Condition:**

Loss of reactor vessel/RCS inventory.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. a. Loss of RCS / Reactor Vessel inventory as indicated RVLIS < **37% Plenum**.

OR

- b. Loss of RCS / Reactor Vessel inventory as indicated by LT-046 and LT-049 < **393.4 ft. el.**

OR

2. a. Reactor vessel / RCS level **cannot** be monitored for **≥ 15 minutes**.

AND

- b. Loss of RCS / Reactor Vessel inventory per Table C3 indications.

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CA6 (cont)

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses conditions that are precursors to a loss of the ability to adequately cool irradiated fuel (i.e., a precursor to a challenge to the fuel clad barrier). This condition represents a potential substantial reduction in the level of plant safety.

A lowering of water level below indicated RVLIS < **37% Plenum** or LT-046 and LT-049 indicating < **393.4 ft. el.** indicates that operator actions have not been successful in restoring and maintaining reactor vessel/RCS water level. The heat-up rate of the coolant will rise as the available water inventory is reduced. A continuing drop in water level will lead to core uncover.

Although related, EAL #1 is concerned with the loss of RCS inventory and not the potential concurrent effects on systems needed for decay heat removal (e.g., loss of a Residual Heat Removal suction point). A rise in RCS temperature caused by a loss of decay heat removal capability is evaluated under IC CA5.

The inability to monitor reactor vessel/RCS level may be caused by instrumentation and/or power failures, or water level dropping below the range of available instrumentation. If water level cannot be monitored, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

The 15-minute duration for the loss of level indication was chosen because it is half of the Threshold duration specified in IC CS6

If the reactor vessel/RCS inventory level continues to lower, then escalation to Site Area Emergency would be via IC CS6.

Basis Reference(s):

1. NEI 99-01 Rev 6, CA1
2. UFSAR 6.2 & E.17
3. 1/2BwOA PRI-10
4. 1/2BwOS RF-1 Unit One (Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
5. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
6. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
7. BwOP RC-4 Reactor Coolant System Drain
8. 1/2BwOSR 0.1-4 Unit One (Two) Modes 4 Shiftly and Daily Operating Surveillance

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

CU6**Initiating Condition:**

UNPLANNED loss of reactor vessel/RCS inventory for 15 minutes or longer.

Operating Mode Applicability:

5, 6

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.

1. UNPLANNED loss of reactor coolant results in the inability to restore and maintain Reactor Vessel / RCS level to **> procedurally established lower limit for ≥ 15 minutes.**

OR

2. a. Reactor vessel / RCS level **cannot** be monitored.

AND

- b. Loss of RCS / Reactor Vessel inventory per Table C3 indications.

Table C3 – Indications of RCS Leakage
<ul style="list-style-type: none">• UNPLANNED Containment Sump level rise*• UNPLANNED Auxiliary Bldg. Sump level rise*• UNPLANNED Tank level (rad waste) rise*• UNPLANNED rise in RCS makeup• Observation of leakage or inventory loss
*Rise in level is attributed to a loss of reactor vessel/RCS inventory.

Basis:

UNPLANNED: A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

This IC addresses the inability to restore and maintain water level to a required minimum level (or the lower limit of a level band), or a loss of the ability to monitor reactor vessel/RCS level concurrent with indications of coolant leakage. Either of these conditions is considered to be a potential degradation of the level of safety of the plant.

**RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS****CU6 (cont)****Basis (cont):**

Refueling evolutions that decrease RCS water inventory are carefully planned and controlled. An UNPLANNED event that results in water level decreasing below a procedurally required limit warrants the declaration of an Unusual Event due to the reduced water inventory that is available to keep the core covered.

EAL #1 recognizes that the minimum required reactor vessel/RCS level can change several times during the course of a refueling outage as different plant configurations and system lineups are implemented. This EAL is met if the minimum level, specified for the current plant conditions, cannot be maintained for 15 minutes or longer. The minimum level is typically specified in the applicable operating procedure but may be specified in another controlling document.

The procedurally established lower limit is not an operational band established above the procedural limit to allow for operator action prior to exceeding the procedural limit, but it is the procedurally established lower limit.

The 15-minute threshold duration allows sufficient time for prompt operator actions to restore and maintain the expected water level. This criterion excludes transient conditions causing a brief lowering of water level.

