



FEB 15 2018

10 CFR 50.54(q)
10 CFR 50.4(b)(5)

LR-N18-0028

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Salem Nuclear Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

Hope Creek Generating Station
Renewed Facility Operating License No. NPF-57
NRC Docket No. 50-354

Subject: Emergency Plan Document Revision Implemented December 6, 2017 and
January 30, 2018

Pursuant to 10 CFR 50.54(q) and 10 CFR 50.4(b)(5), PSEG Nuclear LLC (PSEG) hereby submits 10 CFR 50.54(q) Summary Analysis Reports (ID#2017-67 and ID# 2017-73) for Emergency Plan Document revisions implemented on December 6, 2017 and January 30, 2018 (Attachment 1) and a copy of the revised documents in their entirety (Enclosure 1) associated with the PSEG Nuclear LLC Emergency Plan.

There are no regulatory commitments contained in this letter.

This letter, Attachment 1, and Enclosure 1 do not contain any personal privacy, proprietary, or safeguards information for which protection is requested under the provisions for 10 CFR 2.390.

If you have any questions or require additional information, please contact Philip Quick, Emergency Preparedness Program Manager, at 856-339-3262.

Respectfully,

A handwritten signature in black ink, appearing to read "S. Barr".

Stephen Barr
Manager - Emergency Preparedness

Attachment 1 – 10 CFR 50.54(q) Summary Analysis Reports

Enclosure 1 – Emergency Plan Document Revisions: EP-AA-124, Rev. 2
EP-HC-111-210, Rev. 1
EP-SA-111-210, Rev. 1

cc (without enclosures):

Administrator, Region I, NRC
Ms. C. Parker, Project Manager, NRC
NRC Senior Resident Inspector, Salem
NRC Senior Resident Inspector, Hope Creek
P. Mulligan, Chief, NJBNE
Commitment Tracking Coordinator, Salem
Commitment Tracking Coordinator, Hope Creek
Corporate Commitment Tracking Coordinator

LR-N18-0028

Attachment 1

10 CFR 50.54(q) Summary Analysis Reports

10 CFR 50.54(q) SUMMARY ANALYSIS REPORT

50.54Q I.D. Number: 2017-67

50.54Q Title: EP-AA-124, Revision 2, Communications Drills and Inventories
(Doc #, Rev. #, Name, If applicable)

Description of the change made to the Emergency Plan/Procedures:

EP-AA-124 is being revised to reorganize and consolidate emergency response facility (ERF) communications drills, inventories, and equipment tests. The frequencies of multiple activities are being changed to better align with the PSEG Nuclear Emergency Plan and to gain efficiencies when performing regular facility maintenance activities.

Description of why the change is editorial (if not editorial, N/A this block):

N/A

Description of the licensing basis affected by the change to the Emergency Plan/Procedure (if not affected, omit this element):

This change does not result in any Emergency Plan changes but is instead intended to better align with the Emergency Plan. Specifically, Section 15 describes the requirements for communications drills.

A description of how the change to the Emergency Plan/Procedures still complies with regulation:

EP-AA-124 contains the frequencies of the inventories, equipment tests, and communications drills. Most activities are staying at the same frequency or are proposed to be conducted on a more frequent basis. The inventory activities for the TSCs, OSCs, EOF, and ENC are all being adjusted to a frequency of "after use with a minimum of 2 times per year". The prior frequency of "after use and one time per quarter" had no basis in the Emergency Plan or regulations and was done because those activities were combined with other quarterly activities. Performing the inventories after use, whether it is due to a drill or an actual event, ensures that the supplies in the facility are restored after they have been used and potentially depleted. If a facility is not used, the inventory will still be conducted at a minimum of twice per year in order to ensure that the supply levels remain adequate. The Control Point (CP) inventory item is not currently performed by EP but instead is covered under the CP RP Inventory activity. Therefore, there is no actual change for the frequency of the CP inventory.

For the monthly required Federal (NRC) call, the Emergency Plan makes the following statement in section 15: "A communications drill to NRC Headquarters and the NRC Regional Office Operations Center from the Control Rooms, TSCs and EOF is completed monthly." This requirement is satisfied by the monthly calls made to the NRC Headquarters Operations Center.

A description of why the proposed change was not a reduction in the effectiveness of the Emergency Plan/Procedure:

The proposed change will not have an impact on the effectiveness of the PSEG Nuclear Emergency Plan. It ensures that emergency response facilities are maintained in a state of readiness and that adequate communications are available.

10 CFR 50.54(q) SUMMARY ANALYSIS REPORT

50.54Q I.D. Number: **2017-73**

50.54Q Title: **EP-HC/SA-111-210, EAL Technical Basis – Hazards and Other Conditions Affecting Plant Safety – Security**

(Doc #, Rev. #, Name, If applicable)

<p>Description of the change made to the Emergency Plan/Procedures:</p> <p>EP-HC/SA-111-210, EAL Technical Basis – Hazards and Other Conditions Affecting Plant Safety – Security are being revised. HU4.1, HA4.1 and HS4.1 of EP-HC/SA-111-210 include a table titled Security Contingency Event Summary Table. This table contains a list of 20 contingency events and possible classification levels for those events. This revision adds contingency event 21 and the possible classification levels for those events.</p>
<p>Description of why the change is editorial (if not editorial, N/A this block):</p> <p>N/A</p>
<p>Description of the licensing basis affected by the change to the Emergency Plan/Procedure (if not affected, omit this element):</p> <p>Documents reviewed include: Emergency Plan Section 5 – Emergency Classification System, 3.0 Event Classification Guide (ECG). NEI 99-01 Revision 5 – Methodology for Development of Emergency Action Levels, Condition HU4, EAL #1 This threshold is based on site specific security plans. Site specific Safeguards Contingency Plans are based on guidance provided by NEI 03-12. NEI 03-12 – Template for Security Plans, NEI 03-12 Revision 7 includes Security Event 21. Salem and Hope Creek Security Plan, The Salem and Hope Creek Security Plan was updated (revision 21) to comply with NEI 03-12 revision 7. The Security Plan now includes Security Event 21 and the requirement to inform the Operating Crew of the event and classification requirements based on the severity of the event.</p>
<p>A description of how the change to the Emergency Plan/Procedures still complies with regulation:</p> <p>There is a definitive link between NEI 03-12 and NEI 99-01. A revision to NEI 03-12 was implemented that required a new Security Event 21. To ensure compliance with the requirements of NEI 03-12 and NEI 99-01, it will be necessary to add Security Event 21 to the list of applicable Security Events in the Emergency Classification Guide.</p>
<p>A description of why the proposed change was not a reduction in the effectiveness of the Emergency Plan/Procedure:</p> <p>The proposed change will ensure compliance with the Salem and Hope Creek Security Plan. The change is required as a result of the addition of Security Event 21 to NEI 03-12 and the subsequent adoption of Security Event 21 in the Salem and Hope Creek Security Plan. There will be no reduction in effectiveness of Emergency Plan functions as a result of this change.</p>

LR-N18-0028

Enclosure 1

**Emergency Plan Document Revisions
Implemented December 6, 2017 and January 30, 2018**

EP-AA-124, Communications Drills and Inventories, Revision 2

EP-HC-111-210, Security, Revision 1

EP-SA-111-210, Security, Revision 1

PSEG NUCLEAR L.L.C
PSEG Nuclear Common
EMERGENCY PREPAREDNESS
EP-AA-124 - Rev. 2
COMMUNICATIONS DRILLS AND INVENTORIES


ADHERENCE LEVEL: LEVEL 2 - REFERENCE USE

Configuration Change Packages and Affected Document Numbers incorporated into this revision:

- None

License Renewal Related: Yes ☐ No ☒

Revision Summary	
Location	Description of Change
Entire Procedure	<ul style="list-style-type: none">• Procedure converted to new procedure template.• Replaced “Surveillances” with “Drills” in title of procedure to align with the Emergency Plan. Added “Communications” to title of procedure.• Restructured procedure to align by type of action being performed and not by facility.
Step 2.2	Changed title to “Communications Drills” and changed definition to align with Emergency Plan Section 15, Step 2.2.1.
Step 2.3	Changed title to “Facility Inventory” to differentiate between a facility and radiation protection inventory.
Step 2.4	Added definition of a “Radiation Protection Inventory”.
Step 2.5	Added definition of an “Equipment Test”.
Step 3.1	Changed title to match current organizational structure.
Step 3.3	Changed due to change in organizational structure.
Step 4.1.2	Deleted the word “corrective” and added guidance on how to deal with any issues identified during the performance of the inventory/test.
Step 4.2.1	<ul style="list-style-type: none">• Changed requirement to perform facility inventory to after use basis and at a minimum on a semi-annual basis.• Deleted the requirement to perform an inventory in the Control Rooms because EP is not responsible for maintaining stationery them.• Deleted the requirement to perform an inventory and equipment tests because EP is not responsible for maintaining stationery or equipment tests in the Control Points. The Control Point fax is tested through the equipment tests performed from the Control Rooms, TSCs, and the EOF.

