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 HUSTON, R.W. Tennessee Valley Authority
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SUBJECT: Provides detailed discussion to support licensee request for NRC review & approval of cost beneficial licensing action re proposed emergency plan change - core/thermal hydraulic engineer staff augmentation.

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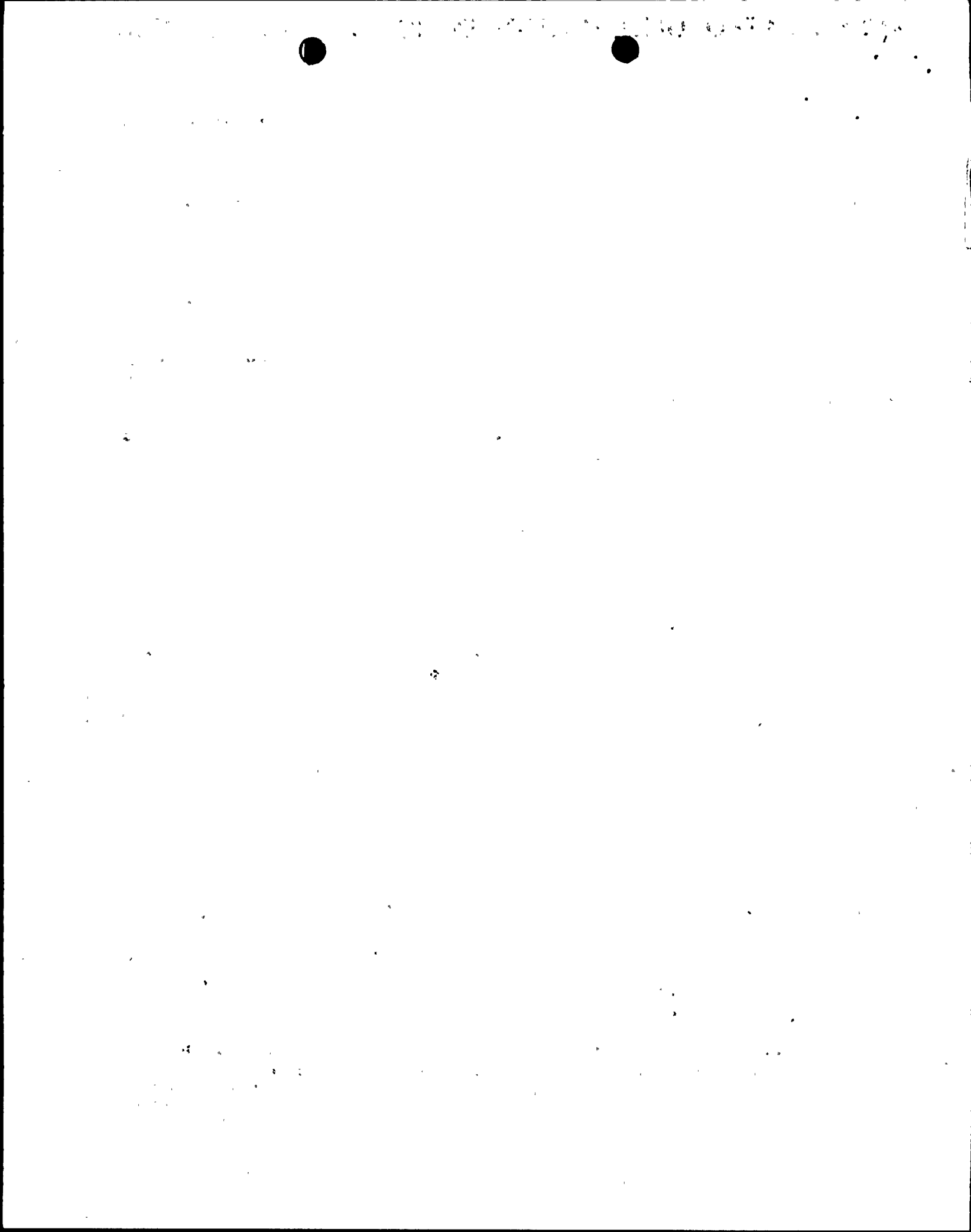
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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