EAL #2 addresses a condition where all means to determine reactor vessel/RCS level have been lost. In this condition, operators may determine that an inventory loss is occurring by observing changes in sump and/or tank levels. Sump and/or tank level changes must be evaluated against other potential sources of water flow to ensure they are indicative of leakage from the reactor vessel/RCS.

Continued loss of RCS inventory may result in escalation to the Alert emergency classification level via either IC CA6 or CA5.

RECOGNITION CATEGORY
COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS
CU6 (cont)

Basis Reference(s):

1. NEI 99-01, Rev. 6 CU1
2. UFSAR 6.2 & E.17
3. 1/2BwOSR 0.1-4 Unit One(Two) Modes 4 Shiftly and Daily Operating Surveillance
4. 1/2BwOS RF-1 Unit One(Two) Containment Floor Drain Monitoring System Non-Routine Surveillance
5. 1/2BwOS XCB-R1 U0 and U1 MCR Meter Color Banding
6. BwOP RH-9 Pump Down of the Reactor Cavity to the RWSTs
7. BwOP RC-4 Reactor Coolant System Drain
8. UFSAR 5.2
9. 1/2BwOSR 3.4.13.1 Unit One(Two) Reactor Coolant System Water Inventory Balance Surveillance
10. 1/2BwOL 3.4.15 LCOAR - Reactor Coolant System Leakage - Leakage Detection Systems
11. 1/2BwOA PRI-1 Excessive Primary Leakage Unit 1/2
12. 1/2BwOSR 0.1-4 Unit One(Two) Modes 6 Shiftly and Daily Operating Surveillance

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HG1**Initiating Condition:**

HOSTILE ACTION resulting in loss of physical control of the facility.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

AND

2. a. **ANY** Table H1 safety function **cannot** be controlled or maintained.

OR

- b. Damage to spent fuel has occurred or is IMMINENT

Table H1 – Safety Functions

- | |
|---|
| <ul style="list-style-type: none">• Reactivity Control (ability to shut down the reactor and keep it shutdown)• Core Cooling (ability to cool the core)• RCS Heat Removal (ability to maintain heat sink) |
|---|

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HG1 (cont)

Basis (cont):

HOSTILE FORCE: Any individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

This IC addresses an event in which a HOSTILE FORCE has taken physical control of the facility to the extent that the plant staff can no longer operate equipment necessary to maintain key safety functions. It also addresses a HOSTILE ACTION leading to a loss of physical control that results in actual or IMMINENT damage to spent fuel due to 1) damage to a spent fuel pool cooling system (e.g., pumps, heat exchangers, controls, etc.) or, 2) loss of spent fuel pool integrity such that sufficient water level cannot be maintained.

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

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

Basis Reference(s):

1. NEI 99-01, Rev. 6 HG1
5. Station Security Plan – Appendix C

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HS1**Initiating Condition:**

HOSTILE ACTION within the PROTECTED AREA.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

A notification from the Security Force that a HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: Any individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI): A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

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

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

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HS1 (cont)

Basis (cont):

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

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

This IC does not apply to a HOSTILE ACTION directed at an ISFSI PROTECTED AREA located outside the plant PROTECTED AREA; such an attack should be assessed using IC HA1. It also does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

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

Basis Reference(s):

1. NEI 99-01 Rev 6, HS1
3. Station Security Plan – Appendix C

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY

HA1

Initiating Condition:

HOSTILE ACTION within the OWNER CONTROLLED AREA or airborne attack threat within 30 minutes.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. A validated notification from NRC of an aircraft attack threat < **30 minutes** from the site.

OR

2. Notification by the Security Force that a HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

OWNER CONTROLLED AREA (OCA): The property associated with the station and owned by the company. Access is normally limited to persons entering for official business.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

HOSTILE FORCE: Any individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

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

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HA1 (cont)

Basis (cont):

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

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

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

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

EAL #1 addresses the threat from the impact of an aircraft on the plant, and the anticipated arrival time is within 30 minutes. The intent of this EAL is to ensure that threat-related notifications are made in a timely manner so that plant personnel and OROs are in a heightened state of readiness. This EAL is met when the threat-related information has been validated in accordance with 0BWOA Security-1, Security Threat.

EAL #2 is applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA. This includes any action directed against an ISFSI that is located outside the plant PROTECTED AREA.