	PSEG Nuclear Common		Page 2 of 8
		LEVEL 2 - REFERENCE USE	
EP-AA-124			Rev: 2
COMMUNICATIONS DRILLS AND INVENTORIES			

Step 4.3.1	<ul style="list-style-type: none"> Added requirement to perform Radiation Protection inventory if the seal has been broken to align with EP-AA-124-1002. Added new step for the on-site emergency vehicle radiation protection inventory.
Step 4.4.1	Added requirement to complete an equipment test in the OSCs.
Step 4.6	Added requirement to perform Emergency Diesel Engine tests.
Step 4.8	Added note to document that by conducting a communication drill with the "NRC Headquarters Operations Center" satisfies the Emergency Plan Requirement to conduct a communication drill with the "NRC Regional Office".
Step 4.7	Added requirement to perform EOF Ventilation tests.
Step 4.5	Added "Communications" to the title.
Step 4.4.1	Added clarification to test the primary communication lines on a monthly basis and which facilities it has to be performed from to align with the Emergency Plan.
Step 4.4.2	New step to test the secondary communication lines on a quarterly basis and which facility it has to be performed from to align with the Emergency Plan.
Section 5.0	Updated references that were referred to within the procedure or were used to develop the procedure.
Step 6.0	In first bullet changed "attachment" to "form" to align with document type.



	PSEG Nuclear Common		Page 3 of 8
		LEVEL 2 - REFERENCE USE	
EP-AA-124			Rev: 2
COMMUNICATIONS DRILLS AND INVENTORIES			

TABLE OF CONTENTS

SECTION	PAGE
1.0 PURPOSE AND SCOPE	4
2.0 DEFINITIONS	4
3.0 RESPONSIBILITIES	5
4.0 INSTRUCTIONS	5
4.1 Inventories and Equipment Tests.....	5
4.2 Facility Inventories	6
4.3 Radiation Protection Inventories.....	6
4.4 Equipment Tests.....	6
4.5 Emergency Response Data System (ERDS).....	6
4.6 EOF Emergency Diesel Engine Tests	7
4.7 EOF Ventilation Tests.....	7
4.8 Communications Drills.....	7
5.0 REFERENCES AND COMMITMENTS	8
6.0 RECORDS	8

	PSEG Nuclear Common		Page 4 of 8
		LEVEL 2 - REFERENCE USE	
EP-AA-124			Rev: 2
COMMUNICATIONS DRILLS AND INVENTORIES			

1.0 **PURPOSE AND SCOPE**

1.1 **Purpose**

- 1.1.1. The purpose of this procedure is to describe the process used to ensure that the emergency facilities and equipment are inspected and inventoried in accordance with the emergency plan.

1.2 **Scope**

- 1.2.1. None

2.0 **DEFINITIONS**

2.1 **Test**

- 2.1.1. A review to ensure equipment is functional.

2.2 **Communications Drills**

- 2.2.1. Test of the primary and secondary communications links between Control Rooms, TSCs, and EOF and the appropriate state and local government contact points.

2.3 **Facility Inventory**

- 2.3.1. Verification that required material and equipment is available.

2.4 **Radiation Protection Inventory**

- 2.4.1. Verification that required Radiation Protection material and equipment is available.

2.5 **Equipment Test**

- 2.5.1. Verification that required equipment is functional.

2.6 **Monthly (M)**


- 2.6.1. Once per calendar month.

2.7 **Quarterly**

- 2.7.1. A three calendar month period. The 1st quarter being the months of January, February and March; the 2nd quarter being April, May and June; the 3rd quarter being July, August and September; and the 4th quarter being October, November and December.

2.8 **Annual (A)**

- 2.8.1. Once every calendar year (January 1 - December 31).

	PSEG Nuclear Common		Page 5 of 8
		LEVEL 2 - REFERENCE USE	
EP-AA-124			Rev: 2
COMMUNICATIONS DRILLS AND INVENTORIES			

2.9 Semi-Annual (S)

2.9.1. Twice per calendar year (1st: January 1 - June 30; and 2nd: July 1 - December 31).

2.10 Biennial (B)

2.10.1. Once every other calendar year.

2.11 18 month

2.11.1. Once every 18 months.

3.0 RESPONSIBILITIES

3.1 Manager - Emergency Preparedness

- The overall development, conduct and evaluation of inventories and tests pertaining to the Emergency Plan.
- Ensure completion of inventories and tests for the EOF and ENC/JIC as applicable, in support of the offsite Emergency Preparedness Program.

3.2 Emergency Preparedness Station Manager

- Provide station support for the conduct of inventories and tests of station related equipment and facilities.

3.3 EP Staff

- Perform or ensure completion of the applicable inventories and tests.


4.0 INSTRUCTIONS

4.1 Inventories and Equipment Tests

4.1.1. **CONDUCT** the following inventories and tests at specified frequencies, and after exercises or actual events. These inventories and tests are intended to verify the readiness of the facility or material for an emergency.

4.1.2. **DOCUMENT** any inventory or test on the appropriate checklist or recurring task per EP-AA-124-1001. List the actions to resolve the discrepancies (i.e. IT Tickets for telecommunication issues, documentation of supplies that need to be replenished, etc.).

1. A Condition Report should be initiated IAW LS-AA-120 to document a deficiency that would impact a facility's operability or the ability to perform a required function.

	PSEG Nuclear Common		Page 6 of 8
		LEVEL 2 - REFERENCE USE	
EP-AA-124			Rev: 2
COMMUNICATIONS DRILLS AND INVENTORIES			

4.2 Facility Inventories

4.2.1. **PERFORM** a facility inventory after each use of a facility for a drill, exercise, or actual event. At a minimum, the facility **MUST** be inventoried on a semi-annual basis per EP-AA-124-1001. Below are the facilities that are to be inventoried:

- Salem and Hope Creek Technical Support Centers (TSCs)
- Salem and Hope Creek Operational Support Centers (OSCs)
- Emergency Operations Facility (EOF)
- Emergency News Center/Joint Information Center (ENC/JIC)

4.3 Radiation Protection Inventories

4.3.1. **PERFORM** Radiation Protection Inventory once per quarter and after each drill exercise, actual event, **IF** the seal on any locker/kit has been broken per EP-AA-124-1002. Below are the facilities/vehicles that are to be inventoried:

- Salem and Hope Creek Control Rooms/OSCs
- Salem and Hope Creek Technical Support Centers (TSCs)
- Salem and Hope Creek Control Points (CPs)
- Salem and Hope Creek Emergency Vehicles
- Emergency Operations Facility (EOF)


4.4 Equipment Tests

4.4.1. **PERFORM** equipment test once per quarter per EP-AA-124-1001 in the following facilities:

- Salem and Hope Creek Control Rooms (CRs)
- Salem and Hope Creek Technical Support Centers (TSCs)
- Salem and Hope Creek Operational Support Centers (OSCs)
- Emergency Operations Facility (EOF)
- Emergency News Center/Joint Information Center (ENC/JIC)

4.5 Emergency Response Data System (ERDS)

4.5.1. **PERFORM** the equipment test once per quarter per NC.EP-FT.ZZ-0006(Q), and NC.EP-FT.ZZ-0007(Q).

	PSEG Nuclear Common		Page 7 of 8
		LEVEL 2 - REFERENCE USE	
EP-AA-124			Rev: 2
COMMUNICATIONS DRILLS AND INVENTORIES			

4.6 EOF Emergency Diesel Engine Tests

- 4.6.1. **PERFORM** no-load test of the EOF Emergency Diesel Engine once per month per NC.EP-FT.ZZ-0008(Q).
- 4.6.2. **PERFORM** load test of the EOF Emergency Diesel Engine once per year per NC.EP-FT.ZZ-0008(Q).