10 CFR 50.54(q)

May 20, 1994

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

Gentlemen:

In the Matter of)	Docket Nos.	50-259
Tennessee Valley Authority)		50-260
			50-296
			50-327
			50-328

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 -
SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 -
REQUEST FOR NRC REVIEW AND APPROVAL OF COST BENEFICIAL
LICENSING ACTION - PROPOSED EMERGENCY PLAN CHANGE -
CORE/THERMAL HYDRAULIC ENGINEER STAFF AUGMENTATION**

TVA requests approval of a change to the Radiological Emergency Plan (REP). The proposed change revises the manner in which TVA would provide expertise in the area of core/thermal hydraulic analysis during the first hour of an emergency. This request is submitted pursuant to the requirements of 10 CFR 50.54(q).

Guidance for supplying core/thermal hydraulic expertise is contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Table B-1, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies." In the functional area of Plant System Engineering, Repair, and Corrective Actions, NUREG-0654 specifies that an individual having expertise in core/thermal hydraulic analysis be available to augment the on-shift staff within 30 minutes of an emergency.

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In order to provide core/thermal hydraulic expertise within the 30-minute time limitation, TVA must assign engineers to on-site around-the-clock shift coverage at BFN and provide for engineers to be on call at SQN. Rather than providing this level of coverage, TVA considers that the on-shift Shift Technical Advisors (STAs) can perform needed core/thermal hydraulic assessments during the first 60-minutes of an emergency. Therefore, TVA proposes to revise the REP to specify that an individual having expertise in core/thermal hydraulic analyses be available to augment the on-shift staff within 60 minutes as the Technical Support Center is staffed and activated.

The STAs are qualified and have the necessary education, background, and training for performing core/thermal hydraulic assessments. Responsibility for performing these assessments would not impact the STA's ability to respond during an emergency since the STAs perform core/thermal hydraulic assessments as a routine part of their on-shift and emergency assessment duties.

TVA has determined that the proposed change represents a cost-beneficial licensing action (CBLA) since the 30 minute staff augmentation requirement involves a high cost and provides a low safety benefit. TVA has determined that requiring the on-shift core/thermal hydraulic engineering coverage at BFN often results in significant productivity losses. In order to increase productivity, TVA proposes to revise the REP thus eliminating mandatory shift coverage at BFN. TVA estimates that the proposed REP change, if approved, will result in cost benefits of approximately \$1.68 million over the remaining life of the facility.

There is little safety benefit in requiring that an engineer be available within 30 minutes to provide core/thermal hydraulic expertise. Since the NUREG guidance was written, several improvements in the personnel qualification requirements and instrumentation provided for accident assessment have been implemented. The training and qualification requirements for STAs are much more stringent than in the past. Additionally, instrumentation is now available (e.g., Safety Parameter Display System) that facilitates analysis of core/thermal hydraulic performance. These improvements have made it no longer necessary to provide core/thermal hydraulic engineering augmentation within 30 minutes.

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In order to maintain consistency throughout TVA's nuclear units, the 30 minute staffing requirement will also be revised for SQN. Enclosure 1 provides a detailed discussion to support TVA's request. Enclosure 2 provides a marked-up copy of BFN REP Table A-1, "Site Emergency Organization," and SQN REP Figure B-1, "Technical Support Center Emergency Preparedness," to show the proposed change. There are no commitments made in this letter. If there are any questions regarding this submittal, please telephone me at (615) 751-2687.