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

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

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

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HA1 (cont)

Basis Reference(s):

1. NEI 99-01 Rev 6, HA1
2. Station Security Plan – Appendix C

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU1**Initiating Condition:**

Confirmed SECURITY CONDITION or threat.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

1. Notification of a credible security threat directed at the site as determined per SY-AA-101-132, Security Assessment and Response to Unusual Activities.

OR

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

OR

3. Notification by the Security Force of a SECURITY CONDITION that does **not** involve a HOSTILE ACTION.

Basis:

SECURITY CONDITION: Any Security Event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A SECURITY CONDITION does not involve a HOSTILE ACTION

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU1 (cont)

Basis (cont):

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

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

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

EAL #1 Basis

Addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with SY-AA-101-132, Security Assessment and Response to Unusual Events..

EAL #2 Basis

Addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with 0BwOA Security-1, Security Threat.

EAL #3 Basis

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

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

Basis Reference(s):

1. NEI 99-01 Rev 6, HU1
2. Station Security Plan – Appendix C
3. NRC Safeguards Advisory 10/6/01
4. Letter from Mr. B. A. Boger (NRC) to Ms. Lynette Hendricks (NEI) dated 2/4/02
5. 0BwOA Security-1, Security Threat
6. SY-AA-101-132, Security Assessment and Response to Unusual Events

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HS2**Initiating Condition:**

Inability to control a key safety function from outside the Control Room.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
-
1. A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BwOA PRI-5, Control Room Inaccessibility.
- AND**
2. Control of **ANY** Table H1 key safety function is **not** reestablished in **< 15 minutes**.

Table H1 – Safety Functions
<ul style="list-style-type: none">• Reactivity Control (ability to shut down the reactor and keep it shutdown)• Core Cooling (ability to cool the core)• RCS Heat Removal (ability to maintain heat sink)

Basis:

The time period to establish control of the plant starts when either:

- a. Control of the plant is no longer maintained in the Main Control Room
- OR
- b. The last Operator has left the Main Control Room.

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations, and the control of a key safety function cannot be reestablished in a timely manner. The failure to gain control of a key safety function following a transfer of plant control to alternate locations is a precursor to a challenge to any fission product barriers within a relatively short period of time.

The determination of whether or not “control” is established at the remote safe shutdown location(s) is based on Emergency Director judgment. The Emergency Director is expected to make a reasonable, informed judgment within 15 minutes whether or not the operating staff has control of key safety functions from the remote safe shutdown location(s).

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HS2 (cont)

Basis (cont):

Escalation of the emergency classification level would be via IC FG1 or CG6.

Basis Reference(s):

1. NEI 99-01, Rev 6 HS6
2. 1/2BwOA PRI-5, Control Room Inaccessibility

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HA2**Initiating Condition:**

Control Room evacuation resulting in transfer of plant control to alternate locations.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

A Control Room evacuation has resulted in plant control being transferred from the Control Room to alternate locations per 1/2BwOA PRI-5, Control Room Inaccessibility.

Basis:

This IC addresses an evacuation of the Control Room that results in transfer of plant control to alternate locations outside the Control Room. The loss of the ability to control the plant from the Control Room is considered to be a potential substantial degradation in the level of plant safety.

Following a Control Room evacuation, control of the plant will be transferred to alternate shutdown locations. The necessity to control a plant shutdown from outside the Control Room, in addition to responding to the event that required the evacuation of the Control Room, will present challenges to plant operators and other on-shift personnel. Activation of the ERO and emergency response facilities will assist in responding to these challenges.

Escalation of the emergency classification level would be via IC HS2.

Basis Reference(s):

1. NEI 99-01, Rev 6 HA6
2. 1/2BwOA PRI-5, Control Room Inaccessibility

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU3**Initiating Condition:**

FIRE potentially degrading the level of safety of the plant.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- The Emergency Director should declare the event promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- Escalation of the emergency classification level would be via IC CA2 or MA5

1. A FIRE in **ANY** Table H2 area is **not** extinguished in **< 15-minutes** of **ANY** of the following FIRE detection indications:

- Report from the field (i.e., visual observation)
- Receipt of multiple (more than 1) fire alarms or indications
- Field verification of a single fire alarm

OR

2. a. Receipt of a single fire alarm in **ANY** Table H2 area (i.e., no other indications of a FIRE).

