



Kewaunee Nuclear Power Plant
N490, State Highway 42
Kewaunee, WI 54216-9511
920-388-2560

*Operated by Nuclear
Management Company, LLC*



August 29, 2000

10 CFR 50, App. E

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Radiological Emergency Response Plan Implementing Procedures

Pursuant to 10 CFR 50 Appendix E, Wisconsin Public Service Corporation hereby submits one copy of the latest revisions to the Kewaunee Nuclear Power Plant Radiological Emergency Response Plan Implementing Procedures (EIPs). These revised procedures supersede the previously submitted procedures.

Pursuant to 10 CFR 50.4, two additional copies of this letter and attachment are hereby submitted to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region III, Lisle, Illinois. As required, one copy of this letter and attachment is also submitted to the Kewaunee Nuclear Power Plant NRC Senior Resident Inspector.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Weinbauer". The signature is fluid and cursive, written over a white background.

Kenneth H. Weinbauer
General Manager-Kewaunee

DLF

Attachment

cc - US NRC Senior Resident Inspector, w/attach.
US NRC, Region III (2 copies), w/attach.
Electric Division, PSCW, w/o attach.
QA Vault, w/attach.

A-045

KEWAUNEE NUCLEAR POWER PLANT

August 29, 2000

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

RETURN TO DIANE FENCL - KNPP

OUTSIDE AGENCY COPIES (1-20)

- ~~T. Webb - NRC Document Control Desk (1)~~
- T. Webb - NRC Region III (2 & 3)*
- T. Webb - NRC Resident Inspector (4) (receives Appx. A phone numbers)*
- T. Webb - State of Wisconsin (5)*
- T. Webb - KNPP QA Vault w/NRC Letter (15)*

- Bob Hayden - Wisconsin Electric Power Co. (10)
- Craig Weiss - Wisconsin Power & Light (11)

PERSONAL COPIES (21-40) These copies are for the personal use of the listed individuals for reference or emergency response.

- | | | | |
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| J. Bennett (33) | D. Mielke (35) | J. Mueller (13) | K. Weinhauer (28) |

REFERENCE COPIES - CUSTODIAN (41-100) These copies are for general reference by anyone. They are distributed throughout the plant and corporate offices. The named individual is the responsible custodian for the procedures and shall insure they are properly maintained.

- | | |
|--|--|
| STF (86, 87, 88) | LOREB - STF (62, 67, 68, 70, 72, 73, 74) |
| L. Duggan - Fuel Services (65) | STF Library (43) |
| QP Library - KNPP (59) | Resource Center (82, 89, 94, 131) |
| C. Sternitzky - ATF-2 (44) | D. Schrank - Maintenance Off. (41) |
| D. Braun - Admin. Bldg. Upper (45) | M. Anderson - CR/SS Office (51, 56) |
| P. Ehlen - I&C Office (42) | L. Renier-Hicks - GB-D2 Nuclear (84) |
| M. Daron - Security Building (46) | J. Mueller - TSC (50) |
| L. Renier-Hicks - GB-D2 Nuclear EOF (77) | C. Long - RAF (53) |
| J. Mueller - OSF (52) | C. Long - SBF/EMT (54) |
| C. Hutter - ATF-1 (64) | C. Long - RPO (55) |
| LOREB - ATF-1 (66) | |

WORKING COPIES (101-199) These copies of procedures are kept in the areas designated for use in response to an emergency. These are not complete sets, but contain only those procedures that are used to implement activities in the location where they are kept. Please dispose of any sections distributed that are not tabbed in the indicated copy.

- | | |
|--|---|
| C. Long - RAF/RPO (106, 107) | M. Anderson - CR/Communicator (116)(Partial Distribution) |
| C. Long - SBF/ENV (108, 109) | Simulator/Communicator (117) |
| C. Long - SBF/EM Team (110, 111, 111A) | J. Fletcher - Security (121) |
| C. Long - Aurora Medical Center (118, 119) | N. Deda - Security Building (120) |
| W. Flint - Cold Chem/HR Sample Room (113) | K. Evers (125) |
| N. Deda - SBF/SEC (114) | J. Stoeger (126) |

Originals to KNPP QA Vault

Please follow the directions when updating your EPIP Manual. **WATCH FOR DELETIONS!!!** These are controlled procedures and random checks may be made to ensure the manuals are kept up-to-date.

***THIS IS NOT A CONTROLLED COPY. IT IS A COPY FOR INFORMATION ONLY.**

KEWAUNEE NUCLEAR POWER PLANT
REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES
 August 29, 2000

Please follow the directions listed below. If you have any questions regarding changes made to the EIPs, please contact Dave Seebart at ext. 8719. If you are a controlled copy holder (see cover page), return this page to Diane Fencl by September 29, 2000, SIGNED AND DATED to serve as a record of revision.

EPIP Index, dated 08-29-2000.