Sincerely,



for Roger W. Huston
Manager
Nuclear Licensing and Regulatory Affairs

Enclosures
cc: See page 4

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Enclosures

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3
SEQUOYAH NUCLEAR PLANT (SQN)
UNITS 1 AND 2

OPERATING AND MAINTENANCE COST REDUCTION PROGRAM
COST BENEFICIAL LICENSING ACTION
CHANGE TO EMERGENCY PLAN STAFFING REQUIREMENT
CORE/THERMAL HYDRAULIC ENGINEER STAFF AUGMENTATION

I. SUMMARY OF CBLA

TVA proposes to revise the manner in which supplemental core/thermal hydraulic engineering support is provided during the first hour of an emergency. In order to meet current TVA Radiological Emergency Plan (REP) 30-minute time limitations for providing core/thermal hydraulic staff augmentation during emergencies, engineers from the Technical Support organization are assigned to around-the-clock shift coverage at BFN and are required to be on call at SQN. Needed core/thermal hydraulic expertise can be provided by the on-shift Shift Technical Advisor (STA); therefore, TVA proposes to revise the REP to specify that supplemental core/thermal hydraulic expertise be provided within 60 minutes as the Technical Support Center (TSC) is staffed and activated.

The change for BFN is requested since TVA would like to remove the Technical Support engineers from mandatory shift coverage. This will result in significant productivity enhancements and associated cost savings. The change for SQN is requested to maintain consistency at TVA nuclear sites.

TVA considers that the proposed change to the REP meets the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50 Appendix E. However, TVA recognizes that this change could be considered a decrease in the effectiveness of the REP since staff augmentation would be accomplished in 60 minutes following an emergency declaration rather than the current 30 minutes. Accordingly, TVA is requesting NRC approval of this proposed change pursuant to the provisions of 10 CFR 50.54(q).

II. BACKGROUND

The REP prescribes the overall measures used for responding to emergency situations at TVA's nuclear units. The REP is modeled after the guidance contained in NUREG 0654, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." In the functional area of providing

technical support during emergencies, NUREG 0654 Table B-1, "Minimum Staffing Requirements for Emergencies," specifies that an engineer having expertise in the area of core/thermal hydraulics be available to augment on-shift personnel within 30 minutes of the emergency.

In order to provide core/thermal hydraulic expertise within the 30-minute time limitation, TVA elected to meet the core/thermal hydraulic support augmentation commitment using engineers from the Technical Support organization. At BFN, TVA must use engineers who are on-site around-the-clock. At SQN, TVA must use engineers who are on a limited response time call out.

If an emergency occurs at BFN, the assigned technical support engineer is responsible for reporting to the on-shift STA and providing assistance as needed. The technical support engineer continues to report to the STA until the technical support center (TSC) is activated. When the TSC is activated, the technical support (core/thermal hydraulics) engineer reports functionally to the Technical Assessment Team Leader in the TSC.

If an emergency occurs at SQN, the on-shift STA provides core/thermal hydraulic support until the technical support engineer arrives on-site. At this time the technical support engineer assumes these duties and reports to the STA until the TSC is activated. When the TSC is activated, the technical support engineer will the report to the TSC Technical Assessment Team Leader.

The engineers chosen to provide core/thermal hydraulic support are qualified prior to assuming their assigned duties. Core/thermal hydraulics engineer duties are encompassed by the Technical Assessor duties specified in BFN's and SQN's Emergency Plan Implementing Procedure(EPIP)-6, "Activation and Operation of the Technical Support Center (TSC)." These duties include:

- Complete trend graphs as needed.
- Provide the TSC staff and Central Emergency Command Center (CECC) Plant Assessment Team with current assessments on plant conditions.
- Project future plant status based on current conditions.
- Provide technical support as needed.
- Provide information for the TSC status boards.

At BFN, technical support engineers were originally selected since they had been assigned around-the-clock shift coverage to support maintenance and operations activities. Since Unit 2 has been restarted and is operating, the need to

provide around-the-clock shift coverage to support maintenance and operations is no longer necessary. Therefore, TVA would like to eliminate mandatory shift coverage to improve productivity.

III. REQUESTED NRC LICENSING ACTION

Pursuant to the requirements of 10 CFR 50.54(q), TVA requests approval of a change to the current REP requirement that supplemental core/thermal hydraulic engineering support be available to augment the on-shift staff within 30 minutes. TVA proposes to change the staff augmentation requirement from 30 to 60 minutes and denote that the STA is responsible for performing core/thermal hydraulic assessments during the first 60 minutes of an emergency. Enclosure 2 provides marked-up copies of BFN Figure A-1, "Site Emergency Organization," and SQN Figure B-1, "Technical Support Center Emergency Preparedness," to show the proposed change.