AND

- b. The existence of a FIRE is **not** verified in **< 30 minutes** of alarm receipt.

OR

3. A FIRE within the plant PROTECTED AREA not extinguished in **< 60-minutes** of the initial report, alarm or indication.

OR

4. A FIRE within the plant PROTECTED AREA that requires firefighting support by an offsite fire response agency to extinguish.

Table H2 – Vital Areas
<ul style="list-style-type: none">• Containment• Auxiliary Building• Fuel Handling Building• Main Steam Tunnels• RWST's• Condensate Storage Tanks• Lake Screen House

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU3 (cont)

Basis:

FIRE: Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

This IC addresses the magnitude and extent of FIRES that may be indicative of a potential degradation of the level of safety of the plant.

EAL #1 Basis

The intent of the 15-minute duration is to size the FIRE and to discriminate against small FIRES that are readily extinguished (e.g., smoldering waste paper basket). In addition to alarms, other indications of a FIRE could be a drop in fire main pressure, automatic activation of a suppression system, etc.

Upon receipt, operators will take prompt actions to confirm the validity of an initial fire alarm, indication, or report. For EAL assessment purposes, the emergency declaration clock starts at the time that the initial alarm, indication, or report was received, and not the time that a subsequent verification action was performed. Similarly, the fire duration clock also starts at the time of receipt of the initial alarms, indication or report.

EAL #2 Basis

This EAL addresses receipt of a single fire alarm, and the existence of a FIRE is not verified (i.e., proved or disproved) within 30-minutes of the alarm. Upon receipt, operators will take prompt actions to confirm the validity of a single fire alarm. For EAL assessment purposes, the 30-minute clock starts at the time that the initial alarm was received, and not the time that a subsequent verification action was performed.

A single fire alarm, absent other indication(s) of a FIRE, may be indicative of equipment failure or a spurious activation, and not an actual FIRE. For this reason, additional time is allowed to verify the validity of the alarm. The 30-minute period is a reasonable amount of time to determine if an actual FIRE exists; however, after that time, and absent information to the contrary, it is assumed that an actual FIRE is in progress.

If an actual FIRE is verified by a report from the field, then EAL #1 is immediately applicable, and the emergency must be declared if the FIRE is not extinguished within 15-minutes of the report. If the alarm is verified to be due to an equipment failure or a spurious activation, and this verification occurs within 30-minutes of the receipt of the alarm, then this EAL is not applicable and no emergency declaration is warranted.

EAL #3 Basis

In addition to a FIRE addressed by EAL #1 or EAL #2, a FIRE within the plant PROTECTED AREA not extinguished within 60-minutes may also potentially degrade the level of plant safety.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU3 (cont)

Basis (cont):**EAL #4 Basis**

If a FIRE within the plant PROTECTED AREA is of sufficient size to require a response by an offsite firefighting agency (e.g., a local town Fire Department), then the level of plant safety is potentially degraded. The dispatch of an offsite firefighting agency to the site requires an emergency declaration only if it is needed to actively support firefighting efforts because the fire is beyond the capability of the Fire Brigade to extinguish. Declaration is not necessary if the agency resources are placed on stand-by, or supporting post-extinguishment recovery or investigation actions.

ISFSI is not specifically addressed in EAL #3 and #4 since it is within the plant PROTECTED AREA and is therefore covered under EALs #3 and #4.

Basis-Related Requirements from Appendix R

Appendix R to 10 CFR 50, states in part:

Criterion 3 of Appendix A to this part specifies that "Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions."

When considering the effects of fire, those systems associated with achieving and maintaining safe shutdown conditions assume major importance to safety because damage to them can lead to core damage resulting from loss of coolant through boil-off.

Because fire may affect safe shutdown systems and because the loss of function of systems used to mitigate the consequences of design basis accidents under post-fire conditions does not per se impact public safety, the need to limit fire damage to systems required to achieve and maintain safe shutdown conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design basis accidents.

