

UNCONTROLLED

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

PLANT PROCEDURES MANUAL

WNP- 2

UNCONTROLLED

PROCEDURE NUMBER ★ 13.1.1	APPROVED <i>J. Martin</i>	DATE 03/11/83
VOLUME NAME 13	EMERGENCY PLAN IMPLEMENTING PROCEDURES	
SECTION 13.1	EMERGENCY CLASSIFICATION	
TITLE ★ 13.1.1	CLASSIFYING THE EMERGENCY	

13.1.1.1 PURPOSE

The purpose of this procedure is to provide the Shift Manager, Plant Emergency Director, and plant operations personnel with the necessary information and a methodology to guide them in properly identifying and classifying an emergency situation. Refer to Attachment D, "Bases for the Classification Methodology," for a discussion of the strategy used in the development of this procedure, the general descriptions for each classification of emergency, and other background information.

CAUTION: This procedure is only a guide to emergency classification. The final consideration in all classifications is one of judgment on the part of the Plant Emergency Director.

13.1.1.2 REFERENCES

WNP-1, 2 Emergency Preparedness Plan
NUREG-0654, FEMA-REP-1, Rev. 1
WNP-2 Technical Specifications

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ResponsibilityAction

Plant Emergency Director

- .1 Maintain the sole responsibility for timely classification and declaration of any WNP-2 emergency situation. Utilize guidance specified in this procedure and attachments, professional judgment, and the recommendations of the Operations Manager, Shift Manager, Control Room Supervisor, and Shift Technical Advisor.
 - a. Refer to Attachment A, "Guidance for Classifying Emergencies," for a listing of symptomatic initiating conditions and situation based initiating conditions.
 - b. Refer to Attachment B, "Symptomatic Initiating Conditions Summary," for a quick reference listing of symptomatic initiating conditions.
 - c. Refer to Attachment C, "Situation Based Guidelines Summary," for a summary listing of situation based initiating conditions to be used in classifying abnormal events.
 - d. Refer to Attachment D, "Bases for the Classification Methodology," for background information used to develop this procedure.

ResponsibilityAction

Plant Emergency Director
(contd.)

- e. Refer to EPIP 13.1.2, "Plant Emergency Director's Instructions," for actions and responsibilities necessary after an emergency has been classified.

Operations Manager

- .2 Function as the Plant Emergency Director until relieved by the Plant Manager or Assistant Plant Manager.

Shift Manager

- .3 Function as the Plant Emergency Director until relieved by the Operations Manager, Assistant Plant Manager, or Plant Manager.
- .4 Maintain primary responsibility for monitoring the status of plant parameters and other initiating conditions upon which emergency classification depends.
- .5 Recommend an appropriate emergency classification to the Plant Emergency Director or Operations Manager for any observed WNP-2 emergency condition. Utilize guidance specified in this procedure and attachments, professional judgment, and the recommendations of the Control Room Supervisor, Shift Technical Advisor, and Reactor Operators.

ResponsibilityAction

Control Room Supervisor,
Shift Technical Advisor,
Reactor Operators

- .6 Monitor the status of plant parameters and other initiating conditions upon which the emergency classification depends, and inform the Shift Manager if any parameter approaches or exceeds emergency action levels specified in attachments. Refer to Attachment A, "Guidance for Classifying Emergencies."

Control Room Supervisor,
Shift Technical Advisor

- .7 Recommend an emergency classification to the Shift Manager and/or Plant Emergency Director based upon plant conditions and the guidance specified in the attachments to this procedure.

13.1.1.4

ATTACHMENTS

- A. Guidance for Classifying Emergencies
- B. Symptomatic Initiating Conditions Summary
- C. Situation Based Guidelines Summary
- D. Bases for the Classification Methodology

ATTACHMENT A
GUIDANCE FOR CLASSIFYING EMERGENCIES

INTRODUCTION

Emergency classification is the final responsibility of the Plant Emergency Director based on the recommendations of technical and operations staff. These inputs may come from the Control Room, Technical Support Center, or Emergency Operations Facility. The most likely mechanism is for the Shift Manager to make recommendations based on plant parameters or initial dose assessments. Initially, however, during back-shifts, the Shift Manager will also function as the Plant Emergency Director, and recommendations will come to him from the operating crew.