IV. BASIS FOR REQUESTED NRC LICENSING ACTION

The intent of the NUREG 0654 guidance to have a core/thermal hydraulic engineer available within 30 minutes is to ensure that sufficient expertise in this area is readily available. TVA considers that the STAs provide adequate expertise for assessing core/thermal hydraulic performance during the first 60 minutes of an emergency for the following reasons:

- STAs are on-shift and in position to assess core/thermal hydraulic performance during the first stages of an accident.
- STAs have the education and experience necessary for performing core/thermal hydraulic assessments.
- STAs receive extensive training to ensure that they are qualified to perform core/thermal hydraulic assessments.
- STA duties and responsibilities require that they perform core/thermal hydraulic assessments.
- Instrumentation is now available, which was not installed when the NUREG guidance was written, to facilitate analysis of core/thermal hydraulic performance (e.g., Safety Parameter Display System [SPDS]).

STAs are part of the on-shift staff since they serve as an on-shift technical advisor to the Shift Operations Supervisors. During the first stages of an emergency requiring core/thermal hydraulic assessments, the STAs are aware of the plant status and precursor situations that may have led to the emergency. The STAs are in position to

perform needed core/thermal hydraulic assessments.

The background, education, and experience requirements for STAs are adequate for providing core/thermal hydraulic expertise. STAs must have a bachelor's degree or equivalent in engineering or an applied science. STAs must have at least one year of nuclear power plant experience and six months of this experience must be on site. STAs must be knowledgeable of control room instruments and controls.

STAs receive extensive training that qualifies them to perform core/thermal hydraulic assessments. The training includes basic theoretical and advanced instruction. STA training related to assessing core/thermal hydraulic performance is provided in the following areas:

- Basic engineering principles, including plant specific thermodynamics/fluid flow, reactor physics, system engineering, plant response, and instrumentation.
- Plant transient and accident response.
- Mitigating core damage.

The primary objective of the STA during emergencies is to maintain an overview of the event by observing plant parameters and their trends, operator responses and actions, system responses and performance, and plant environmental conditions through comparison of actual and predicted conditions. In order for the STA to meet this objective, the STA routinely assesses core/thermal hydraulic performance. Table 1 lists the duties and responsibilities of the STA during emergency conditions. The duties and responsibilities that require performance of core/thermal hydraulic analyses are noted.

The guidance provided in NUREG 0654 was published in 1980. Since then, improvements in accident monitoring capability have been implemented that greatly enhance the ability to monitor core/thermal hydraulic performance. Of particular use for assessing plant performance in this area is the SPDS. The SPDS is designed to automate and enhance the generation of information necessary for rapid detection and evaluation of abnormal and emergency conditions.

TVA has reviewed the STA duties and responsibilities and determined that the STA is fully capable of performing necessary core/thermal hydraulic assessments during the first 60 minutes of an emergency. The support provided by the Technical Support engineer is not needed to ensure that the STA's duties and responsibilities are executed.

Support for the core/thermal hydraulic assessment function will be readily available within 60 minutes as the TSC is staffed and activated. The proposed revision will specify

that individuals with expertise in performing core/thermal hydraulic assessments be part of the emergency response organization and report to the TSC within 60 minutes of an emergency being declared.

Finally, the duties and responsibilities of the core/thermal hydraulic engineers related to their role in the TSC (e.g., providing the TSC and CECC staffs with current plant conditions) are not needed during the first hour of an emergency. The TSC and CECC are not required to be operational during the first hour of an emergency. Therefore, delaying the response time of the core/thermal hydraulic engineer to 60 minutes will not impact the ability of TVA to meet TSC performance objectives.