In addition, Appendix R to 10 CFR 50, requires, among other considerations, the use of 1-hour fire barriers for the enclosure of cable and equipment and associated non-safety circuits of one redundant train (G.2.c). As used in EAL #2, the 30-minutes to verify a single alarm is well within this worst-case 1-hour time period.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU4
2. UFSAR Section 3.2
3. Drawing S-01A Composite Site Plan
4. BwAP-1100, Fire Protection Procedures

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU4**Initiating Condition:**

Seismic event greater than OBE levels.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- Escalation of the emergency classification level would be via IC CA2 or MA5
- For emergency classification if EAL 2.b is not able to be confirmed, then the occurrence of a seismic event is confirmed in manner deemed appropriate by the Shift Manager or Emergency Director in **≤ 15 mins** of the event.

1. Seismic event **> Operating Basis Earthquake (OBE)** as indicated by seismic check at panel 0PA02J.

OR

2. When Seismic Monitoring Equipment is **not** available:

a. Control Room personnel feel an actual or potential seismic event.

AND

b. **ANY** one of the following confirmed in **≤ 15 mins** of the event:

- The earthquake resulted in Modified Mercalli Intensity (MMI) **$\geq VI$** and occurred **≤ 3.5 miles** of the plant.
- The earthquake was magnitude **≥ 6.0**
- The earthquake was magnitude **≥ 5.0** and occurred **≤ 125 miles** of the plant.

Basis:

This IC addresses a seismic event that results in accelerations at the plant site greater than those specified for an Operating Basis Earthquake (OBE)¹. An earthquake greater than an OBE but less than a Safe Shutdown Earthquake (SSE)² should have no significant impact on safety-related systems, structures and components; however, some time may be required for the plant staff to ascertain the actual post-event

¹ An OBE is vibratory ground motion for which those features of a nuclear power plant necessary for continued operation without undue risk to the health and safety of the public will remain functional.

² An SSE is vibratory ground motion for which certain (generally, safety-related) structures, systems, and components must be designed to remain functional.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU4 (cont)

Basis (cont):

condition of the plant (e.g., performs walk-downs and post-event inspections). Given the time necessary to perform walk-downs and inspections, and fully understand any impacts, this event represents a potential degradation of the level of safety of the plant.

Event verification with external sources should not be necessary during or following an OBE. Earthquakes of this magnitude should be readily felt by on-site personnel and recognized as a seismic event (e.g., typical lateral accelerations are in excess of 0.08g). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., a call to the USGS, check internet news sources, etc.); however, the verification action must not preclude a timely emergency declaration.

EAL #2.b and the accompanying note is included to ensure that a declaration does not result from felt vibrations caused by a non-seismic source (e.g., a dropped load). The Shift Manager or Emergency Director may seek external verification if deemed appropriate (e.g., call to USGS, check internet source, etc.) however, the verification action must not preclude a timely emergency declaration. This guidance recognizes that it may cause the site to declare an Unusual Event while another site, similarly affected but with readily available OBE indications in the Control Room, may not.

Depending upon the plant mode at the time of the event, escalation of the emergency classification level would be via IC CA2 or MA5.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU2
2. 0BwOA ENV-4 Earthquake
3. Annunciator 0-38-E5 Accelograph Accel High
4. US NRC Reg. Guide 1.166, Pre-Earthquake Planning and Immediate Nuclear Power Plant Operator Earthquake Actions.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY

HA5

Initiating Condition:

Gaseous release impeding access to equipment necessary for normal plant operations, cooldown or shutdown.

Operating Mode Applicability:

4, 5, 6

Emergency Action Level (EAL):**Note:**

- If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted.

1. Release of a toxic, corrosive, asphyxiant or flammable gas in **ANY** Table H3 area.

Table H3 Areas with Entry Related Mode Applicability	
Area	Entry Related Mode Applicability
Auxiliary Building 426' VCT Valve Aisle	Mode 4, 5, and 6
Auxiliary Building 401' Curved Wall Area Penetration Area	
Auxiliary Building 383' Remote Shutdown Panel Area	
Auxiliary Building 364' CV Pp areas Curved Wall Area	
Auxiliary Building 346' RH pump areas	

AND

2. Entry into the room or area is prohibited or impeded.

Basis:

This IC addresses an event involving a release of a hazardous gas that precludes or impedes access to equipment necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal plant procedures. This

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HA5 (cont)

Basis (cont):

condition represents an actual or potential substantial degradation of the level of safety of the plant.