DELETE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EP-AD-05	A	EPIP-AD-05	B
EPIP-AD-15	M	EPIP-AD-15	N
EP-OSF-2	R	EPIP-OSF-02 (EP-FIG-039 & 039a should be placed after EPIP-OSF-02 – there were no changes to the figures but some books no longer had them placed behind the procedure & they should be)	S
EP-RET-9	J	EPIP-RET-09	K
EP-TSC-4	K	EPIP-TSC-04	L
EPIP Form TSC 4.1	E	Form EPIPF-TSC-04-01	F
EPIP Form TSC 4.2	E	Form EPIPF-TSC-04-02	F
EPIP Form TSC 4.3	E	Form EPIPF-TSC-04-03	F

I CERTIFY Copy No. _____ (WPSC No.) of the Kewaunee Nuclear Power Plant's EIPs has been updated.

SIGNATURE

DATE

Please return this sheet to *DIANE FENCL*.



Diane Fencl

Enclosure

EMERGENCY PLAN IMPLEMENTING PROCEDURES

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DATE: 08-29-2000

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EP-AD			
EPIP-AD-01	Personnel Response to the Plant Emergency Siren	F	03-28-2000
EPIP-AD-02	Emergency Class Determination	Z	03-07-2000
EPIP-AD-03	KNPP Response to an Unusual Event	AA	04-18-2000
EPIP-AD-04	KNPP Response to Alert or Higher	AB	04-18-2000
EP-AD-5	Site Emergency	Deleted	04-27-87
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	B	08-29-2000
EP-AD-6	General Emergency	Deleted	04-24-87
EPIP-AD-07	Initial Emergency Notifications	AK	02-01-2000
EP-AD-8	Notification of Alert or Higher	Deleted	02-26-96
EP-AD-9	Notification of Site Emergency	Deleted	04-27-87
EP-AD-10	Notification of General Emergency	Deleted	04-27-87
EP-AD-11	Emergency Radiation Controls	P	08-10-99
EP-AD-12	Personnel Assembly and Accountability	Deleted	03-26-94
EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
EP-AD-13B	Emergency Assembly/Evacuation	Deleted	03-01-83
EP-AD-13C	Site Evacuation	Deleted	03-01-83
EP-AD-14	Search and Rescue	Deleted	05-25-94
EPIP-AD-15	Recovery Planning and Termination	N	08-29-2000
EP-AD-16	Occupational Injuries or Vehicle Accidents During Emergencies	Deleted	03-14-97
EP-AD-17	Communications	Deleted	03-05-84
EPIP-AD-18	Potassium Iodide Distribution	N	06-01-2000
EP-AD-19	Protective Action Guidelines	O	06-23-98
EP-ENV			
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EP-ENV-3A	Environmental Protection Director Actions and Directives	Deleted	09-26-84
EP-ENV-3B	EM Team Actions	Deleted	09-26-84
EPIP-ENV-03C	Dose Projection Using RASCAL Version 2.2 Software	U	02-16-2000
EP-ENV-3D	Revision and Control of ISODOSE II	Deleted	02-14-95
EP-ENV-3E	Manual Determination of X/Q	Deleted	04-24-87
EP-ENV-3F	Manual Determination of X/Q (Green Bay Meteorological Data)	Deleted	05-30-86
EP-ENV-3G	Manual Dose Projection Calculation	Deleted	06-02-89
EP-ENV-3H	Protective Action Recommendations	Deleted	04-13-90
EPIP-ENV-04A	Portable Survey Instrument Use	S	06-15-2000
EP-ENV-4B	Air Sampling and Analysis	U	02-23-99
EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
EP-ENV-4C	Ground Deposition Sampling and Analysis	U	02-23-99
EP-ENV-4D	Plume Tracking for Environmental Monitoring Teams	L	02-23-99
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
EP-ENV-5C	SAM II Operation	Deleted	04-14-86
EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
EP-ENV-5E	Reuter-Stokes Operation	Deleted	08-27-85
EP-ENV-6	Data Analysis, Dose Projections and Protective Action Recommendations	Deleted	12-21-81
EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
EP-ENV-7	Site Access Facility Communications	Deleted	09-26-84
EP-ENV-8	Total Population Dose Estimate Calculations	Deleted	04-14-86