4.7 EOF Ventilation Tests

- 4.7.1. **PERFORM** EOF Ventilation Test once per year per NC.EP-FT.ZZ-0009(Q).
- 4.7.2. **PERFORM** EOF HVAC DOP Test once every 18 months per NC.EP-FT.ZZ-0009(Q).


NOTE

A communications drill conducted with the "NRC Headquarters Operations Center" will satisfy the requirement to communicate with the NRC Headquarters and the NRC Regional Office Operations Center per Section 2.2.1 of the PSEG Nuclear Emergency Plan, Section 15.

4.8 Communications Drills

- 4.8.1. **PERFORM** the communications drills on the primary lines once per month per EP-AA-124-1001 from the following facilities:
- Salem and Hope Creek Control Rooms (CRs)
 - Salem and Hope Creek Technical Support Centers (TSCs)
 - Emergency Operations Facility (EOF)
- 4.8.2. **PERFORM** the communications drills on the secondary lines once per quarter per EP-AA-124-1001 from one of the following facilities:
- Salem or Hope Creek Control Room (CR) or
 - Salem or Hope Creek Technical Support Center (TSC) or
 - Emergency Operations Facility (EOF)
- 4.8.3. **PERFORM** communications drills for off-site and on-site field team vehicles once per year per EP-AA-124-1001.

END of Instructions

	PSEG Nuclear Common		Page 8 of 8
		LEVEL 2 - REFERENCE USE	
EP-AA-124			Rev: 2
COMMUNICATIONS DRILLS AND INVENTORIES			

5.0 REFERENCES AND COMMITMENTS

5.1 Performance References

- 5.1.1. EP-AA-124-1001, Emergency Response Facility Inventories and Equipment Tests
- 5.1.2. EP-AA-124-1002, Emergency Preparedness Inventory Radiation Protection
- 5.1.3. LS-AA-120, Issue Identification and Screening Process
- 5.1.4. NC.EP-FT.ZZ-0006(Q), Emergency Response Data System (ERDS) Test with NRC Salem Station
- 5.1.5. NC.EP-FT.ZZ-0007(Q), Emergency Response Data System (ERDS) Test with NRC Hope Creek Station
- 5.1.6. NC.EP-FT.ZZ-0008(Q), Operational Testing of the EOF Emergency Diesel Engine
- 5.1.7. NC.EP-FT.ZZ-0009(Q), Emergency Operations Facility (EOF) Ventilation System Testing
- 5.1.8. RM-AA-101, Records Management Program

5.2 Developmental References

- 5.2.1. NUREG-0654, Section H, Bullet 10
- 5.2.2. NUREG-0654, Section N
- 5.2.3. NUREG-0696, Section 4.7
- 5.2.4. PSEG Nuclear Emergency Plan, Section 9, Emergency Facilities and Equipment
- 5.2.5. PSEG Nuclear Emergency Plan, Section 15, Exercises and Drills

5.3 Commitments

- 5.3.1. None

6.0 RECORDS

- Each associated Functional Test/T&RM Form provides for the documentation of the inventory or test.
- Completed inventory/test checklists (hard copy or electronic) shall be retained IAW the Records Management Program.

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: Confirmed **SECURITY CONDITION** or threat which indicates a potential degradation in the level of safety of the plant

OPCON Applicability: All

EAL# & Classification Level: HU4.1 – UNUSUAL EVENT (Common Site)

EAL:

A **SECURITY CONDITION** that does NOT involve a **HOSTILE ACTION** as reported by the Security Operations Supervisor or designee (Note 9)

OR

Receipt of a **CREDIBLE/ACTUAL THREAT** to Salem or Hope Creek station – (determined by security in accordance with SY-AA-101-132, “Threat Assessment”) (Note 9)

OR

A **VALIDATED** notification from NRC providing information of a Salem/Hope Creek **AIRCRAFT** threat

Note 9: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:

Security events which do not represent a potential degradation in the level of safety of the plant are reported under 10 CFR 73.71 or in some cases under 10 CFR 50.72. Security events assessed as **HOSTILE ACTIONS** are classifiable under EAL HA4.1, EAL HS4.1 and EAL HG4.1.

A higher initial classification could be made based upon the nature and timing of the security threat and potential consequences. The Emergency Coordinator shall consider upgrading the emergency response status and emergency classification level in accordance with the Salem – Hope Creek Security Contingency Plan.

1st Condition (**SECURITY CONDITION**)

Reference is made to the specific security shift supervision (Security Operations Supervisor or designee) because these individuals are the designated personnel on-site qualified and trained to confirm that a security event is occurring or has occurred. Training on security event classification confirmation is closely controlled due to the strict secrecy controls placed on the Salem – Hope Creek Security Contingency Plan.

This threshold is based on the Salem – Hope Creek Security Contingency Plan. The Salem – Hope Creek Security Contingency Plan is based on guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Security Contingency Plan and ISFSI Program.

2nd Condition (**CREDIBLE / ACTUAL THREAT**)

This threshold is included to ensure that appropriate notifications for the security threat are made in a timely manner. This includes information of a credible threat. Only the site to which the specific threat is made needs declare the Notification of an UNUSUAL EVENT.

The determination of **CREDIBLE** is made through use of information found in Threat Assessment, SY-AA-101-132.

3rd Condition (**AIRCRAFT** threat)

The intent of this part of the EAL is to ensure that notifications for the **AIRCRAFT** threat are made in a timely manner and that offsite response organization (OROs) and plant personnel are at a state of heightened awareness regarding the credible threat. It is not the intent of this EAL to replace existing non-hostile related EALs involving **AIRCRAFT**.

This EAL is met when a plant (site) receives information regarding an **AIRCRAFT** threat from NRC. Validation is performed by calling the NRC or by other approved methods of authentication. Only the site to which the specific threat is made need declare the UNUSUAL EVENT.

The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an **AIRLINER** (**AIRLINER** is meant to be a large **AIRCRAFT** with the potential for causing significant damage to the plant). The status and size of the plane may be provided by NORAD through the NRC.

Escalation to ALERT emergency classification level would be via EAL HA4.1 and would be appropriate if the threat involves an **AIRLINER** within 30 minutes of the plant or a **HOSTILE ACTION** in the **OCA** or **PA**.

Explanation/Discussion/Definitions:

If the security events do not meet the threshold for an UNUSUAL EVENT classification, they may result in the need to make a non-emergency report per RAL Section 11.7.1.a, One Hour Non-Emergency Safeguards Event (10 CFR 73.71) as determined by Security per SY-AA-1002, “Safeguards Event Report.”

Security will be focused on actions to mitigate the security event and will provide the SM with key information as the event progresses. Communications between the SMs and the Security Team Leader should be accurate, concise, and focused on EAL criteria and protection of key target sets. As Security and Operations terminology sometimes differ, clarifying questions should be asked to ensure accurate information exchange.

1st Condition (SECURITY CONDITION)

Page 6 of this EAL Basis is a “Security Contingency Event Summary Table” that indicates which Security Contingency Events could result in Security Supervision determining that a **SECURITY CONDITION** exists and therefore an UNUSUAL EVENT classification should be made OR, could result in Security Supervision determining that a **HOSTILE ACTION** is or has occurred and therefore classification at the ALERT or higher level should be made based on the location (**OCA** or **PA**) of the **HOSTILE ACTION**.

2nd Condition (CREDIBLE / ACTUAL THREAT)

This threshold is included to ensure that threat information from any source which is assessed by security supervision as being a “**CREDIBLE/ACTUAL THREAT**” is classified as an UNUSUAL EVENT. Only the site to which the specific threat is made needs to declare the UNUSUAL EVENT. For Security Events, Salem and Hope Creek is considered a single site, therefore a “**CREDIBLE/ACTUAL THREAT**” to either Salem or Hope Creek would affect the entire site and a “Common Site” UE declaration would be made.

Timely classification will ensure that Offsite Response Organizations and plant personnel are notified in a timely manner resulting in a state of heightened awareness. Threats are evaluated by security per Threat Assessment, SY-AA-101-132. Security threats that do not meet the definition of a “**CREDIBLE/ACTUAL THREAT**” should be dispositioned IAW Threat Assessment, SY-AA-101-132.