V. JUSTIFICATION FOR HIGHER PRIORITY REVIEW

A. CBLA Is Safety Neutral

TVA considers that the proposed change is consistent with the provisions of 10 CFR 50.47(b), 10 CFR 50 Appendix E, and the intent of NUREG 0654. The proposed change does not affect the ability to ensure that necessary core/thermal hydraulic expertise is available. As described above, the STA is capable of providing adequate core/thermal hydraulic engineering support during the first hour of an emergency. STAs routinely perform core/thermal hydraulic assessments as part of their emergency duties. The STA is more qualified, better trained, and in a better position to make these assessments than an individual reporting within 30 minutes.

Extending the time required for the core/thermal hydraulic engineer from 30 minutes to 60 minutes would not affect the operation of the TSC. The TSC is not required to be staffed and operational during the first hour of an emergency. An engineer capable of performing core/thermal hydraulic assessments would be readily available when the TSC is staffed and operational.

B. CBLA Provides Significant Cost Savings and Other Benefits

TVA conservatively estimates that approval of this revision to the REP would result in indirect cost savings of approximately \$1.68 million over the remaining life of the facility. The cost savings would be realized since inefficiencies could be eliminated that are associated with providing around-the-clock shift coverage at BFN. While on shift work, TVA estimates that a significant amount of an engineers time is lost due to the following concerns:

- Routine business and engineering decisions are typically made by or approved by supervisory/management personnel. On weekends and back-shifts, these personnel are generally unavailable or it takes extra effort to contact the appropriate individual.
- Engineers frequently require support of personnel that are not assigned shift coverage. Productivity is often lost since "support" personnel are not readily available.
- Shift coverage results in some system engineers not being available during normal business hours to perform emergent work related to their normal responsibilities. This often results in situations where the engineer's backup must respond to an issue. Time is wasted because the backup engineer must expend more time to become familiar with the system and also, the backup engineer's normal responsibilities get delayed.
- Some productivity is lost due to the "human factors" associated with working on backshifts and providing rotating shift coverage. The engineers assigned shift coverage normally work day-shift.
- Providing shift coverage requires that a certain amount of overtime be dedicated to this function. Due to overtime restrictions, it is often difficult to provide engineering coverage for emergent situations.
- Time spent on shift-turnover would be eliminated.

In addition to the above, significant management attention is needed to administer the scheduling and contingencies (e.g., calling out another individual if the assigned engineer is unable to report to work) associated with providing shift coverage.

TVA conservatively estimates that productivity improvements of approximately 15% will occur by eliminating shift coverage. Additionally, elimination of the requirement to maintain shift coverage for emergency response purposes would allow improved flexibility in providing the appropriate level of staffing to support plant operations and maintenance. Staffing levels could be promptly adjusted to provide the maximum benefit for changing circumstances. Thus, TVA could eliminate shift coverage to improve productivity and allow increased management attention to other, more important work.

Providing around-the-clock shift coverage involves a significant expenditure of resources. A minimum of three engineers per day (one per 8-hour shift), seven days per week are needed. Over 22 years (the Unit 2 operating license expires in 2016), a 15% productivity increase results in savings of approximately \$1.68 million at today's salary costs.

VI. CONCLUSION

The proposed change is consistent with the provisions of 10 CFR 50.47(b) and 10 CFR 50 Appendix E. The STA is fully qualified and capable of assessing core/thermal hydraulic performance during the first 60 minutes of an emergency. The STA's performance in this capacity meets the intent of NUREG 0654 guidance to have engineering support for assessing core/thermal hydraulic readily available.

The responsibilities of the core/thermal hydraulic engineer that relate to his/her function in the TSC (e.g., providing the TSC and CECC staffs with current plant conditions) are not needed for the first 60 minutes. As the TSC is staffed and becomes operational, an engineer having expertise in core/thermal hydraulic assessments will be available to perform any necessary support functions.

TVA has determined that the proposed REP change is a cost beneficial licensing action since it is safety neutral and provides significant cost savings. The proposed change will allow TVA to make changes that are intended to improve productivity as well as provide flexibility in meeting changing plant conditions. Therefore, TVA requests expeditious NRC review of this proposed exemption.