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EP-EOF-2	Emergency Operations Facility (EOF) Activation	W	08-10-99
EPIP-EOF-03	Corporate Action for Unusual Event	Z	06-01-2000
EPIP-EOF-04	Corporate Action for Alert or Higher	AF	06-01-2000
EP-EOF-5	Corporate Staff Action for Site Emergency	Deleted	04-24-87
EP-EOF-6	Corporate Staff Action for General Emergency	Deleted	04-24-87
EP-EOF-7	Notification of Unusual Event	Deleted	04-06-94
EP-EOF-8	Relocation of EOF	Deleted	03-01-83
EP-EOF-8	Continuing Emergency Notifications	R	08-31-99
EP-EOF-9	Interface with Support Organizations	Deleted	03-05-84
EP-EOF-9	Notification of Site Emergency	Deleted	04-24-87
EP-EOF-10	Notification of General Emergency	Deleted	04-24-87
EPIP-EOF-11	Internal Communication and Documentation Flow	T	06-01-2000
EP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center Security	N	08-10-99
EP-OP			
EP-OP-1	Control Room Emergency Organization	Deleted	04-24-87
EP-OP-2	Emergency Control Room Activation for Emergency Response	Deleted	04-24-87
EP-OP-3	Control Room Communications	Deleted	04-24-87
EP-OSF			
EP-OSF-1	Operation Support Facility Emergency Organization	Deleted	04-24-87
EPIP-OSF-02	Operational Support Facility Operations	S	08-29-2000
EP-OSF-3	Work Requests During an Emergency	M	09-21-99
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
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EP-RET-2A	RPO - RAF Activation	Q	07-27-99
EP-RET-2B	Gaseous Effluent Sample and Analysis	Q	03-03-98
EP-RET-2C	Containment Air Sampling and Analysis	Deleted	03-01-83
EP-RET-2D	Emergency Radiation Entry Controls and Implementation	L	07-27-99
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
EP-RET-2F	Personnel Decontamination	Deleted	04-13-90
EPIP-RET-03	Chemistry Emergency Team	O	02-01-2000
EP-RET-3A	Liquid Effluent Release Paths	K	01-12-99
EP-RET-3B	Post-Accident Reactor Coolant Alternate Sampling Procedure	Deleted	01-25-88
EP-RET-3C	Post Accident Operation of the High Radiation Sample Room	O	01-18-2000
EP-RET-3D	Containment Air Sampling Analysis Using CASP	M	01-18-2000
EP-RET-3E	Post Accident Operation of High Rad Sample Room Inline Multiported Count Cave	Deleted	08-27-85
EP-RET-4	SBF Activation	P	07-27-99
EP-RET-4A	EOF Radiological Monitoring	Deleted	03-10-83
EP-RET-4A	SBF Operation/Relocation	C	07-27-99
EP-RET-4B	Radiological Controls at Site Access Facility	Deleted	07-12-94
EP-RET-4C	Site Radiological Monitoring	Deleted	07-12-94
EP-RET-4D	SAM-II Operation	Deleted	07-12-94
EP-RET-5	Plume Projection	Deleted	09-26-84
EPIP-RET-05	Site Boundary Dose Rates During Controlled Plant Cooldown	G	07-18-2000
EP-RET-5A	Plume Projection	Deleted	04-27-87
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EPIP-RET-08	Contamination Control of the Aurora Medical Center	O	06-15-2000
EPIP-RET-09	Post-Accident Population Dose	K	08-29-2000
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EPIP-SEC-02	Security Force Response to Emergencies	U	03-28-2000
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EPIP-SEC-03	Personnel Assembly and Accountability	X	03-28-2000
EPIP-SEC-04	Security Force Actions for Dosimetry Issue	O	02-16-2000
EP-SEC-5	Security Force Response to the EOF	Deleted	07-28-88
EPIP-SEC-05	Personnel Evacuation	E	02-16-2000
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EPIP-TSC-02	Technical Support Center Activation	R	07-18-2000
EP-TSC-3	Plant Status Procedure	T	07-21-98
EPIP-TSC-04	Emergency Physical Changes, Major Equipment Repair	L	08-29-2000
EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
EPIP-TSC-07	RV Head Venting Time Calculation	H	03-07-2000
EPIP-TSC-08A	Calculations for Steam Release from Steam Generators	M	03-07-2000
EPIP-TSC-08B*	STMRLS Computer Program	E	03-07-2000
EP-TSC-8C*	See EP-TSC-8B	Deleted	04-16-92
* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			

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EP-TSC-9	Core Damage Assessment Using Released Radionuclides	Deleted	09-30-86
EP-TSC-9A*	Core Damage Assessment	I	02-23-99
EPIP-TSC-09B*	CORE Computer Program	I	03-07-2000
EP-TSC-9C*	See EP-TSC-9B	Deleted	04-16-92
* EP-TSC-9A, Rev. D was totally deleted; therefore, EP-TSC-9B became EP-TSC-9A. EP-TSC-9B was previously EP-TSC-9C.			
EPIP-TSC-10	Technical Support for IPEOPs	H	07-18-2000