Assuming all plant equipment is operating as designed, normal operation capable from the Main Control Room (MCR). The plant is also able to transition into a hot shutdown condition from the MCR, therefore Table H3 is a list of plant rooms or areas with entry-related mode applicability that contain equipment which require a manual/local action necessary to transition the plant from normal plant operation to cooldown and shutdown as specified in normal operating procedures (establish shutdown cooling), where if this action is not completed the plant would not be able to attain and maintain cold shutdown. This Table does not include rooms or areas for which entry is required solely to perform actions of an administrative or record keeping nature (e.g., normal rounds or routine inspections).

This Table does not include the Control Room since adequate engineered safety/design features are in place to preclude a Control Room evacuation due to the release of a hazardous gas.

An Alert declaration is warranted if entry into the affected room/area is, or may be, procedurally required during the plant operating mode in effect and the gaseous release preclude the ability to place shutdown cooling in service. The emergency classification is not contingent upon whether entry is actually necessary at the time of the release.

Evaluation of the IC and EAL do not require atmospheric sampling; it only requires the Emergency Director's judgment that the gas concentration in the affected room/area is sufficient to preclude or significantly impede procedurally required access. This judgment may be based on a variety of factors including an existing job hazard analysis, report of ill effects on personnel, advice from a subject matter expert or operating experience with the same or similar hazards. Access should be considered as impeded if extraordinary measures are necessary to facilitate entry of personnel into the affected room/area (e.g., requiring use of protective equipment, such as SCBAs, that is not routinely employed).

An emergency declaration is not warranted if any of the following conditions apply.

- The plant is in an operating mode different than the mode specified for the affected room/area (i.e., entry is not required during the operating mode in effect at the time of the gaseous release). For example, the plant is in Mode 1 when the gaseous release occurs, and the procedures used for normal operation, cooldown and shutdown do not require entry into the affected room until Mode 4.
- The gas release is a planned activity that includes compensatory measures which address the temporary inaccessibility of a room or area (e.g., fire suppression system testing).
- The action for which room/area entry is required is of an administrative or record keeping nature (e.g., normal rounds or routine inspections).

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HA5 (cont)

Basis (cont):

- The access control measures are of a conservative or precautionary nature, and would not actually prevent or impede a required action.

An asphyxiant is a gas capable of reducing the level of oxygen in the body to dangerous levels. Most commonly, asphyxiants work by merely displacing air in an enclosed environment. This reduces the concentration of oxygen below the normal level of around 19%, which can lead to breathing difficulties, unconsciousness or even death.

This EAL does not apply to firefighting activities, that generate smoke or that automatically or manually activate a fire suppression system in an area.

The Operating Mode Applicability of this EAL has been revised from All Modes to modes 4, 5, and 6 due to the mode applicability of the areas of concern in Table H-3. In the future should the areas of concern in Table H-3 be revised then the Operating Mode Applicability of this EAL should be reevaluated.

Escalation of the emergency classification level would be via Recognition Category R, C or F ICs.

Basis Reference(s):

1. NEI 99-01, Rev 6 HA5
2. UFSAR Section 3.2
3. ACIT 660892-12, Station Halon Discharge IDLH Evaluation

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU6**Initiating Condition:**

Hazardous Event

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):**Note:**

- EAL #4 does not apply to routine traffic impediments such as fog, snow, ice, or vehicle breakdowns or accidents.
- Escalation of the emergency classification level would be via IC CA2 or MA5

1. Tornado strike within the PROTECTED AREA.

OR

2. Internal room or area flooding of a magnitude sufficient to require manual or automatic electrical isolation of a SAFETY SYSTEM component required by Technical Specifications for the current operating mode.

OR

3. Movement of personnel within the PROTECTED AREA is impeded due to an offsite event involving hazardous materials (e.g., an offsite chemical spill or toxic gas release).

OR

4. A hazardous event that results in on-site conditions sufficient to prohibit the plant staff from accessing the site via personal vehicles.

Basis:

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

SAFETY SYSTEM: A system required for safe plant operation, cooling down the plant and/or placing it in the cold shutdown condition, including the ECCS. These are typically systems classified as safety-related.

This IC addresses hazardous events that are considered to represent a potential degradation of the level of safety of the plant.

EAL #1 Basis

Addresses a tornado striking (touching down) within the Protected Area.