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STA DUTIES AND RESPONSIBILITIES
DURING EMERGENCY CONDITIONS

THERMAL
HYDRAULIC
ASSESSMENT
REQUIRED?

STA EMERGENCY DUTIES AND RESPONSIBILITIES

Maintain an overview of the event by observing plant parameters and their trends, operator responses and actions, system responses and performance, and plant environmental conditions through comparison of actual and predicted conditions.	Yes
Verify that systems and team actions are responding and serving to correctly mitigate the event, and advise of departures from the expected and required.	Yes
Effectively communicate event mitigation information to the appropriate organizations as directed.	No
Assist in interpreting and applying the Technical Specifications, including recognition and notification of plant conditions, which involve Safety Limits or Limiting Safety System Settings.	No
Provide independent verification of critical safety functions.	Yes
Recognize events that may affect the safety, health, and/or welfare of the public or plant personnel.	Yes
Recognize events that may affect plant security.	No
Recognize events that require prompt NRC notification and/or result in Emergency Plan Implementing Procedure entry conditions.	No
Recognize plant conditions that are outside of analyzed conditions and may lead to core damage.	Yes
Perform calculations, as necessary, for assessment, evaluation, and compliance.	Yes
Monitor plant critical parameter indications for operability and if parameters become unavailable due to instrument failure, calculate or otherwise determine approximate values for the parameters in question.	Yes
Maintain a chronological log of major events, observations, and recommendations.	No
Assist in determining emergency classification and reporting requirements.	No

STA DUTIES AND RESPONSIBILITIES
DURING EMERGENCY CONDITIONS

THERMAL
HYDRAULIC
ASSESSMENT
REQUIRED?

STA EMERGENCY DUTIES AND RESPONSIBILITIES

Recognize plant conditions that effect implementation of the Emergency Operating Instructions. Verify appropriate procedural implementation.	Yes
Determine the appropriate reactor water level instrument(s) to use for a given set of plant conditions.	Yes
Verify the proper operation of the core spray pumps and residual heat removal pumps when they are used.	Yes
Determine if suppression pool, drywell, and reactor pressure vessel temperatures, pressures, and levels can be maintained within safe limits. Provide recommendations based on values and trends.	Yes
Determine the heat capacity level limit and verify suppression pool level can be maintained within safe limits. Provide recommendations based on values and trends.	Yes
Recognize indications and alarms for area temperatures that exceed normal and safe limits. Provide recommendations based on values and trends.	No
Recognize indications and alarms for area radiation levels that exceed normal and safe limits. Provide recommendations based on values and trends.	No
Recognize indications and alarms for area water levels that exceed normal and safe limits. Provide recommendations based on values and trends.	No
Verify, monitor, and log containment water level.	No
Recognize when plant conditions require entrance into the Safe Shutdown Instructions.	No

