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Emergency Management	Emergency Plan Implementing Procedures	For Additional Info: http://EDMS	Effective Date: 01/05/12
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Manual: 16E – Emergency Management – Emergency Plan
Implementing Procedures

USE TYPE 3

Change Number: 335101

*The current revision can be verified on EDMS.

1. PURPOSE AND SCOPE

This procedure provides guidance for determining emergency classification for events occurring at the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation.

2. INITIATING CONDITION

Facility management is notified of an abnormal or hazardous situation.

3. RESPONSIBILITIES

3.1 FSV Emergency Coordinator (EC): The FSV EC is responsible for evaluating the situation and determining the appropriate emergency classification for the event.

3.2 Fort St. Vrain Advisor (FSVA): If requested by the FSV EC, the FSVA is responsible for ensuring that emergency classification is completed and updated as required by the Nuclear Regulatory Commission.

4. INSTRUCTIONS

4.1 Initial Classification

NOTE: *A trained EC is on call 24 hours a day. Additional contractor personnel have been trained and are available to act as ECs.*

4.1.1 FSV EC: Obtain the following information from the person making the discovery:

- Type of incident (fire, explosion, release of hazardous material, etc.)
- Name, location, and telephone number of the person making the discovery
- Proximity of the event and of personnel to hazardous/radiological materials
- Personnel injuries and medical assistance required.

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4.1.2 FSV EC: Compare available data with the emergency action levels (EALs) in Appendices A and B.

4.1.3 FSV EC: If the conditions of an ALERT or Notification of Unusual Event (NOUE) have been met, declare the emergency classification associated with the applicable EAL.

NOTE 1: *ALERT: An event is in progress or has occurred involves an actual or potential substantial degradation of the level of safety of the ISFSI. Any radioactive releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels. For ALERT level events, the FSV CP, INL EOC and INTEC ECC will be activated in accordance with EPI-101.*

NOTE 2: *NOUE: An event is in progress or has occurred that indicates a potential for degradation of the level of safety of the ISFSI. No release of radioactive material requiring offsite response or monitoring is expected unless further degradation of the ISFSI occurs. The emergency organization for a NOUE consists of normal staff personnel. The CP and INTEC ECC may be activated at the EC's discretion.*

4.1.4 FSV EC: If the conditions of the EALs have not been met, compare the available data with the data in MCP-2924, "NRC Licensee Event and Condition Reporting," for nonemergency events.

4.1.5 FSV EC: If any of the conditions in MCP-2924 have been met, declare the applicable nonemergency category.

NOTE: *The INTEC Plant Shift Manager should be contacted to ensure correct occurrence report classification per MCP-190, "Event Investigation and Occurrence Reporting."*

4.1.6 FSV EC: Ensure the appropriate notifications based on the classification of the event are completed per EPI-103, "Event Notifications for Fort St. Vrain."

4.2 Reclassification

4.2.1 FSV EC: Periodically reassess the initial event classification.

4.2.2 FSV EC: Upgrade or downgrade the classification if appropriate.

4.2.3 FSV EC: Ensure the appropriate notifications based on the reclassification of the event are completed per EPI-103.

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4.3 Transfer of Classification to the FSVA

NOTE: *If the FSVA function is operational, classification may be transferred to the FSVA.*

- 4.3.1 FSV EC: Request the FSVA to assume the classification function.
- 4.3.2 FSV EC: Verify the FSVA has assumed the classification function.
- 4.3.3 FSV EC: Document the transfer of the classification function to the FSVA.
- 4.3.4 FSVA: Document acceptance of classification function from FSV EC.
- 4.3.5 FSVA: Ensure classification is completed in accordance with the appropriate section of this procedure (Appendix A or B).

5. RECORDS

None

6. APPENDIXES

Appendix A, Fort St. Vrain Emergency Action Levels — ALERT

Appendix B, Fort St. Vrain Emergency Action Levels — Notification of Unusual Event (NOUE)

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Appendix A

Fort St. Vrain Emergency Action Levels ALERT

1. Fire Events

A. ALERT

EAL Number	Condition	Indicator
1.A.1	Fire within the Modular Vault Dry Store (MVDS) that lasts longer than 15 min.	Reported and/or confirmed by Independent Spent Fuel Storage Installation (ISFSI) personnel.