3rd Condition (AIRCRAFT threat)

AIRCRAFT threat calls from the NRC should be **VALIDATED** by use of NRC authentication code or a return call to the NRC Headquarter Operations Center.

For security events, Salem and Hope Creek is considered a single site, therefore, a “**VALIDATED AIRCRAFT THREAT**” to either Salem or Hope Creek would affect the entire site and a “Common Site” UE declaration would be made.

Definitions:

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**.

VALIDATED: AIRCRAFT threat call from the NRC that is confirmed to be authentic. Calls from the NRC are **VALIDATED** by use of the NRC provided authentication code or by making a return call to the NRC Headquarter Operations Center and confirming threat information with the NRC Operation Officer. **AIRCRAFT** threat calls from other agencies, NORAD, FAA, or FBI should be **VALIDATED** by calling the NRC Operations Officer.

AIRCRAFT: Includes both small and large **AIRCRAFT**. Examples of **AIRCRAFT** include general aviation Cessna, Piper and Lear type private planes, large passenger or freight planes as well as police, medical and media helicopters. A large **AIRCRAFT** is referred to as an **AIRLINER**.

AIRLINER/LARGE AIRCRAFT: Any size or type of **AIRCRAFT** with the potential for causing significant damage to the plant (refer to the Security Contingency Plan for a more detailed definition).

CREDIBLE / ACTUAL THREAT: Is a threat which poses a likely and serious danger to the safe operation of the facility or to site personnel and public safety.

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the **OCA**).

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the purpose of emergency classification, the area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the **OCA**.

PROTECTED AREA (PA): A security controlled area within the **OWNER-CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security center.

PROJECTILE: An object that impacts Salem/Hope Creek that could cause concern for continued operability, reliability, or personnel safety.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HU4 Example EAL #1, #2, #3
2. Salem – Hope Creek Security Contingency Plan
3. SY-AA-101-132 Threat Assessment
4. HC.OP-AB.SEC-0001 Security Event
5. HC.OP-AB.SEC-0002 Airborne Threat

Security Contingency Event Summary Table

Note: Do not include titles of Security Contingency Event documents in future revisions

Contingency Event Number	Event Could Result in Determination of a SECURITY CONDITION (UE ONLY) Yes / No	Event Could Result in Determination of a HOSTILE ACTION (ALERT or Higher) Yes / No
# 1	Yes	Yes
# 2	Yes	Yes
# 3	Yes	No
# 4	No	Yes
# 5	Yes	Yes
# 6	No	No
# 7	No	No
# 8	Yes	Yes
# 9	Yes	Yes
# 10	Yes	Yes
# 11	Yes	No
# 12	Yes	No
# 13	Yes	No
# 14	Yes	No
# 15	Yes	No
# 16	Yes	Yes
# 17	Yes	Yes
# 18	No	Yes
# 19	Yes	Yes
# 20	Yes	No
# 21	Yes	No

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: **HOSTILE ACTION** within the **OWNER CONTROLLED AREA** or airborne attack threat

OPCON Applicability: All

EAL# & Classification Level: **HA4.1 – ALERT**

EAL:

A **HOSTILE ACTION** is occurring or has occurred within the **OCA** as reported by the Security Operations Supervisor or designee (Note 9)

OR

A **VALIDATED** notification from NRC of a **AIRLINER** attack threat < **30 minutes** away from Salem/Hope Creek (Note 9)

Note 9: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:

This EAL addresses the contingency for a very rapid progression of events, such as that experienced on September 11, 2001. They are not premised solely on the potential for a radiological release. Rather the issue includes the need for rapid assistance due to the possibility for significant and indeterminate damage from additional air, land or water attack elements.

The fact that the site is under serious attack or is an identified attack target with minimal time available for further preparation or additional assistance to arrive requires a heightened state of readiness and implementation of protective measures that can be effective (such as on-site evacuation, dispersal or sheltering).

1st Condition (**OCA HOSTILE ACTION**)

This EAL addresses the potential for a very rapid progression of events due to a **HOSTILE ACTION** within or directed towards the **OWNER CONTROLLED AREA (OCA)**. It is not intended to address incidents that are accidental events or acts of civil disobedience, such as small **AIRCRAFT** impact, hunters, or physical disputes between employees within the **OCA**. Those events are adequately addressed by other EALs or RALs.

Note that this EAL is applicable for any **HOSTILE ACTION** occurring, or that has occurred, in the **OWNER CONTROLLED AREA**.

If not previously notified by the NRC that the airborne **HOSTILE ACTION** was intentional, then it would be expected, although not certain, that notification by an appropriate Federal agency would follow. In this case, appropriate federal agency is intended to be NORAD, FBI, FAA or NRC. However, the declaration should not be unduly delayed awaiting Federal notification.

2nd Condition (**AIRLINER** threat)

This EAL addresses the immediacy of an expected threat (**AIRLINER**) arrival or impact on the site within a relatively short time (**< 30 minutes**).

The intent of this EAL is to ensure that notifications for the **AIRLINER** attack threat are made in a timely manner and that OROs and plant personnel are at a state of heightened awareness regarding the credible threat. **AIRLINER** is meant to be a large **AIRCRAFT** with the potential for causing significant damage to the site.

This EAL is met when a plant receives information regarding an **AIRLINER** attack threat from NRC and the **AIRLINER** is within **30 minutes** of the plant. Only the site to which the specific threat is made need declare the ALERT.

The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an **AIRLINER** (**AIRLINER** is meant to be a large **AIRCRAFT** with the potential for causing significant damage to the plant). The status and size of the plane may be provided by NORAD through the NRC.

Explanation/Discussion/Definitions:

This event will be escalated to a SITE AREA EMERGENCY based upon **HOSTILE ACTION** affecting the **PROTECTED AREA (PA)**. Also, if Salem declares an SAE due to their **PA** being affected by the security event, Hope Creek will escalate to SAE to match them.

1st Condition (**OCA HOSTILE ACTION**)

Reference is made to the specific security shift supervision (Security Operations Supervisor or designee) because these individuals are the designated personnel on-site qualified and trained to confirm that a **HOSTILE ACTION** is occurring or has occurred.

This EAL condition is not premised solely on adverse health effects caused by a radiological release. Rather the issue is the immediate need for assistance due to the nature of the event and the potential for significant and indeterminate damage. Although nuclear plant security officers are well trained and prepared to protect against **HOSTILE ACTION**, it is appropriate for Offsite Response Organizations (OROs) to be notified and encouraged to begin activation to be better prepared should it be necessary to consider further actions.

Page 6 of this EAL Basis is a “Security Contingency Event Summary Table” that indicates which Security Contingency Events could result in Security Supervision determining that a **HOSTILE ACTION** is or has occurred and therefore classification at the ALERT or higher level should be made based on the location (**OCA** or **PA**) of the **HOSTILE ACTION**. Security events that do not involve a **HOSTILE ACTION** may result in Security Supervision determining that a **SECURITY CONDITION** exists and therefore an UNUSUAL EVENT classification should be made per EAL HU4.1.

2nd Condition (**AIRLINER** threat)

The fact that the site is an identified attack candidate with minimal time available for further preparation requires a heightened state of readiness and implementation of protective measures that can be effective (onsite evacuation, dispersal, or sheltering) before arrival or impact.

This EAL is met when a plant receives **VALIDATED** information regarding an **AIRLINER** attack threat from NRC and the **AIRLINER** is less than **30 minutes** away from the site. Only the site (Salem and Hope Creek is considered a single site for Security event classifications) to which the specific threat is made needs declare the ALERT.

AIRLINER threat calls from the NRC should be **VALIDATED** by use of NRC authentication code or a return call to the NRC Headquarter Operations Center.

Definitions:

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. 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**).

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the purpose of emergency classification, area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the **OCA**.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROTECTED AREA (PA): A security controlled area within the **OWNER-CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security Center.

AIRCRAFT: Includes both small and large **AIRCRAFT**. Examples of **AIRCRAFT** include general aviation Cessna, Piper and Lear type private planes, large passenger or freight planes as well as police, medical and media helicopters. A large **AIRCRAFT** is referred to as an **AIRLINER**.