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APPX-A-6	EP-FIG-008		Floor Plan - Radiological Analysis Facility	ORIG	03-03-98
EP-EOF-12 Form EOF 2.1	EP-FIG-009		Floor Plan - Division Office Building (2nd Floor)	A	08-10-99
APPX-A-6	EP-FIG-012		Floor Plan - State/County Work Area (D2-1)	B	09-21-99
APPX-A-6	EP-FIG-013		Floor Plan - NRC Work Area (D2-4)	ORIG	03-03-98
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APPX-A-6	EP-FIG-034		Floor Plan - Media Briefing Center	Deleted	08-04-98
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APPX-A-6	EP-FIG-037		Floor Plan - Corporate Response Center	Deleted	08-04-98
APPX-A-6	EP-FIG-038		Floor Plan - JPIC	Deleted	08-04-98
EP-OSF-2	EP-FIG-039		High Priority Work	ORIG	07-08-98
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APPX-A-6	EP-FIG-044		JPIC - State and County Work Area	ORIG	08-04-98
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EPIP-APPX-A-2	Response Personnel Call List	BG	06-15-2000
EPIP-APPX-A-3	Off-Site Telephone Numbers	BI	06-15-2000
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AD 7.2	State Call-Back - Question Guideline	B	04-16-96
AD 11.1	Emergency Radiation Work Permit	F	04-16-96
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ENV 1.3	Meteorological and Plant Status Data	A	09-03-96
ENV 1.4	EMT Orders/Field Data	A	09-03-96
ENV-02-01	EMT Activation Checklist	M	06-15-2000
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EOF 4.1	SRCL Initial Action Checklist	B	09-16-97
EOF 4.2	Telephone Communications Log Sheet	ORIG	04-16-96
EOF 8.3	Fax for Emergency Declaration or Status Updates	F	09-21-99
EOF 8.5	Plant Emergency Status Report	ORIG	02-21-95
EOF 8.6	Radiological Status Report	C	03-14-97
EOF 11.2	Operating Status	E	02-14-95
EOF 11.3	Environmental Status Board	E	07-31-95
EOF 12.1	I.D. Badge Registration Form	F	08-04-98
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OSF 2.2	Maintenance Work in Progress	Deleted	07-08-98
OSF 3	Operational Support Facility Team Briefing	A	02-14-95
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RET 2B.1	Containment Stack Release (Grab Sample)	C	04-16-96
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RET 2B.5	Steam Release	C	04-16-96
RET 2B.6	Field Reading (Grab Sample)	A	04-16-96
RET 4	SAM-II Counting Equipment Worksheet	D	04-16-96
RET 8.3	Hospital Survey 1	E	07-25-97
RET 8.4	Hospital Survey 2	Deleted	07-25-97
RET 8.5	Hospital Survey 3	Deleted	07-25-97
RET-08-06	Hospital Survey 4	F	06-15-2000
RET 9	Environmental TLD Record Sheet	C	02-14-95
EP-SEC			
SEC-03.01	Emergency Accountability Log	A	03-28-2000
SEC 4.1	Emergency Dosimeter Log	F	02-16-2000
EP-TSC			
TSC 1.1	Plant Status Summary for SAM Implementation	A	04-01-99
TSC 1.2	Severe Accident Management Summary and Strategy Recommendation	A	04-01-99
TSC 1.3	Severe Accident Management - Status	A	04-01-99
TSC 2.1	TSC and OSF Activation Checklist	N	04-01-99
TSC 2.2	TSC Ventilation Checklist	H	04-01-99
TSC 2.3	Emergency Response Data System (ERDS) Link Initiation Checklist	F	04-01-99
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TSC 2.5	TSC and OSF De-activation Checklist	ORIG	04-01-99
TSC 3.1	Plant System Status	K	02-14-95
TSC 3.2	Plant Equipment Status	K	08-12-97
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TSC 3.4	Radiation Monitors	G	02-14-95
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TSC 7	Head Venting Calculation	E	02-14-95
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TSC 8A.2	Steam Release Calculation Sheet (Energy Balance)	F	02-14-95
TSC 8A.3	Steam Release Data/Calculation Sheet (Open Valve)	D	02-14-95
TSC 8A.4	Steam Release Data/Calculation Sheet (STMRLS Program)	C	04-16-96
TSC 9A.1	Core Damage Based on Reactor Vessel Level & Fuel Rod Temp.	C	02-14-95
TSC 9A.2	Core Damage Based on Radiation Monitors	C	02-14-95
TSC 9A.3	Cs-134 and Cs-137 PCF Determination	D	04-16-96
TSC 9A.4	Core Damage Based on Activity Ratios	C	02-14-95
TSC 9A.5	Core Damage Assessment (Monitoring Data)	D	04-16-96
TSC 9A.6	Core Damage Summary	C	02-14-95

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No. EPIP-AD-05	Rev. B
		Title Emergency Response Organization Shift Relief Guideline	
		Date AUG 29 2000	Page 1 of 5
Reviewed By <i>Walter M. Barthelme</i>		Approved By <i>David R. Seebart</i>	
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

1.0 Purpose

- 1.1 This procedure provides instruction for conducting shift relief of the Emergency Response Organization (ERO) and support staff during a declared emergency.

2.0 General Notes

- 2.1 The shift relief process is a method used by ERO members and supporting plant staff to provide relief from their emergency response tasks by personnel replacement while maintaining the functions of the emergency organization.

3.0 Precautions and Limitations

- 3.1 None

4.0 Initial Conditions

- 4.1 When a plant emergency of alert or higher has been declared or when directed by the Emergency Director or Emergency Response Manager, this procedure should be implemented during the preparation for, conduct of, and closure of a shift relief.

5.0 Procedure

- 5.1 Directors shall:

- 5.1.1 Evaluate how much facility and position coverage is needed during the next shift of ERO operation.
- 5.1.2 Identify, with the help of subordinates, the individual(s) available for comprising the relief shift.

Note

Briefings should be conducted at a location outside the respective response facility if it would disrupt the operation of the facility.