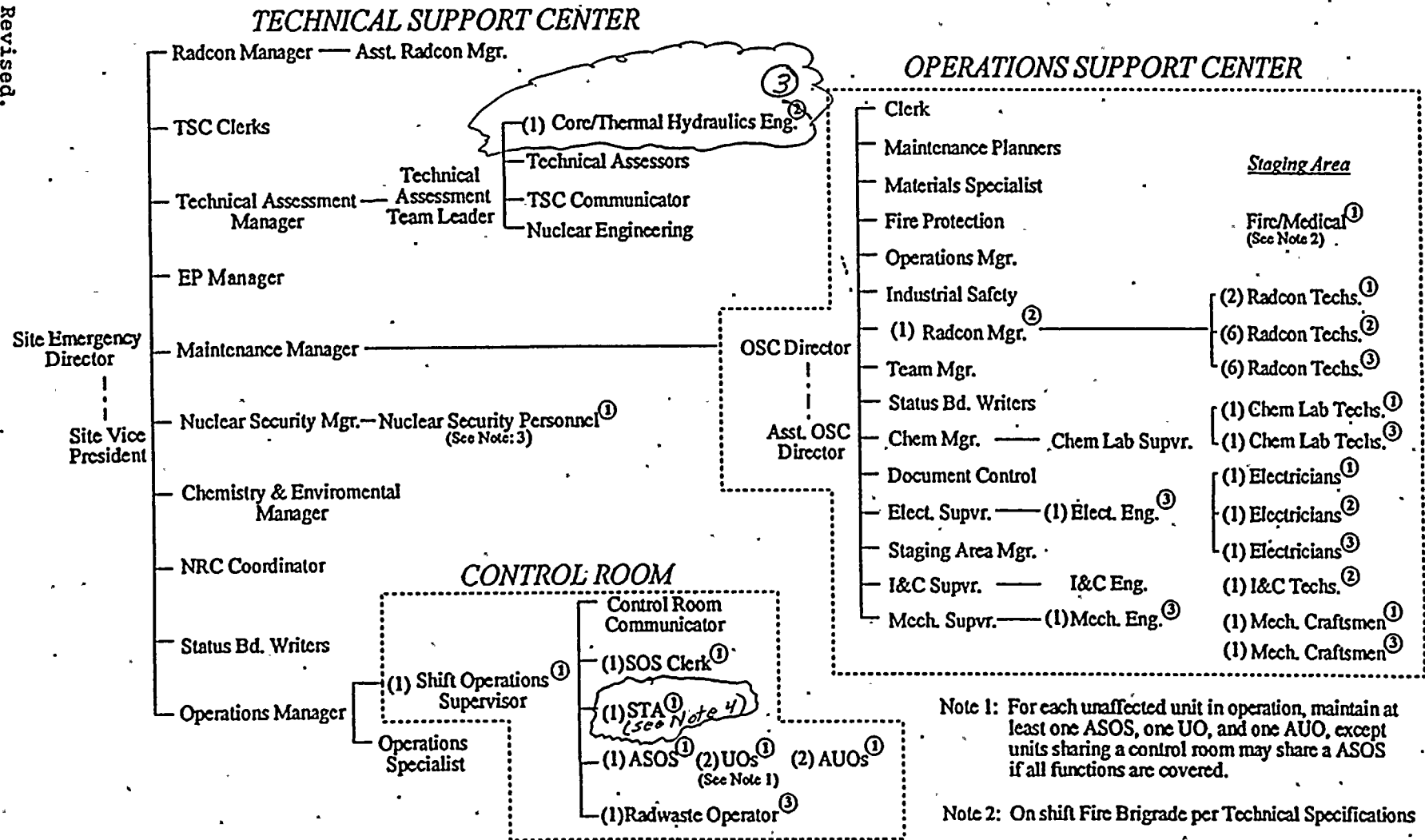
ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3
SEQUOYAH NUCLEAR PLANT
UNITS 1 AND 2

MARKED-UP BFN AND SQN REP
FIGURE A-1
SITE EMERGENCY ORGANIZATION

(see attached)