AIRLINER/LARGE AIRCRAFT: Any size or type of **AIRCRAFT** with the potential for causing significant damage to the plant (refer to the Security Contingency Plan for a more detailed definition).

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**.

PROJECTILE: An object directed toward Salem/Hope Creek that could cause concern for its continued operability, reliability, or personnel safety.

VALIDATED: AIRCRAFT threat call from the NRC that is confirmed to be authentic. Calls from the NRC are **VALIDATED** by use of the NRC provided authentication code or by making a return call to the NRC Headquarter Operations Center and confirming threat information with the NRC Operation Officer. **AIRCRAFT** threat calls from other agencies, NORAD, FAA, or FBI should be **VALIDATED** by calling the NRC Operations Officer.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HA4 Example EAL #1, #2
2. Salem – Hope Creek Security Contingency Plan
3. HC.OP-AB.SEC-0001 Security Event
4. HC.OP-AB.SEC-0002 Airborne Threat

Security Contingency Event Summary Table

Note: Do not include titles of Security Contingency Event documents in future revisions

Contingency Event Number	Event Could Result in Determination of a SECURITY CONDITION (UE ONLY) Yes / No	Event Could Result in Determination of a HOSTILE ACTION (ALERT or Higher) Yes / No
# 1	Yes	Yes
# 2	Yes	Yes
# 3	Yes	No
# 4	No	Yes
# 5	Yes	Yes
# 6	No	No
# 7	No	No
# 8	Yes	Yes
# 9	Yes	Yes
# 10	Yes	Yes
# 11	Yes	No
# 12	Yes	No
# 13	Yes	No
# 14	Yes	No
# 15	Yes	No
# 16	Yes	Yes
# 17	Yes	Yes
# 18	No	Yes
# 19	Yes	Yes
# 20	Yes	No
# 21	Yes	No

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: **HOSTILE ACTION** within the **PROTECTED AREA**

OPCON Applicability: All

EAL# & Classification Level: **HS4.1 – SITE AREA EMERGENCY**

EAL:

A **HOSTILE ACTION** is occurring or has occurred within the **PROTECTED AREA** as reported by the Security Operations Supervisor or designee (Note 9)

Note 9: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:

This condition represents an escalated threat to plant safety above that contained in the ALERT in that a **HOSTILE FORCE** has progressed from the **OWNER CONTROLLED AREA** to the **PROTECTED AREA**.

This EAL addresses the contingency for a very rapid progression of events due to a **HOSTILE ACTION** within or directed towards the **PROTECTED AREA (PA)**. Plant **VITAL AREAS** are within the **PROTECTED AREA** and are generally controlled by card key readers. A **HOSTILE ACTION** in the **PROTECTED AREA** (which includes **VITAL AREAS**) could represent a situation that threatens the safety of plant personnel and the general public.

These EALs address the contingency for a very rapid progression of events, such as that experienced on September 11, 2001. It is not premised solely on the potential for a radiological release. Rather the issue includes the need for rapid assistance due to the possibility for significant and indeterminate damage from additional air, land or water attack elements.

The fact that the site is under serious attack with minimal time available for further preparation or additional assistance to arrive requires Offsite Response Organization (ORO) readiness and preparation for the implementation of protective measures.

This EAL is not intended to address incidents that are accidental events or acts of civil disobedience, such as small **AIRCRAFT** impact, hunters, or physical disputes between employees within the **PROTECTED AREA**. Those events are adequately addressed by other EALs or RALs.

Although nuclear plant security officers are well trained and prepared to protect against **HOSTILE ACTION**, it is appropriate for OROs to be notified and encouraged to begin preparations for public protective actions to be better prepared should it be necessary to consider further actions.

If not previously notified by NRC that the airborne **HOSTILE ACTION** was intentional, then it would be expected, although not certain, that notification by an appropriate Federal agency would follow. In this case, appropriate federal agency is intended to be NORAD, FBI, FAA or NRC. However, the declaration should not be unduly delayed awaiting Federal notification.

Escalation of this emergency classification level to a GENERAL EMERGENCY, if appropriate, would be based upon the actual loss of physical control of the facility. If necessary, Salem will declare this event.

Explanation/Discussion/Definitions:

The Security Shift Supervision is defined as the Security Operations Supervisor or designee.

These individuals are the designated on-site personnel qualified and trained to confirm that a security event is occurring or has occurred. Training on security event classification confirmation is closely controlled due to the strict secrecy controls placed on the Salem – Hope Creek Security Contingency Plan (Safeguards) information.

PROJECTILES that are directed into or that have impacted the **PA** from the **OCA** or beyond are considered under this EAL as **HOSTILE ACTIONS** within the **PA**.

Page 5 of this EAL Basis is a “Security Contingency Event Summary Table” that indicates which Security Contingency Events could result in Security Supervision determining that a **HOSTILE ACTION** is or has occurred and therefore classification at the ALERT or higher level should be made based on the location (**OCA** or **PA**) of the **HOSTILE ACTION**. Security events that do not involve a **HOSTILE ACTION** may result in Security Supervision determining that a **SECURITY CONDITION** exists and therefore an UNUSUAL EVENT classification should be made per EAL HU4.1.

Definitions:

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the **OCA**).

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the purpose of emergency classification, area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the OCA.

HOSTILE FORCE: One or more 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.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROTECTED AREA (PA): A security controlled area within the **OWNER-CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security Center.

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**.

AIRCRAFT: Includes both small and large **AIRCRAFT**. Examples of **AIRCRAFT** include general aviation Cessna, Piper and Lear type private planes, large passenger or freight planes as well as police, medical and media helicopters. A large **AIRCRAFT** is referred to as an **AIRLINER**.

AIRLINER/LARGE AIRCRAFT: Any size or type of **AIRCRAFT** with the potential for causing significant damage to the plant (refer to the Security Contingency Plan for a more detailed definition).

PROJECTILE: An object that impacts Salem and/or Hope Creek that could cause concern for continued operability, reliability, or personnel safety.

VITAL AREAS: Typically any site specific areas, normally within the **PROTECTED AREA**, that contains equipment, systems, components, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HA4 Example EAL #1, #2
2. Salem – Hope Creek Security Contingency Plan
3. HC.OP-AB.SEC-0001 Security Event
4. HC.OP-AB.SEC-0002 Airborne Threat

Security Contingency Event Summary Table

Note: Do not include titles of Security Contingency Event documents in future revisions

Contingency Event Number	Event Could Result in Determination of a SECURITY CONDITION (UE ONLY) Yes / No	Event Could Result in Determination of a HOSTILE ACTION (ALERT or Higher) Yes / No
# 1	Yes	Yes
# 2	Yes	Yes
# 3	Yes	No
# 4	No	Yes
# 5	Yes	Yes
# 6	No	No
# 7	No	No
# 8	Yes	Yes
# 9	Yes	Yes
# 10	Yes	Yes
# 11	Yes	No
# 12	Yes	No
# 13	Yes	No
# 14	Yes	No
# 15	Yes	No
# 16	Yes	Yes
# 17	Yes	Yes
# 18	No	Yes
# 19	Yes	Yes
# 20	Yes	No
#21	Yes	No

This page intentionally blank

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: **HOSTILE ACTION** resulting in loss of physical control of the facility

OPCON Applicability: All

EAL# & Classification Level: **HG4.1 – GENERAL EMERGENCY**

EAL:

A **HOSTILE ACTION** has occurred such that plant personnel are unable to operate equipment required to maintain safety functions (i.e., reactivity control, RPV water level, or decay heat removal) at Salem or Hope Creek (Note 9)

OR

A **HOSTILE ACTION** has caused failure of Spent Fuel Cooling Systems and **IMMINENT** fuel damage is likely at Salem or Hope Creek (Note 9)

Note 9: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:1st Condition

This EAL encompasses conditions under which a **HOSTILE ACTION** has resulted in a loss of physical control of **VITAL AREAS** (containing vital equipment or controls of vital equipment) required to maintain safety functions and control of that equipment cannot be transferred to and operated from another location.

Typically, these safety functions are reactivity control (ability to shut down the reactor and keep it shutdown), reactor water level (ability to cool the core), and decay heat removal (ability to maintain a heat sink).

If control of the plant equipment necessary to maintain safety functions can be transferred to another location, then the threshold is not met.