- 5.1.3 Determine where the relief shift will meet for the start of the next shift.
- 5.1.4 Determine where debriefs will be conducted for off-going personnel (outside the working spaces of the facility).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-05	Rev.	B
	Title	Emergency Response Organization Shift Relief Guideline		
	Date	AUG 29 2000	Page 2 of 5	

- 5.1.5 Gather all relief shift personnel (off-going personnel) present in the location designated for debriefs.
- 5.1.6 Provide a briefing to the relief shift that includes, but is not limited to:
- Current plant and event status.
 - Expected relief shift activities.
 - Return time.
 - If available, provide return logistics information provided by the Site Protection Director to the on-site relief shift, OR
IF return logistics is NOT available, THEN advise the relief shift that they will be called by their on-shift counterpart with that information.
- 5.1.7 Obtain or update an accurate name and phone number list of on-shift and relief shift staff.
- 5.1.8 Brief the on-shift staff regarding the relief shift return time and logistics appropriate for the facility.
- 5.1.9 Direct each on-shift staff member whose relief was not present for the relief shift briefing in step 5.1.6 to contact their relief person and provide the return time and logistics information.
- 5.1.10 WHEN the relief shift arrives, provide a status update briefing to the oncoming shift ERO members.
- 5.1.11 WHEN all individual position turnovers are completed, a general facility briefing should be conducted for the new on-shift staff.
- 5.1.12 IF final conditions (step 6.0) have not been met, THEN return to step 5.1.1.

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5.2 The Site Protection Director (or designees) shall:

5.2.1 WHEN directed by the Emergency Director, coordinate the movement of the shift personnel to and from KNPP.

5.2.2 Review relief shift report location(s), time, and expected routes into the plant with Directors in the TSC.

!! Caution !!

To Prevent Injury or Death

Plant staff being relieved must follow the evacuation and reception center check-in requirements of either the Kewaunee County Emergency Government or Manitowoc County Emergency Management when leaving the plant.

5.2.3 Contact the Kewaunee County Emergency Operations Center (EOC) to decide appropriate ingress and egress route(s) for the plant through Kewaunee County.

- a. Call (920) 487-9792 and ask for Law Enforcement.
- b. Determine the best routes through Kewaunee County and the EPZ traffic checkpoints.
- c. Discuss approximate number of people needing ingress and egress of the plant and the approximate time.
- d. Discuss the appropriate mode of transportation (car, bus, etc.).
- e. Determine county contact points for coordinating an entrance or exit from the EPZ.

5.2.4 Contact the Manitowoc County Emergency Operations Center (EOC) to decide appropriate ingress and egress route(s) for the plant through Manitowoc County.

- a. Call (920) 683-4201 and ask for the Sheriff.
- b. Determine the best routes through Manitowoc County and the EPZ traffic checkpoints.
- c. Discuss approximate number of people needing ingress and egress of the plant and the approximate time.
- d. Discuss the appropriate mode of transportation (car, bus, etc.).
- e. Determine county contact points for coordinating an entrance or exit from the EPZ.

5.2.5 IF bus transportation is needed, THEN contact the Administrative Logistics Director in the EOF to arrange for this service.

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- 5.2.6 Inform all Directors and the ERM of the information determined in steps 5.2.3 through 5.2.5.
- 5.2.7 Review and implement procedure EPIP-SEC-05 for staff who will be leaving the plant.
- 5.2.8 IF final conditions (step 6.0) have not been met, THEN return to step 5.2.1.
- 5.2.9 IF final conditions (step 6.0) have been met, THEN discontinue the use of this procedure.

5.3 All ERO members and support staff shall:

- 5.3.1 Obtain the phone number where the person designated to relieve you can be contacted while off duty.
- 5.3.2 WHEN directed, contact the relief person and give them the following information:
 - Location to report to, the facility or a designated staging area.
 - The route to take to the reporting location.
 - The time to be at the reporting location.
- 5.3.3 WHEN your relief arrives, perform a one-on-one turnover paying particular attention to:
 - Status of events and activities related to the position.
 - Events and activities that will carry forward into the next shift.
 - Events and activities that must be initiated during the next shift.
- 5.3.4 Work side-by-side for as long as needed to ensure continuity of effort.
- 5.3.5 If appropriate, meet for a debrief with the off-going shift at a location designated by your director.

6.0 Final Conditions

- 6.1 The Emergency Response Manager has determined that shift rotation will not be required or the plant emergency has been closed out or recovery actions have begun and the Emergency Response Manager has suspended the use of EIPs.

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7.0 References

- 7.1 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.2 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.3 EPIP-ENV-01, Environmental Monitoring Group Organization and Responsibilities
- 7.4 EPIP-EOF-03, Corporate Action for Unusual Event
- 7.5 EPIP-EOF-04, Corporate Action for Alert or Higher
- 7.6 EPIP-OSF-02, Operational Support Facility Operations
- 7.7 EPIP-RET-02, In-Plant Radiation Emergency Team
- 7.8 EPIP-RET-03, Chemistry Emergency Team
- 7.9 EPIP-TSC-01, Technical Support Center Organization and Responsibilities
- 7.10 Nuclear Emergency Public Information Plan, Procedures Section

8.0 Records

- 8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

- 8.1.1 QA Records

None

- 8.1.2 Non-QA Records

None

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		Title	Recovery Planning and Termination		
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Reviewed By <i>William Barthel</i>		Approved By <i>X Hever</i>			
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

1.0 Purpose

- 1.1 This procedure provides instruction for terminating a declared emergency, establishing a recovery plan, restoring the plant to a normal operating status, and deactivating the Emergency Response Organization.
- 1.2 The goals of the recovery effort are to assess the in-plant consequences of the emergency, to assist the state with the intermediate and ingestion phase radiological operations and to initiate plant cleanup and repair operations.