The situation based and symptomatic initiating conditions (Emergency Action Levels) for each class of emergency are as follows: (Refer to Attachment D, "Bases for the Classification Methodology," for an explanation of the bases of all initiating conditions.)

CAUTION: This procedure is only a guide. Proper judgment based on a "safety first" principle must be used as the final consideration for all classifications.

A. Unusual Event (See EPIP 13.1.2 for Actions.)

If any of the following conditions exist, consider declaring an Unusual Event.

1. Symptomatic Initiating Conditions (Unusual Event)
 - a. Lo Lo reactor vessel water level (-50 inches).
 - b. Reactor pressure greater than or equal to 1148 psig.

- c. Drywell pressure greater than or equal to 1.89 psig.
- d. Drywell pressure less than or equal to -2 psig for a period of one hour or more.
- e. Drywell floor and equipment drain sump flow greater than or equal to 36,000 gallons in any 24-hour period.
- f. Drywell floor drain sump flow rate greater than or equal to 5 gpm.
- g. Drywell temperature greater than or equal to 135°F for a period of eight hours or more.
- h. Suppression Pool water temperature greater than or equal to 110°F with reactor power greater than or equal to one percent.
- i. Suppression Pool level greater than or equal to +2 inches or less than or equal to -2 inches for a period of one hour or more.

2. Situation Based Initiating Conditions (Unusual Event)

- a. Any plant condition requiring plant shutdown as a result of exceeding the limiting conditions for operation and associated action items, (as defined in the WNP-2 Technical Specifications) and is of immediate safety concern or where other than a normal controlled shutdown takes place. Examples of this condition include, but are not limited to, the following:

(1) A stuck-open main steam relief valve.

(2) Loss of fire protection systems that threaten the normal level of plant safety.

(3) Release of radioactive material in liquid, gaseous, or particulate form in excess of Technical Specification limits as verified by sample analysis.

b. Natural phenomena and other hazards at or near the site that threaten the normal level of safety of the plant. Examples of such hazards include, but are not limited to, the following:

(1) Floods (River Pumphouse in danger of inundation).

(2) Earthquakes (any earthquake detected by the seismic instrumentation).

(3) Tornadoes (actual sighting offsite within the exclusion area).

(4) Aircraft crash or train derailment on site but not affecting safety-related equipment.

(5) Explosions on site, but not affecting plant operation.

(6) Toxic or flammable gas releases near or on site.

(7) Visible ash fallout from volcanic activity.

(8) High winds, sustained above 80 mph.

c. Any plant condition at or near the plant that warrants increased awareness on the part of plant personnel. Examples of this condition include, but are not limited to, the following:

- (1) Transportation of a contaminated injured individual from the plant to an offsite hospital.
- (2) Loss of all offsite power.
- (3) A fire requiring activation of the Plant Emergency Team (fire brigade).
- (4) Reactor scram initiated, all rods not full in, but reactor is subcritical.
- (5) A breach of security, such as attempted sabotage.
- (6) An area radiation alarm HI and an increasing or sustained high level confirmed by direct measurement.

B. Alert (See EPIP 13.1.2 for Actions.)

If any of the following initiating conditions exist, consider declaring an Alert.

1. Symptomatic Initiating Conditions (Alert)

- a. Power range monitoring system detects reactor power at greater than or equal to five percent, ten or more seconds after a scram.
- b. Reactor water level less than or equal to -129 inches.

- c. Main steam isolation valve closure logic met; both inboard and outboard valves on one or more lines fail to close.
- d. Containment isolation logic met, but both inboard and outboard valves on one or more Reactor Coolant Pressure Boundary (RCPB) lines fail to close.
- e. Reactor pressure greater than or equal to 1250 psig.
- f. Elevated release activity greater than or equal to (later).

2. Situation Based Initiating Conditions (Alert)

- a. A condition where a safety system instrument has failed to initiate an automatic protective action such that the safety limits could be exceeded. Examples of this type of situation include, but are not limited to, the following:
 - (1) Total loss of reactor vessel water level indication.
- b. Natural phenomena and other hazards that represent a substantial degradation in the level of plant safety or warrant the use of additional personnel for accident assessment and in-plant response. Examples of such hazards include, but are not limited to, the following:
 - (1) Flooding or potential flooding that directly affects plant safety systems.
 - (2) Sustained wind speeds in excess of 100 mph.
 - (3) Severe electrical storms that cause major failure of safety-related instruments.