2nd Condition

This EAL addresses failure of spent fuel cooling systems as a result of **HOSTILE ACTION** if **IMMINENT** fuel damage is likely.

Explanation/Discussion/Definitions:

Definitions:

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the **OCA**).

PROJECTILE: An object that impacts Salem and/or Hope Creek that could cause concern for continued operability, reliability, or personnel safety.

VITAL AREAS: Typically any site specific areas, normally within the **PROTECTED AREA**, that contains equipment, systems, components, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation.

PROTECTED AREA (PA): A security controlled area within the **OWNER-CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security Center.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the

purpose of emergency classification, area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the **OCA**.

IMMINENT: Mitigation actions have been ineffective, additional actions are not expected to be successful, and trended information indicates that the event or condition will. Where **IMMINENT** timeframes are specified, they shall apply.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HG1 Example EAL #1, #2
2. HC.OP-AB.SEC-0001 Security Event
3. HC.OP-AB.SEC-0002 Airborne Threat

This page intentionally blank

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: Confirmed **SECURITY CONDITION** or threat which indicates a potential degradation in the level of safety of the plant

Mode Applicability: All

EAL# & Classification Level: HU4.1 – UNUSUAL EVENT (Common Site)

EAL:

A **SECURITY CONDITION** that does NOT involve a **HOSTILE ACTION** as reported by the Security Operations Supervisor or designee (Note 8)

OR

Receipt of a **CREDIBLE/ACTUAL THREAT** to Salem or Hope Creek station – (determined by security in accordance with SY-AA-101-132, “Threat Assessment”) (Note 8)

OR

A **VALIDATED** notification from NRC providing information of a Salem/Hope Creek **AIRCRAFT** threat (Note 8)

Note 8: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:

Security events which do not represent a potential degradation in the level of safety of the plant are reported under 10 CFR 73.71 or in some cases under 10 CFR 50.72. Security events assessed as **HOSTILE ACTIONS** are classifiable under EAL HA4.1, EAL HS4.1 and EAL HG4.1.

A higher initial classification could be made based upon the nature and timing of the security threat and potential consequences. The Emergency Coordinator shall consider upgrading the emergency response status and emergency classification level in accordance with the Salem – Hope Creek Security Contingency Plan.

1st Condition (SECURITY CONDITION)

Reference is made to the specific security shift supervision (Security Operations Supervisor or designee) because these individuals are the designated personnel on-site qualified and trained to confirm that a security event is occurring or has occurred. Training on security event classification confirmation is closely controlled due to the strict secrecy controls placed on the Salem – Hope Creek Security Contingency Plan.

This threshold is based on the Salem – Hope Creek Security Contingency Plan. The Salem – Hope Creek Security Contingency Plan is based on guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Security Contingency Plan and **ISFSI** Program.

2nd Condition (CREDIBLE / ACTUAL THREAT)

This threshold is included to ensure that appropriate notifications for the security threat are made in a timely manner. This includes information of a credible threat. Only the site to which the specific threat is made needs declare the Notification of an UNUSUAL EVENT.

The determination of **CREDIBLE** is made through use of information found in Threat Assessment, SY-AA-101-132.

3rd Condition (AIRCRAFT Threat)

The intent of this part of the EAL is to ensure that notifications for the **AIRCRAFT** threat are made in a timely manner and that offsite response organization (OROs) and plant personnel are at a state of heightened awareness regarding the credible threat. It is not the intent of this EAL to replace existing non-hostile related EALs involving **AIRCRAFT**.

This EAL is met when a plant (site) receives information regarding an **AIRCRAFT** threat from NRC. Validation is performed by calling the NRC or by other approved methods of authentication. Only the site to which the specific threat is made need declare the UNUSUAL EVENT.

The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an **AIRLINER** (**AIRLINER** is meant to be a large **AIRCRAFT** with the potential for causing significant damage to the plant). The status and size of the plane may be provided by NORAD through the NRC.

Escalation to ALERT emergency classification level would be via EAL HA4.1 and would be appropriate if the threat involves an **AIRLINER** within 30 minutes of the plant or a **HOSTILE ACTION** in the **OCA** or **PA**.

Explanation/Discussion/Definitions:

If the security events do not meet the threshold for an UNUSUAL EVENT classification, they may result in the need to make a non-emergency report per RAL Section 11.7.1.a, One Hour Non-Emergency Safeguards Event (10 CFR 73.71) as determined by Security per SY-AA-1002, "Safeguards Event Report."

Security will be focused on actions to mitigate the security event and will provide the SM with key information as the event progresses. Communications between the SMs and the Security Team Leader should be accurate, concise, and focused on EAL criteria and protection of key target sets. As Security and Operations terminology sometimes differ, clarifying questions should be asked to ensure accurate information exchange.

1st Condition (**SECURITY CONDITION**)

Page 6 of this EAL Basis is a "Security Contingency Event Summary Table" that indicates which Security Contingency Events could result in Security Supervision determining that a **SECURITY CONDITION** exists and therefore an UNUSUAL EVENT classification should be made **OR**, could result in Security Supervision determining that a **HOSTILE ACTION** is or has occurred and therefore classification at the ALERT or higher level should be made based on the location (**OCA** or **PA**) of the **HOSTILE ACTION**.

2nd Condition (**CREDIBLE / ACTUAL THREAT**)

This threshold is included to ensure that threat information from any source which is assessed by security supervision as being a "**CREDIBLE/ACTUAL THREAT**" is classified as an UNUSUAL EVENT. Only the site to which the specific threat is made needs to declare the UNUSUAL EVENT. For Security Events, Salem and Hope Creek is considered a single site, therefore a "**CREDIBLE/ACTUAL THREAT**" to either Salem or Hope Creek would affect the entire site and a "Common Site" UE declaration would be made.

Timely classification will ensure that Offsite Response Organizations and plant personnel are notified in a timely manner resulting in a state of heightened awareness. Threats are evaluated by security per Threat Assessment, SY-AA-101-132. Security threats that do not meet the definition of a "**CREDIBLE/ACTUAL THREAT**" should be dispositioned IAW Threat Assessment, SY-AA-101-132.

3rd Condition (**AIRCRAFT** Threat)

AIRCRAFT threat calls from the NRC should be **VALIDATED** by use of NRC authentication code or a return call to the NRC Headquarter Operations Center.

For security events, Salem and Hope Creek is considered a single site, therefore, a “**VALIDATED AIRCRAFT THREAT**” to either Salem or Hope Creek would affect the entire site and a “Common Site” UE declaration would be made.

Definitions:

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**.

VALIDATED: AIRCRAFT threat call from the NRC that is confirmed to be authentic. Calls from the NRC are **VALIDATED** by use of the NRC provided authentication code or by making a return call to the NRC Headquarter Operations Center and confirming threat information with the NRC Operation Officer. **AIRCRAFT** threat calls from other agencies, NORAD, FAA, or FBI should be **VALIDATED** by calling the NRC Operations Officer.

AIRCRAFT: Includes both small and large **AIRCRAFT**. Examples of **AIRCRAFT** include general aviation Cessna, Piper and Lear type private planes, large passenger or freight planes as well as police, medical and media helicopters. A large **AIRCRAFT** is referred to as an **AIRLINER**.

AIRLINER/LARGE AIRCRAFT: Any size or type of **AIRCRAFT** with the potential for causing significant damage to the plant (refer to the Security Contingency Plan for a more detailed definition).

CREDIBLE / ACTUAL THREAT: Is a threat which poses a likely and serious danger to the safe operation of the facility or to site personnel and public safety.

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the **OCA**).

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the purpose of emergency classification, the area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the **OCA**.

PROTECTED AREA (PA): A security controlled area within the **OWNER CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security center.