2.0 General Notes

- 2.1 During a declared emergency, a point is reached when the plant will be placed in a stable condition. Factors which pose a threat to the health and safety of the general public will be identified and controlled. These conditions could be attained even though specific Emergency Action Levels are exceeded. The Emergency Director, in conjunction with the Emergency Response Manager, will determine that there is no longer a need to keep the emergency organization in effect. After a decision has been made to terminate the emergency, then plant recovery operations will begin.

2.2 Definitions

- 2.2.1 Recovery - During all declared emergencies, a point will be reached at which the plant will be placed in a stable condition. Also, factors which could pose a threat to the health and safety of the general public will be identified and controlled. With the understanding that this condition could be attained even though specific Emergency Action Levels are still exceeded, the Emergency Director, in conjunction with the Emergency Response Manager, will determine that there is no longer a need to keep the emergency organization in effect and to begin plant recovery operations.

3.0 Precautions and Limitations

- 3.1 None

4.0 Initial Conditions

- 4.1 This procedure shall be implemented upon declaration of an Alert, Site Emergency, General Emergency, or when directed by the Shift Supervisor or Emergency Director.

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5.0 Procedure

5.1 Responsibilities

5.1.1 **Emergency Director, in conjunction with the Emergency Response Manager, will determine:**

- 5.1.1.1 At the onset of an emergency condition, response action to mitigate the consequences of the accident takes precedence over recovery actions. The Emergency Response Manager may initiate some limited recovery operation during the response phase. Gradually, as the response effort begins to abate, recovery efforts gain more importance.
- 5.1.1.2 EPIP-AD-02 is not written to facilitate de-escalation, therefore, any decision to de-escalate must be based on a thorough review of EPIP-AD-02 to determine whether any EAL applies to current plant conditions.
- 5.1.1.3 It is not required to de-escalate from an emergency action level. Moving from a given action level directly into recovery is preferable. However, there may be occasions when it is more appropriate to de-escalate.
- 5.1.1.4 Refer to and review Section 9 of the Kewaunee Nuclear Power Plant Emergency Plan.
- 5.1.1.5 Review any procedures specific to the emergency necessary to supplement this procedure.
- 5.1.1.6 Evaluate the status of emergency conditions and determine at what point in time the emergency organization can be secured and return to the normal plant and corporate organization. Evaluate plant damage and on-site radiological clean-up operations needed. Evaluate off-site radiological impact that may have occurred or may continue during the recovery operation.
- 5.1.1.7 Determine the manpower, equipment, and materials needed to start the recovery operation.
- 5.1.1.8 Make recommendations to the General Manager - Kewaunee concerning who would be best suited to fill the positions of Recovery Manager and Environmental Liaison (if needed).

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5.1.2 Recovery Manager

- 5.1.2.1 Works with appropriate plant and corporate personnel to formulate a recovery plan which will return the Plant to a normal operating status.
- 5.1.2.2 Maintain routine contact with all appropriate Federal, State, and Local Agencies concerning recovery operations until the recovery is terminated.
- 5.1.2.3 Oversee the recovery operation based on guidance stated in Section 5.2.2 below.
- 5.1.2.4 Ensures that all new nuclear safety related procedures are reviewed by Plant Operations Review Committee (PORC) prior to use.

5.1.3 Environmental Liaison (if designated)

- 5.1.3.1 Coordinate all environmental radiological sampling and analysis performed by Nuclear Management Company (NMC) staff contracted environmental monitoring personnel.
- 5.1.3.2 Maintain contact with Federal, State, and Local Agencies performing environmental radiological sampling within the EPZ.
- 5.1.3.3 Obtain sample results from Federal, State, and Local Agencies and compare these results to NMC obtained sample results.

5.2 Requirements

- 5.2.1 Securing the Emergency Organization: The Emergency Director, in conjunction with the Emergency Response Manager, will review and address the items listed below prior to securing the emergency organization.
 - 5.2.1.1 The plant is in a shutdown condition and/or there is no apparent likelihood that the initial emergency situation will recur or that further plant degradation will develop.
 - 5.2.1.2 Radiation levels in affected in-plant areas are stable or decreasing.
 - 5.2.1.3 Releases of radioactive material to the environment greater than Technical Specifications have ceased.
 - 5.2.1.4 Containment pressure is steady or decreasing.
 - 5.2.1.5 The reactor is in a safe shutdown condition and long-term core cooling is established or is capable of normal operations within Technical Specifications. Verify shutdown margin as required by Technical Specifications for the core has been established. Evaluate the possibility of an uncoolable core.