**FIGURE A-1
SITE EMERGENCY ORGANIZATION**
(Including Minimum Staffing and Staff Augmentation)



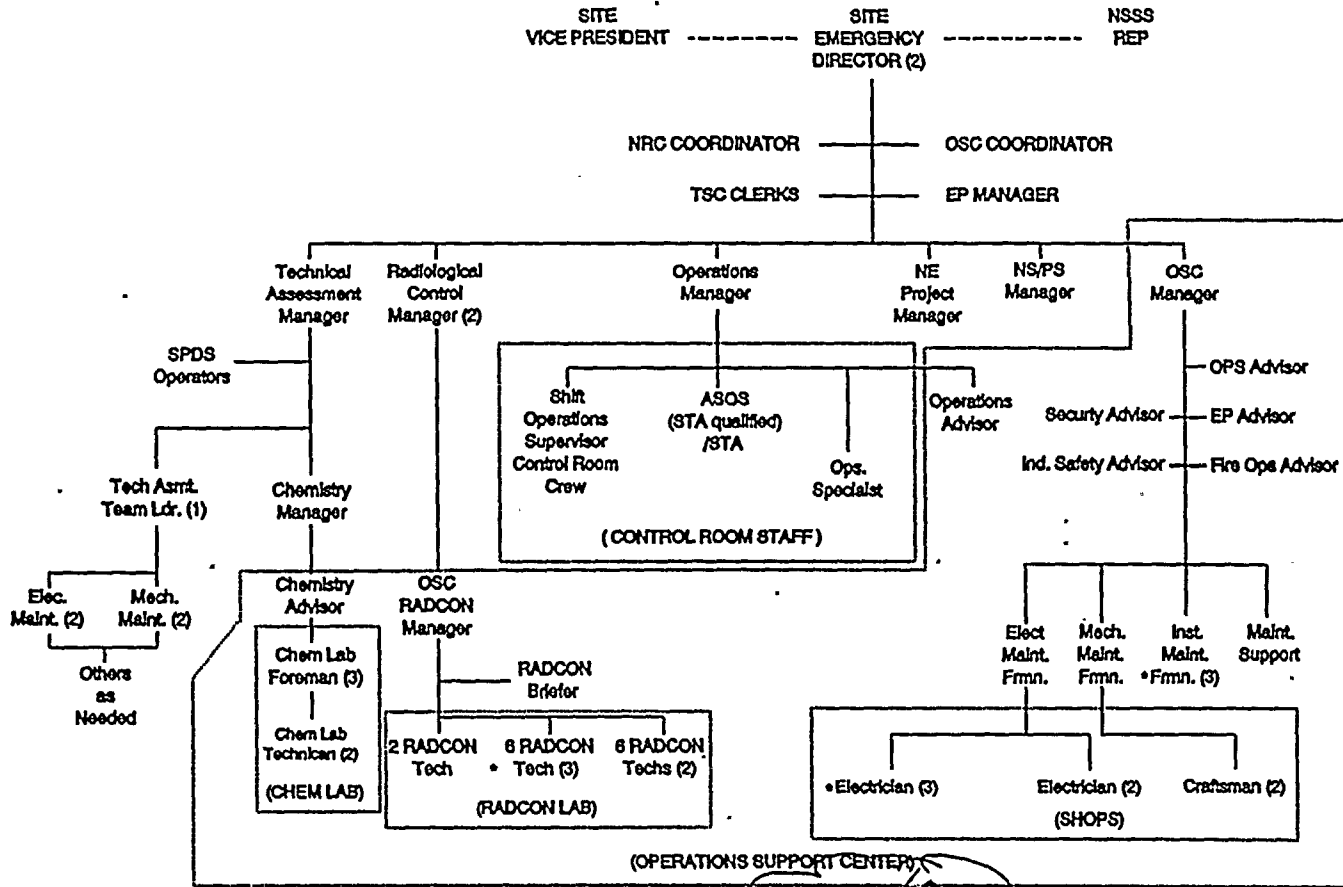
① On Shift
 ② Augment within approximately 30 minutes following the declaration of Alert or higher classification
 ③ Augment within approximately 60 minutes following the declaration of an Alert or higher classification.

Note 1: For each unaffected unit in operation, maintain at least one ASOS, one UO, and one AUO, except units sharing a control room may share a ASOS if all functions are covered.
 Note 2: On shift Fire Brigade per Technical Specifications
 Note 3: On shift Security Personnel per Security Plan
 Note 4: Assumes Responsibility for Core/Thermal Hydraulic Assessment function During First 60 minutes of Event



TECHNICAL SUPPORT CENTER EMERGENCY PREPAREDNESS

(TECH SUPPORT CENTER)



(OPERATIONS SUPPORT CENTER)

- (1) Will arrive within approximately 30 minutes, following declaration of an Alert or higher classification. Will be core/thermal hydraulics trained, May be TATL or a TAT member.
- (2) Will arrive within approximately 60 minutes, following declaration of an Alert or higher classification. All others will arrive as soon as possible after notification
- (3) Will arrive within approximately 30 minutes, following declaration of an Alert or higher classification.

FIGURE B-1