PROJECTILE: An object that impacts Salem/Hope Creek that could cause concern for continued operability, reliability, or personnel safety.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HU4 Example EAL #1, #2, #3
2. Salem – Hope Creek Security Contingency Plan
3. SY-AA-101-132 Threat Assessment
4. SC.OP-AB.CR-0004(Q) – Security Event
5. SC.OP-AB.CR-0005(Q) – Airborne Threat

Security Contingency Event Summary Table

Note: Do not include titles of Security Contingency Event documents in future revisions

Contingency Event Number	Event Could Result in Determination of a SECURITY CONDITION (UE ONLY) Yes / No	Event Could Result in Determination of a HOSTILE ACTION (ALERT or Higher) Yes / No
# 1	Yes	Yes
# 2	Yes	Yes
# 3	Yes	No
# 4	No	Yes
# 5	Yes	Yes
# 6	No	No
# 7	No	No
# 8	Yes	Yes
# 9	Yes	Yes
# 10	Yes	Yes
# 11	Yes	No
# 12	Yes	No
# 13	Yes	No
# 14	Yes	No
# 15	Yes	No
# 16	Yes	Yes
# 17	Yes	Yes
# 18	No	Yes
# 19	Yes	Yes
# 20	Yes	No
# 21	Yes	No

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: **HOSTILE ACTION** within the **OWNER CONTROLLED AREA** or airborne attack threat

Mode Applicability: All

EAL# & Classification Level: **HA4.1 – ALERT**

EAL:

A **HOSTILE ACTION** is occurring or has occurred within the **OCA** as reported by the Security Operations Supervisor or designee (Note 8)

OR

A **VALIDATED** notification from NRC of a **AIRLINER** attack threat < **30 minutes** away from Salem/Hope Creek (Note 8)

Note 8: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:

This EAL addresses the contingency for a very rapid progression of events, such as that experienced on September 11, 2001. They are not premised solely on the potential for a radiological release. Rather the issue includes the need for rapid assistance due to the possibility for significant and indeterminate damage from additional air, land or water attack elements.

The fact that the site is under serious attack or is an identified attack target with minimal time available for further preparation or additional assistance to arrive requires a heightened state of readiness and implementation of protective measures that can be effective (such as on-site evacuation, dispersal or sheltering).

1st Condition (**OCA HOSTILE ACTION**)

This EAL addresses the potential for a very rapid progression of events due to a **HOSTILE ACTION** within or directed towards the **OWNER CONTROLLED AREA (OCA)**. It is not intended to address incidents that are accidental events or acts of civil disobedience, such as small **AIRCRAFT** impact, hunters, or physical disputes between employees within the **OCA**. Those events are adequately addressed by other EALs or RALs

Note that this EAL is applicable for any **HOSTILE ACTION** occurring, or that has occurred, in the **OWNER CONTROLLED AREA**.

If not previously notified by the NRC that the airborne **HOSTILE ACTION** was intentional, then it would be expected, although not certain, that notification by an appropriate Federal agency would follow. In this case, appropriate federal agency is intended to be NORAD, FBI, FAA or NRC. However, the declaration should not be unduly delayed awaiting Federal notification.

2nd Condition (**AIRLINER Threat**)

This EAL addresses the immediacy of an expected threat (**AIRLINER**) arrival or impact on the site within a relatively short time (**< 30 minutes**).

The intent of this EAL is to ensure that notifications for the **AIRLINER** attack threat are made in a timely manner and that OROs and plant personnel are at a state of heightened awareness regarding the credible threat. **AIRLINER** is meant to be a large **AIRCRAFT** with the potential for causing significant damage to the site.

This EAL is met when a plant receives information regarding an **AIRLINER** attack threat from NRC and the **AIRLINER** is within **30 minutes** of the plant. Only the site to which the specific threat is made need declare the ALERT.

The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an **AIRLINER** (**AIRLINER** is meant to be a large **AIRCRAFT** with the potential for causing significant damage to the plant). The status and size of the plane may be provided by NORAD through the NRC.

Explanation/Discussion/Definitions:

This event will be escalated to a SITE AREA EMERGENCY based upon **HOSTILE ACTION** affecting the **PROTECTED AREA (PA)**. Also, if Hope Creek declares an SAE due to their **PA** being affected by the security event, Salem will escalate to SAE to match them.

1st Condition (OCA HOSTILE ACTION)

Reference is made to the specific security shift supervision (Security Operations Supervisor or designee) because these individuals are the designated personnel on-site qualified and trained to confirm that a **HOSTILE ACTION** is occurring or has occurred.

This EAL condition is not premised solely on adverse health effects caused by a radiological release. Rather the issue is the immediate need for assistance due to the nature of the event and the potential for significant and indeterminate damage. Although nuclear plant security officers are well trained and prepared to protect against **HOSTILE ACTION**, it is appropriate for Offsite Response Organizations (OROs) to be notified and encouraged to begin activation to be better prepared should it be necessary to consider further actions.

Page 6 of this EAL Basis is a “Security Contingency Event Summary Table” that indicates which Security Contingency Events could result in Security Supervision determining that a **HOSTILE ACTION** is or has occurred and therefore classification at the ALERT or higher level should be made based on the location (**OCA** or **PA**) of the **HOSTILE ACTION**. Security events that do not involve a **HOSTILE ACTION** may result in Security Supervision determining that a **SECURITY CONDITION** exists and therefore an UNUSUAL EVENT classification should be made per EAL HU4.1.

2nd Condition (AIRLINER Threat)

The fact that the site is an identified attack candidate with minimal time available for further preparation requires a heightened state of readiness and implementation of protective measures that can be effective (onsite evacuation, dispersal, or sheltering) before arrival or impact.

This EAL is met when a plant receives **VALIDATED** information regarding an **AIRLINER** attack threat from NRC and the **AIRLINER** is less than **30 minutes** away from the site. Only the site (Salem and Hope Creek is considered a single site for Security event classifications) to which the specific threat is made needs declare the ALERT.

AIRLINER threat calls from the NRC should be **VALIDATED** by use of NRC authentication code or a return call to the NRC Headquarter Operations Center.

Definitions:

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. 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**).

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the purpose of emergency classification, area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the **OCA**.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROTECTED AREA (PA): A security controlled area within the **OWNER CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security Center.

AIRCRAFT: Includes both small and large **AIRCRAFT**. Examples of **AIRCRAFT** include general aviation Cessna, Piper and Lear type private planes, large passenger or freight planes as well as police, medical and media helicopters. A large **AIRCRAFT** is referred to as an **AIRLINER**.

AIRLINER/LARGE AIRCRAFT: Any size or type of **AIRCRAFT** with the potential for causing significant damage to the plant (refer to the Security Contingency Plan for a more detailed definition).

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**.

PROJECTILE: An object directed toward Salem/Hope Creek that could cause concern for its continued operability, reliability, or personnel safety.

VALIDATED: AIRCRAFT threat call from the NRC that is confirmed to be authentic. Calls from the NRC are **VALIDATED** by use of the NRC provided authentication code or by making a return call to the NRC Headquarter Operations Center and confirming threat information with the NRC Operation Officer. **AIRCRAFT** threat calls from other agencies, NORAD, FAA, or FBI should be **VALIDATED** by calling the NRC Operations Officer.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HA4 Example EAL #1, #2
2. Salem – Hope Creek Security Contingency Plan
3. SC.OP-AB.CR-0004(Q) – Security Event
4. SC.OP-AB.CR-0005(Q) – Airborne Threat

Security Contingency Event Summary Table

Note: Do not include titles of Security Contingency Event documents in future revisions

Contingency Event Number	Event Could Result in Determination of a SECURITY CONDITION (UE ONLY) Yes / No	Event Could Result in Determination of a HOSTILE ACTION (ALERT or Higher) Yes / No
# 1	Yes	Yes
# 2	Yes	Yes
# 3	Yes	No
# 4	No	Yes
# 5	Yes	Yes
# 6	No	No
# 7	No	No
# 8	Yes	Yes
# 9	Yes	Yes
# 10	Yes	Yes
# 11	Yes	No
# 12	Yes	No
# 13	Yes	No
# 14	Yes	No
# 15	Yes	No
# 16	Yes	Yes
# 17	Yes	Yes
# 18	No	Yes
# 19	Yes	Yes
# 20	Yes	No
# 21	Yes	No

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: **HOSTILE ACTION** within the **PROTECTED AREA**

Mode Applicability: All

EAL# & Classification Level: **HS4.1 – SITE AREA EMERGENCY**

EAL:

A **HOSTILE ACTION** is occurring or has occurred within the **PROTECTED AREA** as reported by the Security Operations Supervisor or designee (Note 8)

Note 8: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:

This condition represents an escalated threat to plant safety above that contained in the ALERT in that a **HOSTILE FORCE** has progressed from the **OWNER CONTROLLED AREA** to the **PROTECTED AREA**.