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- 5.2.1.6 Any fire, flood, earthquake, or similar emergency conditions are controlled or have ceased.
- 5.2.1.7 All required emergency notifications have been completed.
- 5.2.1.8 There is no longer a need for the full activation of the emergency response organization or emergency response facilities.
- 5.2.2 Recovery Operation: The Manager - Kewaunee Plant and the Recovery Manager will remain cognizant of the items listed below during the recovery operation.
 - 5.2.2.1 Appropriate off-site authorities shall be informed of the recovery organization and plans, including communication links to be used.
 - 5.2.2.2 The declared emergency will be investigated and documented through the Licensee Event Report (LER) system in accordance with NAD-11.08, "Kewaunee Assessment Process (KAP)."
 - 5.2.2.3 When completed, a copy of the event LER shall be sent to:
 - a. The NRC
 - b. The State of Wisconsin, Wisconsin Emergency Management
 - c. The Kewaunee County Emergency Government
 - d. The Manitowoc County Emergency Management
 - 5.2.2.4 Procedures or procedure changes instituted to respond to the emergency shall be evaluated for their applicability prior to use during the recovery process.
 - 5.2.2.5 Plant accountability and access control status will be reviewed and appropriate procedures implemented.
 - 5.2.2.6 The PORC shall review all nuclear safety related procedures for plant recovery.
 - 5.2.2.7 An estimation of the total population radiation exposure will be calculated for any and all releases of radioactive material that took place during the declared emergency. The analysis will be performed using established procedures and using Regulatory Guide 1.109 as a reference.

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6.0 Final Conditions

- 6.1 Recovery operations may be terminated and the plant returned to a normal operating status after the General Manager - Kewaunee is confident that the plant can be maintained within Technical Specifications.

7.0 References

- 7.1 NRC Inspection Report 88-11 (COMTRAK 88-067)
- 7.2 Kewaunee Nuclear Power Plant Emergency Plan, Section 9
- 7.3 Kewaunee Nuclear Power Plant Technical Specifications and Operating License
- 7.4 Kewaunee Nuclear Power Plant USAR
- 7.5 Title 10 Code of Federal Regulations Parts 20 and 50, Appendix E
- 7.6 NRC Inspection Report K-87-195
- 7.7 EPIP-RET-09, Post-Accident Population Dose

8.0 Records

- 8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

None

8.1.2 Non-QA Records

None

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Reviewed By		<i>William M. Bennett</i>		Approved By		
				<i>David R. Seibert</i>		
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

1.0 Purpose

- 1.1 This procedure provides instruction for the Operational Support Facility (OSF) Staff when responding to an **Alert, Site Emergency, or General Emergency**.

2.0 General Notes

- 2.1 None

3.0 Precautions and Limitations

- 3.1 Ensure accountability of personnel and OSF Staff reporting to the OSF is maintained throughout the incident (See EPIP-SEC-03) via the Technical Support Center (TSC) Area Accountability Coordinator.
- 3.2 A radiation survey of designated OSF assembly area or use of a portable radiation monitoring instrument for verification of habitability will be performed per Appendix B, Form EPIPF-TSC-02-01.
- 3.3 IF it becomes necessary to evacuate the designated OSF assembly area, THEN a minimum staff will be maintained in the lower TSC. Additional OSF support personnel will be evacuated per EPIP-SEC-05.

4.0 Initial Conditions

- 4.1 This procedure shall be implemented upon declaration of an **Alert, Site Emergency, General Emergency**, or when directed by the Shift Supervisor or Emergency Director.

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5.0 Procedure

5.1 Fire Team and Repair Team Accountability

5.1.1 Fire Team

- a. IF you have not been notified that a fire exists, THEN proceed to your assigned Turn Out Gear location.
 - Report the team member names to the Shift Supervisor (SS) or Event Operations Director (EOD).
 - Upon completion of initial accountability, if the Fire Team is not required, report to Accountability Location as follows:
 1. Admin. Team to ATF-1 Accountability Location
 2. Annex Team to Warehouse Accountability Location
- b. IF you have been notified that a fire exists, THEN:
 - Upon hearing the plant siren, assemble and account at your Turn Out Gear Lockers (Admin. and Annex).
 - If time permits, one team member should locate the nearest Gai-tronics, telephone, or portable radio, and report the names and locations of the fire team members to the SS or EOD.
 - Respond to the fire keeping the SS or EOD informed of your actions.
- c. During subsequent soundings of the plant alarm:
 - IF you are in the field investigating or fighting a fire, THEN DO NOT report to an Accountability Location.
 - IF time permits, THEN one team member should locate the nearest Gai-tronics, telephone, or portable radio and report the names and locations of the team members to the SS or EOD.
 - IF time does not permit, THEN proceed with your emergency duty regardless of accountability concerns.