- (4) A tornado within the protected area boundary, and compromising safety-related equipment.
- (5) An aircraft crash or train derailment compromising safety-related equipment.
- (6) An explosion causing plant damage that affects the operation of safety systems.
- (7) Entry of toxic or flammable gas into plant facilities.
- (8) Volcanic ash fallout severe enough to warrant plant shutdown.
- (9) Control Room evacuation.
- (10) A fire affecting a safety system.

c. Situations where a release of radioactive material warrants offsite response or personnel to perform offsite monitoring, but does not require any protective actions. Examples include the following:

- (1) Measured or projected offsite whole body dose rates greater than or equal to 0.5 mR/hr or 2.5 mRem/hr thyroid.
- (2) Standby Service Water System high radiation level and inability to isolate.

C. Site Area Emergency (See EPIP 13.1.2 for Actions.)

If any of the following initiating conditions exist, consider declaring a Site Area Emergency.

1. Symptomatic Initiating Conditions (Site Area Emergency)

- a. Reactor pressure greater than or equal to 1325 psig.
- b. Drywell temperature greater than or equal to 340°F.
- c. Primary containment integrity threatened based on exceeding the following limits from the Emergency Procedures (PPM 5.0 series):
 - 1) Heat Capacity Temperature Limit (HCTL)
 - 2) Suppression Pool Load Limit (SPLL)
 - 3) Pressure Suppression Pressure Limit (PSPL)
 - 4) Heat Capacity Level Limit (HCLL)
 - 5) Primary Containment Pressure Limit (PCPL)
 - 6) Drywell Spray Initiation Pressure Limit (DSIPL)
- d. Elevated release activity greater than (to be determined).
- e. Reactor power greater than five percent and Suppression Pool temperature greater than 110°F and a safety relief valve open or drywell pressure greater than 1.69 psig.

2. Situation Based Initiating Conditions (Site Area Emergency)

- a. Conditions where the Safety Limits and associated action requirements have been violated. Examples include the following:
 - (1) Significant failed fuel, as verified by reactor coolant sample analysis.
 - (2) Failure of the ECCS systems and other water sources to adequately keep the core covered above 2/3 core height.
- b. Situations where the level of safety has, or could be, degraded to the point of losing a plant function needed to protect the public. Examples include, but are not limited to, the following:
 - (1) Failure of the Standby Gas Treatment System to function when needed.
 - (2) Failure of fuel cladding (same as item C.2.a above).
 - (3) Failure or potential failure of the primary containment in such a way that would allow significant leakage.
- c. Any plant condition that threatens the safety of the plant and warrants the activation of the Technical Support Center, Operations Support Center, and Emergency Operations Facility for the purpose of accident assessment, in-plant response, and offsite response. Examples include, but are not limited to, the following:
 - (1) Fire affecting safety systems to the point of inadequate control of the plant.

- (2) Elevated hydrogen levels inside containment, coupled with oxygen concentrations sufficient to cause a potentially harmful pressure spike should the two gases ignite (this requires engineering analysis, refer to PPM later).
 - (3) An earthquake greater than the safe shutdown earthquake as indicated on the seismic monitoring system.
 - (4) Any natural or man-made event that jeopardizes the plant safety systems to the point of inadequate control of the plant.
 - (5) Failure of secondary containment isolation when required.
 - (6) Fuel Pool level below bottom of fuel transfer gate and decreasing (assumes spent fuel in the pool).
- d. A situation where significant release of radioactive material has or could take place. Examples include the following:
- (1) Measured or projected offsite dose rates greater than or equal to 50 mR/hr whole body or 250 mRem/hr to the thyroid.

D. General Emergency (See EPIP 13.1.2 for Actions.)

If any of the following initiating conditions exist, consider declaring a General Emergency.

1. Parametric Initiating Conditions (General Emergency)

- a. Effluent release activity greater than (to be determined).

2. Situation Based Initiating Conditions (General Emergency)

- a. Loss of, or high potential for loss of, primary containment and known core damage. Emergency Operating Procedures (PPM Volume 5) should be used as guidance in determining these conditions.
- b. Any major event that could cause a degradation of plant safety such that the release of large amounts of radioactive material in a short period of time is possible. Examples include the following:
 - (1) Measured or projected offsite doses greater than or equal to one rem whole body or five times this level to the thyroid.
- c. Any condition that warrants the activation of the Technical Support Center, the Operations Support Center, and the Emergency Operations Facility for accident assessment, in-plant response, and offsite emergency response to aid in the implementation of protective actions.