This EAL addresses the contingency for a very rapid progression of events due to a **HOSTILE ACTION** within or directed towards the **PROTECTED AREA (PA)**. Plant **VITAL AREAS** are within the **PROTECTED AREA** and are generally controlled by card key readers. A **HOSTILE ACTION** in the **PROTECTED AREA** (which includes **VITAL AREAS**) could represent a situation that threatens the safety of plant personnel and the general public.

These EALs address the contingency for a very rapid progression of events, such as that experienced on September 11, 2001. It is not premised solely on the potential for a radiological release. Rather the issue includes the need for rapid assistance due to the possibility for significant and indeterminate damage from additional air, land or water attack elements.

The fact that the site is under serious attack with minimal time available for further preparation or additional assistance to arrive requires Offsite Response Organization (ORO) readiness and preparation for the implementation of protective measures.

This EAL is not intended to address incidents that are accidental events or acts of civil disobedience, such as small **AIRCRAFT** impact, hunters, or physical disputes between employees within the **PROTECTED AREA**. Those events are adequately addressed by other EALs or RALs.

Although nuclear plant security officers are well trained and prepared to protect against **HOSTILE ACTION**, it is appropriate for OROs to be notified and encouraged to begin preparations for public protective actions to be better prepared should it be necessary to consider further actions.

If not previously notified by NRC that the airborne **HOSTILE ACTION** was intentional, then it would be expected, although not certain, that notification by an appropriate Federal agency would follow. In this case, appropriate federal agency is intended to be NORAD, FBI, FAA or NRC. However, the declaration should not be unduly delayed awaiting Federal notification.

Escalation of this emergency classification level to a GENERAL EMERGENCY, if appropriate, would be based upon the actual loss of physical control of the facility. If necessary, Salem will declare this event.

Explanation/Discussion/Definitions:

The Security Shift Supervision is defined as the Security Operations Supervisor or designee.

These individuals are the designated on-site personnel qualified and trained to confirm that a security event is occurring or has occurred. Training on security event classification confirmation is closely controlled due to the strict secrecy controls placed on the Salem – Hope Creek Security Contingency Plan (Safeguards) information.

PROJECTILES that are directed into or that have impacted the **PA** from the **OCA** or beyond are considered under this EAL as **HOSTILE ACTIONS** within the **PA**.

Page 5 of this EAL Basis is a “Security Contingency Event Summary Table” that indicates which Security Contingency Events could result in Security Supervision determining that a **HOSTILE ACTION** is or has occurred and therefore classification at the ALERT or higher level should be made based on the location (**OCA** or **PA**) of the **HOSTILE ACTION**. Security events that do not involve a **HOSTILE ACTION** may result in Security Supervision determining that a **SECURITY CONDITION** exists and therefore an UNUSUAL EVENT classification should be made per EAL HU4.1.

Definitions:

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the **OCA**).

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the purpose of emergency classification, area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the **OCA**.

HOSTILE FORCE: One or more 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.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

PROTECTED AREA (PA): A security controlled area within the **OWNER CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security Center.

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**.

AIRCRAFT: Includes both small and large **AIRCRAFT**. Examples of **AIRCRAFT** include general aviation Cessna, Piper and Lear type private planes, large passenger or freight planes as well as police, medical and media helicopters. A large **AIRCRAFT** is referred to as an **AIRLINER**.

AIRLINER/LARGE AIRCRAFT: Any size or type of **AIRCRAFT** with the potential for causing significant damage to the plant (refer to the Security Contingency Plan for a more detailed definition).

PROJECTILE: An object that impacts Salem and/or Hope Creek that could cause concern for continued operability, reliability, or personnel safety.

VITAL AREAS: Typically any site specific areas, normally within the **PROTECTED AREA**, that contains equipment, systems, components, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HA4 Example EAL #1, #2
2. Salem – Hope Creek Security Contingency Plan
3. SC.OP-AB.CR-0004(Q) – Security Event
4. SC.OP-AB.CR-0005(Q) – Airborne Threat

Security Contingency Event Summary Table

Note: Do not include titles of Security Contingency Event documents in future revisions

Contingency Event Number	Event Could Result in Determination of a SECURITY CONDITION (UE ONLY) Yes / No	Event Could Result in Determination of a HOSTILE ACTION (ALERT or Higher) Yes / No
# 1	Yes	Yes
# 2	Yes	Yes
# 3	Yes	No
# 4	No	Yes
# 5	Yes	Yes
# 6	No	No
# 7	No	No
# 8	Yes	Yes
# 9	Yes	Yes
# 10	Yes	Yes
# 11	Yes	No
# 12	Yes	No
# 13	Yes	No
# 14	Yes	No
# 15	Yes	No
# 16	Yes	Yes
# 17	Yes	Yes
# 18	No	Yes
# 19	Yes	Yes
# 20	Yes	No
# 21	Yes	No

This page intentionally blank

EAL Category: H – Hazards & Other Conditions Affecting Plant Safety

EAL Subcategory: 4 – Security

Initiating Condition: **HOSTILE ACTION** resulting in loss of physical control of the facility

Mode Applicability: All

EAL# & Classification Level: **HG4.1 – GENERAL EMERGENCY**

EAL:

A **HOSTILE ACTION** has occurred such that plant personnel are unable to operate equipment required to maintain safety functions (i.e., reactivity control, RCS inventory, or secondary heat removal) at Salem or Hope Creek (Note 8)

OR

A **HOSTILE ACTION** has caused failure of Spent Fuel Cooling Systems and **IMMINENT** fuel damage is likely at Salem or Hope Creek (Note 8)

Note 8: Shift Manager (SM) should implement the Prompt Actions of the Security Emergency Guideline Attachment located in NC.EP-EP.ZZ-0102, EC Response, prior to classification of a security emergency.

Key Information to obtain from Security Supervision upon SM notification of a security event:

- Determination if the security event is a **HOSTILE ACTION** or **SECURITY CONDITION**
- If a **HOSTILE ACTION**, is location the **OCA** or **PA**?

Basis:**1st Condition**

This EAL encompasses conditions under which a **HOSTILE ACTION** has resulted in a loss of physical control of **VITAL AREAS** (containing vital equipment or controls of vital equipment) required to maintain safety functions and control of that equipment cannot be transferred to and operated from another location.

Typically, these safety functions are reactivity control (ability to shut down the reactor and keep it shutdown), RCS inventory (ability to cool the core), and secondary heat removal (ability to remove decay heat).

If control of the plant equipment necessary to maintain safety functions can be transferred to another location, then the threshold is not met.

2nd Condition

This EAL addresses failure of spent fuel cooling systems as a result of **HOSTILE ACTION** if **IMMINENT** fuel damage is likely.

Explanation/Discussion/Definitions:

Definitions:

HOSTILE ACTION: An act toward Salem or Hope Creek 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 Salem or Hope Creek. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the **OCA**).

PROJECTILE: An object that impacts Salem and/or Hope Creek that could cause concern for continued operability, reliability, or personnel safety.

VITAL AREAS: Typically any site specific areas, normally within the **PROTECTED AREA**, that contains equipment, systems, components, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation.

PROTECTED AREA (PA): A security controlled area within the **OWNER CONTROLLED AREA (OCA)** that is enclosed by the security perimeter fence and monitored by intrusion detection systems. Access to the **PA** requires proper security clearance and is controlled at the Security Center.

HOSTAGE: A person(s) held as leverage against the station to ensure that demands will be met by the station.

OWNER CONTROLLED AREA (OCA): Property owned, maintained and controlled by PSEG Nuclear as part of the Salem & Hope Creek Generating Station complex. For the

purpose of emergency classification, area from the PSEG Nuclear access road checkpoint and inward towards the stations is considered the **OCA**.

IMMINENT: Mitigation actions have been ineffective, additional actions are not expected to be successful, and trended information indicates that the event or condition will occur. Where **IMMINENT** timeframes are specified, they shall apply.

EAL Basis Reference(s):

1. NEI 99-01, Rev. 05, HG1 Example EAL #1, #2
2. SC.OP-AB.CR-0004(Q) – Security Event
3. SC.OP-AB.CR-0005(Q) – Airborne Threat

This page intentionally blank