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
HU6 (cont)

Basis (cont):**EAL #2 Basis**

Addresses flooding of a building room or area that results in operators isolating power to a SAFETY SYSTEM component due to water level or other wetting concerns. Classification is also required if the water level or related wetting causes an automatic isolation of a SAFETY SYSTEM component from its power source (e.g., a breaker or relay trip). To warrant classification, operability of the affected component must be required by Technical Specifications for the current operating mode.

EAL #3 Basis

Addresses a hazardous materials event originating at an offsite location and of sufficient magnitude to impede the movement of personnel within the PROTECTED AREA.

EAL #4 Basis

Addresses a hazardous event that causes an on-site impediment to vehicle movement and significant enough to prohibit the plant staff from accessing the site using personal vehicles. Examples of such an event include site flooding caused by a hurricane, heavy rains, up-river water releases, dam failure, etc., or an on-site train derailment blocking the access road.

This EAL is not intended to apply to routine impediments such as fog, snow, ice, or vehicle breakdowns or accidents, but rather to more significant conditions such as the Hurricane Andrew strike on Turkey Point in 1992, the flooding around the Cooper Station during the Midwest floods of 1993, or the flooding around Ft. Calhoun Station in 2011.

Escalation of the emergency classification level would be based on ICs in Recognition Categories R, F, M, H or C.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU3

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HG7**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a GENERAL EMERGENCY.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or IMMINENT substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.

Basis:

IMMINENT: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a General Emergency.

Basis Reference(s):

1. NEI 99-01, Rev 6 HG7

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY

HS7

Initiating Condition:

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a SITE AREA EMERGENCY.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts, (1) toward site personnel or equipment that could lead to the likely failure of or, (2) that prevent effective access to equipment needed for the 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.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for a Site Area Emergency.

Basis Reference(s):

1. NEI 99-01, Rev 6 HS7

RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY

HA7

Initiating Condition:

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an ALERT.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which, in the judgment of the Emergency Director, indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

Basis:

HOSTILE ACTION: An act toward a NPP or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station

PROJECTILE: An object directed toward a NPP that could cause concern for its continued operability, reliability, or personnel safety.

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an Alert.

Basis Reference(s):

1. NEI 99-01, Rev 6 HA7

**RECOGNITION CATEGORY
HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY**

HU7**Initiating Condition:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an UNUSUAL EVENT.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

Basis:

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the emergency classification level description for an UNUSUAL EVENT.

Basis Reference(s):

1. NEI 99-01, Rev 6 HU7

**RECOGNITION CATEGORY
ISFSI MALFUNCTIONS****E-HU1****Initiating Condition**

Damage to a loaded cask CONFINEMENT BOUNDARY.

Operating Mode Applicability:

1, 2, 3, 4, 5, 6, D

Emergency Action Level (EAL):

Damage to a loaded cask CONFINEMENT BOUNDARY as indicated by an on-contact radiation reading:

- > 40mr/hr (gamma + neutron) on the top of the spent fuel cask
OR
- > 220mr/hr (gamma + neutron) on the side of the spent fuel cask, excluding inlet and outlet ducts

Basis:

CONFINEMENT BOUNDARY: The irradiated fuel dry storage cask barrier(s) between areas containing radioactive substances and the environment.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) : A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

This IC addresses an event that results in damage to the CONFINEMENT BOUNDARY of a storage cask containing spent fuel. It applies to irradiated fuel that is licensed for dry storage beginning at the point that the loaded storage cask is sealed. The word cask, as used in this EAL, refers to the storage container in use at the site for dry storage of irradiated fuel. The issues of concern are the creation of a potential or actual release path to the environment, degradation of any fuel assemblies due to environmental factors, and configuration changes which could cause challenges in removing the cask or fuel from storage.

The existence of "damage" is determined by radiological survey. The technical specification multiple of "2 times", which is also used in Recognition Category R IC RU1, is used here to distinguish between non-emergency and emergency conditions. The emphasis for this classification is the degradation in the level of safety of the spent fuel cask and not the magnitude of the associated dose or dose rate. It is recognized that in the case of extreme damage to a loaded cask, the fact that the "on-contact" dose rate limit is exceeded may be determined based on measurement of a dose rate at some distance from the cask.

Security-related events for ISFSIs are covered under ICs HU1 and HA1.

Basis Reference(s):

1. NEI 99-01, Rev 6 E-HU1
2. Certificate of Compliance No. 1014 Appendix A Section 5.7