NOTE: A summary of symptomatic and situation based initiating conditions can be found in Attachments B and C, respectively.

ATTACHMENT B
SYMPTOMATIC INITIATING CONDITIONS SUMMARY

UNUSUAL EVENT

- o Rx Water Level LE -50 in
- o Rx Press GE 1148 psig
- o DW Press GE 1.89 psig
- o DW Floor Drain Sump Flow GE 5 gpm
- o Total DW Sump Flow GE 36,000 gal/24 hrs
- o DW Press LE -2 psig for 1 hr
- o DW Temp GE 135°F for 8 hr
- o Supp Pool Temp GE 110°F and Pwr GE 1%
- o Supp Pool Water Lvl GE +2 in for 1 hr
- o Supp Pool Water Lvl LE -2 in for 1 hr

ALERT

- o APRM GE 5%, 10 sec. after scram
- o Rx Water Level LE -129 in
- o MSIV Closure Logic met, but valves fail to close
- o Containment Isolation Logic met, but valves fail to close
- o Rx Pressure GE 1250 psig
- o Elevated release GE (later)

SITE AREA EMERGENCY

- o Rx Press GE 1325 psig
- o DW Temp GE 340°F
- o Elevated Release GE (to be determined)
- o Rx Pwr GE 5% and Supp Pool Temp GT 110°F and a SRV open or DW Press GT 1.69 psig
- o HCTL Exceeded
- o SPLL Exceeded
- o PSPL Exceeded
- o HCLL Exceeded
- o PCPL Exceeded
- o DSIPL Exceeded

GENERAL EMERGENCY

- o Elevated Release GE (later)

NOTE: GE = Greater than or equal to.
LE = Less than or equal to.
GT = Greater than.

ATTACHMENT C
SITUATION BASED GUIDELINES SUMMARY

I. UNUSUAL EVENT

1. A condition that exceeds the Limiting Condition of Operation (LCO) and associated action requirements and is of immediate safety concern.
2. Situation threatens normal level of plant safety.
3. Situation warrants increased awareness on the part of plant personnel.

II. ALERT

1. A condition where a safety system instrument has failed to initiate automatic protective actions such that the design basis Safety Limits could be exceeded.
2. A situation which does or could represent a substantial degradation in the level of plant safety.
3. A situation which warrants the use of additional personnel for accident assessment and in-plant response.
4. A situation where a release of radioactive material warrants offsite response or monitoring, but does not require protective actions.

III. SITE AREA EMERGENCY

1. A condition where the Safety Limits and associated action requirements have been violated.
2. A situation where the level of safety has or could be degraded to the point of losing a plant function needed to protect the public (failed fuel or failed primary containment).
3. A condition that warrants use of additional personnel for accident assessment, in-plant response, and offsite emergency response.
4. A situation where a significant release of radioactive material has or could take place.

IV. GENERAL EMERGENCY

1. Substantial core damage and loss of, or high potential for loss of, primary containment.
2. Large amounts of radioactive material has or could be released in a short period of time.
3. A condition that warrants use of additional personnel for accident assessment, in-plant response, and offsite emergency response to aid in the implementation of protective actions.

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ATTACHMENT D
BASES FOR THE CLASSIFICATION METHODOLOGY

I. DISCUSSION

This procedure is based on the guidance provided in NUREG-0654, FEMA-REP-1, Rev. 1, and, where possible, uses the same symptomatic approach as the Plant Emergency Operating Procedures.

Using enhanced definitions of the various emergency classifications from NUREG-0654, Appendix 1, and the safety parameter groups from NUREG-0696, Section 5, a classification scheme has been developed that contains a dual methodology such that all abnormal conditions, even those beyond the design basis of the plant, will be accommodated.

Emergency classification is arrived at by two methods. The first method is by the use of predetermined safety parameters and their status. These are called symptomatic initiating conditions, and if any one of these parameters is in an unsafe condition, then the appropriate emergency classification is defined. To aid the operator in the implementation of this procedure, the symptomatic initiating conditions have been computerized. When a symptomatic initiating condition has been exceeded, the Graphic Display System (GDS) will display the appropriate emergency classification and the basis for that classification. If the GDS is not operational, Attachments B and C make useful quick reference guides.