2. Explosion Events

A. ALERT

EAL Number	Condition	Indicator
2.A.1	Explosion within the MVDS.	Reported and/or confirmed by ISFSI personnel.

3. Radiological Release Events

A. ALERT

EAL Number	Condition	Indicator
3.A.1	Drop of loaded fuel canister with a breach of the canister.	Reported or observed by ISFSI personnel.
3.A.2	Unexpected high radiation or unexpected high airborne readings.	Surveys or other indication. Contamination that indicates severe degradation in control of radioactive materials (e.g., increase of factor of 1,000 in direct radiation readings within facility).

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4. Natural Phenomena Events

A. ALERT

EAL Number	Condition	Indicator
4.A.1	<ul style="list-style-type: none"> a. Damage to MVDS structure that could result in a loss of containment or loss of shielding b. Damage to MVDS inlet/outlet cooling ducts that could result in blockage of cooling airflow or loss of shielding. 	Hazard being experienced or observed by ISFSI personnel.
4.A.2	Severe natural phenomena being experienced or projected: <ul style="list-style-type: none"> a. Ground motion felt or observed at the ISFSI b. Flood observed near design level of 6 ft c. Tornado observed striking facility. 	Reported or observed by ISFSI personnel.

5. Criticality Events

A. ALERT

EAL Number	Condition	Indicator
5.A.1	Accidental criticality.	Not determined by surveys or considered a credible accident at the ISFSI, but is included here based on requirements of 10 Code of Federal Regulations 72.74

6. Safeguards and Security Events

A. ALERT

EAL Number	Condition	Indicator
6.A.1	Armed intrusion, site-specific credible threat, or any unauthorized act that has the apparent intent or potential for affecting containment of irradiated fuel within the MVDS structure, cooling, or shielding; theft of irradiated fuel or radioactive material; or disruption of operations.	Reported or observed by ISFSI personnel
6.A.2	Loss of special nuclear material.	Reported or confirmed by ISFSI personnel.

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Appendix B

Fort St. Vrain Emergency Action Levels Notification of Unusual Event (NOUE)

1. Fire Events

N. NOUE

EAL Number	Condition	Indicator
1.N.1	Fire in the MVDS that has the potential to spread.	Reported or observed by ISFSI personnel.

3. Radiological Release Events

N. NOUE

EAL Number	Condition	Indicator
3.N.1	Accident involving storage or handling of spent fuel that could result in a loss of containment or shielding.	Reported or observed by ISFSI personnel.
3.N.2	Isolation valve failure.	Reported or observed by ISFSI personnel.
3.N.3	Transportation accident on the ISFSI site.	Reported or observed by ISFSI personnel.
3.N.4	Any event that may have the potential to impact effectiveness of facility shielding or cooling.	Reported or observed by ISFSI personnel.

4. Natural Phenomena Events

N. NOUE

EAL Number	Condition	Indicator
4.N.1	Natural phenomena that represent risk beyond normal levels: a. Floods onsite b. Tornadoes onsite.	Reported or observed by ISFSI personnel.

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6. Safeguards and Security Events

N. NOUE

EAL Number	Condition	Indicator
6.N.1	Unauthorized entry into facility environs.	Reported or observed by ISFSI personnel.
6.N.2	Unsubstantiated or potential threats, such as bomb threats, extortion, or any act that has the apparent intent of disrupting operations.	Reported or observed by ISFSI personnel.
6.N.3	Loss of major portion of a physical security system that cannot be compensated for.	Reported or observed by ISFSI personnel.

7. External Events

N. NOUE

EAL Number	Condition	Indicator
7.N.1	Aircraft crash onsite.	Reported or observed by ISFSI personnel.
7.N.2	Explosion near site.	Reported or observed by ISFSI personnel.
7.N.3	Uncontrolled toxic or flammable gases.	Reported or observed by ISFSI personnel.