Since it is virtually impossible to predefine a symptomatic initiating condition for every conceivable abnormal situation, a second method was developed to accommodate those plant conditions which cannot be quantitatively defined. The second method of determining emergency classification is by the use of a set of discretionary guidelines. Unlike the symptomatic conditions, which are distinct, usually singular, quantitative parameters, the situation based initiating conditions represent multiple input situations that are qualitative in nature and thus require more judgment in the classification process.

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II. CLASSIFICATION

A. Unusual Event

1. Definition

An event at the plant or its surroundings where the level of safety has or could be degraded to the point of exceeding a limiting condition for operation (including associated action requirements), as defined in the WNP-2 Technical Specifications, and is of immediate safety concern. It is also an event where increased awareness on the part of plant operating personnel is warranted.

2. Purpose

To bring the operating staff to a state of readiness and provide systematic handling of information and decisionmaking.

B. Alert

1. Definition

A condition at the plant or its surroundings where the level of safety has or could be substantially degraded, such as the failure of safety system instrument settings which initiate automatic protective actions that preclude exceeding the design basis Safety Limits. It is also a condition where a small release of radioactive material warrants offsite response and/or monitoring, but does not require protective actions, or where the use of additional personnel for accident assessment and in-plant response is warranted.

2. Purpose

To provide additional help in responding to the situation and provide systematic handling of information and decisionmaking. Declaring an Alert will provide additional manpower in the Technical Support Center to help the normal operating crew in those duties not directly related to plant control, such as offsite dose assessment, technical problem evaluation, and communications with outside organizations. It will also activate the Operational Support Center which will provide additional manpower to respond to plant conditions. It will partially activate the Emergency Operations Facility to provide assistance in radiological events, if needed, and bring it to a state of standby readiness.

C. Site Area Emergency

1. Definition

A condition at the plant or its surroundings where the level of safety has or could be degraded to the point of losing a plant function needed to protect the public. This includes the violation of Safety Limits and associated action requirements, as defined in the WNP-2 Technical Specifications, or where a significant release of radioactive material has or could take place. It is a condition that warrants use of additional personnel for accident assessment, in-plant response, and offsite emergency response.

2. Purpose

To assure that all emergency response centers are activated, field monitoring teams dispatched, evacuation coordinators readied, and public informed. Declaring a Site Area Emergency will activate the Technical Support Center, Operational Support Center, and Emergency Operations Facility.

D. General Emergency

1. Definition

A condition at the plant or its surroundings where the level of safety has or could be degraded to the point of substantial core damage and where the loss of primary containment has occurred or is projected to occur. It is also a condition where release of large amounts of radioactive material have or could be released in a short period of time. This classification warrants the use of additional personnel for accident assessment, in-plant response, and off-site emergency response. The implementation of protective actions for the public may be warranted.

2. Purpose

To initiate predetermined protective actions for the public, as needed; to provide for continuous offsite assessment; initiate additional measures, as indicated by radiological releases; and to provide for consultation and flow of information to and from the various offsite authorities.

III. ENGINEERING BASES FOR SYMPTOMATIC INITIATING CONDITIONS

Using the definitions in the previous section and a set of defined safety parameters based on NUREG-0696 safety groups* the following bases were established for each symptomatic initiating condition.

*NUREG-0696 recommends use of five safety groups for defining the safety status of the plant. The five groups are reactivity control, core cooling parameters, coolant system integrity, containment integrity, and radioactivity control.

A. Unusual Event

1. Reactivity Control Initiating Conditions

(a) None.

(1) Basis--N/A.

2. Core Cooling Initiating Conditions

a. Lo Lo reactor water level (-50 inches).

(1) Basis--Threatens normal level of plant safety and warrants increased awareness on part of plant personnel.

3. Coolant System Integrity Initiating Conditions

a. Drywell sump flow greater than or equal to 36,000 gal/24 hr.

(1) Basis--Violates a Limiting Condition for Operation.

b. Drywell floor drain sump flow greater than or equal to 5 gpm.

(1) Basis--Violates Limiting Condition for Operation.

c. Drywell pressure greater than or equal to 1.89 psig.

(1) Basis--Condition is an early indication of a potential break in the reactor coolant pressure boundary that threatens the normal level of plant safety and warrants increased awareness on the part of plant personnel.

d. Reactor pressure vessel greater than or equal to 1148 psig.

(1) Basis--Condition indicates a failure of pressure actuated relief valves and actuation of first set of safety relief valves and therefore represents a threat to the normal level of plant safety.

4. Containment Integrity Initiating Conditions

a. Drywell temperature greater than or equal to 135⁰F for eight hours.

(1) Basis--Violates Limiting Condition for Operation.

b. Suppression Pool temperature greater than or equal to 110⁰F and power greater than or equal to one percent.

(1) Basis--Violates Limiting Condition for Operation.

c. Drywell pressure less than or equal to -2 psig for greater than or equal to one hour.

(1) Basis--Violates limiting condition for operation.

d. Suppression Pool level greater than or equal to +2 inches above normal for one hour.

(1) Basis--Violates limiting condition for operation.

e. Suppression Pool level less than or equal to -2 inches below normal for one hour.

(1) Basis--Violates Limiting Condition for Operation.

5. Radioactivity Control Initiating Conditions

a. None.

(1) Basis-N/A.

B. Alert

1. Reactivity Control Initiating Conditions

a. APRM greater than or equal to five percent, ten seconds after a scram.

(1) Basis--Condition indicative of a failure to scram and, since the automatic protective action (i.e., full scram) did not occur, the safety limits are jeopardized.

2. Core Cooling Initiating Conditions

a. Reactor water level less than or equal to -129 inches.

(1) Basis--Safety Limits are jeopardized due to possible failure of automatic protective actions (i.e., high pressure core spray) to restore water level. This condition also represents a substantial degradation of the level of plant safety.

3. Coolant System Integrity Initiating Conditions

a. Main Steam Isolation Valve closure logic met, but both inboard and outboard valves on at least one line not closed.

- (1) Basis--Situation represents a substantial degradation in the level of plant safety.

b. Reactor pressure greater than or equal to 1250 psig.

- (1) Basis--Same as 3.a above.

4. Containment Integrity Initiating Conditions

a. Containment isolation logic met, but both inboard and outboard valves on one or more Reactor Coolant Pressure Boundary (RCPB) lines do not close.

- (1) Basis--Situation represents a substantial degradation in the level of plant safety.

5. Radioactivity Control Initiating Conditions

(Later)

C. Site Area Emergency

1. Reactivity Control Initiating Conditions

a. Reactor power greater than or equal to five percent and Suppression Pool temperature greater than 110°F and a Safety Relief Valve open or drywell pressure greater than or equal to 1.69 psig.

- (1) Basis--BWR Owners' Group accident analysis indicates this unlikely condition could degrade the level of safety to the point of losing a plant function (fuel failure or containment failure) needed to protect the public.

2. Core Cooling Initiating Conditions

a. None.

3. Coolant System Integrity Initiating Conditions

a. Reactor pressure greater than 1325 psig.

(1) Basis--Safety Limit violated.

4. Containment Integrity Initiating Conditions

a. Drywell temperature greater than or equal to 340°F.

(1) Basis--This condition represents a situation where the level of safety could degrade to the point of losing a plant function (i.e., primary containment) needed to protect the public.

b. Heat Capacity Temperature Limit (HCTL) Exceeded

(1) Basis--This condition represents a situation where the level of safety could degrade to the point of losing the primary containment which is needed to protect the public.

c. Suppression Pool Level Limit (SPLL) Exceeded

(1) Basis--Same as item c.4.b. above.

d. Pressure Suppression Pressure Limit (PSPL) Exceeded

(1) Basis--Same as item c.4.b. above.

e. Heat Capacity Level Limit (HCLL) Exceeded

(1) Basis--Same as item c.4.b. above.

f. Primary Containment Pressure Limit (PCPL) Exceeded

(1) Basis--Same as item c.4.b above.

g. Drywell Spray Initiation Pressure Limit (DSIPL) Exceeded

(1) Basis--Same as item c.4.b above.

5. Radioactivity Control Initiating Conditions

(Later)

D. General Emergency

1. Reactivity Control Initiating Conditions

a. None.

2. Core Cooling Initiating Conditions

a. None.

3. Coolant System Integrity Initiating Conditions

a. None.

4. Containment Integrity Initiating Conditions

a. None.

5. Radioactivity Control Initiating Conditions

(Later)