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5.1.2 ERO Repair Teams

- a. IF you have not been contacted by the SS, Support Activity Director (SAD), or a Maintenance Supervisor in regards to performing an emergency duty, THEN proceed to the OSF upon hearing the plant siren.
- b. IF you have been contacted by the SS, SAD, or Maintenance Supervisor and have been instructed to (1) perform an emergency duty, (2) report to the OSF, or (3) report to another area in response to the emergency (e.g., obtain equipment or tools), THEN:
 - Upon hearing the plant siren, locate the nearest Gai-tronics or telephone and contact the SS, SAD, or Maintenance Supervisor (whomever contacted you) to report your location.
 - If you are continuing on to another area, inform this person.
 - Continue with your emergency duty as instructed.
- c. During subsequent soundings of the plant alarm, if you are in the field performing an emergency duty:
 - Do not report to an Accountability Area.

Note

IF you are actually required to leave the area, THEN the OSF Coordinator will inform you.

- Locate the nearest Gai-tronics or telephone and report your location to the OSF Coordinator.

5.2 OSF Coordinator

5.2.1 WHEN notified that an Emergency has been declared:

- a. Report to the Operational Support Facility.
- b. IF an OSF Coordinator **HAS** been designated, until released, THEN assist the designated OSF Coordinator.
- c. IF an OSF Coordinator **HAS NOT** been designated, THEN notify the Support Activity Director of your intent to assume the responsibilities of the OSF Coordinator and continue implementation of this procedure.

5.2.2 Notify the Support Activity Director of your assumption of the responsibilities of the OSF Coordinator.

5.2.3 Obtain the ERO Response binder from the "TSC Material Locker."

5.2.4 Verify an OSF Support Person is available to implement step 5.3 of this procedure or assign another OSF staff member to this task.

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- 5.2.5 Direct an OSF Assembly Area Staff Member to:
- a. Develop a list of OSF personnel resources by name and emergency duty position.
 - b. If required, serve as Accountability Coordinator to maintain personnel accountability.
 - c. Relay briefings during the course of the event.
- 5.2.6 Ensure that each work group (i.e., electrical, mechanical, I&C) has a designated Maintenance Group Supervisor present.
- 5.2.7 Notify additional support personnel as needed, using the telephone numbers listed in EPIP-APPX-A-2.
- 5.2.8 Obtain and maintain knowledge of “work in progress” and “work to be performed” upon arrival at the OSF and throughout the event.
- Note**
Both the OSF and the TSC “High Priority Work” status boards must be in unison.
- a. Post the jobs actually in progress with the priority (No. 1-7) assigned by the ED on the “High Priority Work” status board.
 - b. Post the jobs awaiting team assignment on the “Lower Priority Work” status board.
- 5.2.9 Provide updates to the OSF Support Person, SAD, and TSC Data Coordinator as needed, to maintain the “High Priority” and “Lower Priority” status boards current.
- 5.2.10 Brief the OSF Staff periodically on priority and pending work.
- 5.2.11 Ensure an OSF Event Log of all significant events and actions is maintained. Including as a minimum:
- a. Date
 - b. Time
 - c. Significant Event/Action
 - d. Name of person information was received from or sent to
 - e. Initials of person making log entry
- 5.2.12 Assist the SAD as required for evaluation of equipment and material necessary to support the emergency response organization.
- 5.2.13 Assist the SAD in the review of work requests and the planning and scheduling of work as required.

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- 5.2.14 Implement emergency repair and modifications on plant equipment and systems as directed by the SAD in accordance with EPIP-OSF-03.
 - a. Ensure pre-job briefings are conducted using Form EPIPF-OSF-03-01, "Operational Support Facility Team Briefing."
- 5.2.15 Implement search and rescue operations as directed by the SAD in accordance with EPIP-OSF-04.
- 5.2.16 Provide manpower, equipment, and material necessary to support the emergency organization.
- 5.2.17 Support accountability of OSF staff members through the designated Accountability Coordinator in the TSC.
- 5.2.18 If appropriate, plan a shift relief for OSF Support Personnel per EPIP-AD-05.
- 5.2.19 IF final conditions (step 6.0) HAVE NOT been met, THEN return to step 5.2.8.
- 5.2.20 WHEN final conditions are met (step 6.0):
 - a. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 - b. Collect all completed forms, notes, and other documentation and give them to the TSCD.

5.3 OSF Support Person

- 5.3.1 WHEN notified that an Emergency has been declared:
 - a. Report to the Operational Support Facility.
 - b. IF an OSF Support Person HAS been designated, until released, THEN assist the designated OSF Support Person.
 - c. IF an OSF Support Person HAS NOT been designated, THEN notify the OSF Coordinator of your intent to assume the responsibilities of the OSF Coordinator and continue implementation of this procedure.
- 5.3.2 Ensure that there are copies of EPIP-OSF-03, "Operational Support Facility Team Briefing," are available.
- 5.3.3 Maintain OSF Status Boards as directed by the OSF Coordinator.
- 5.3.4 Maintain an "OSF Event Log" of significant events, announcements, and OSF Coordinator priorities.
- 5.3.5 Record incoming and outgoing ad hoc telephone messages on Form EPIPF-EOF-04-02, "Telephone Communications Log Sheet."

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5.3.6 Inform the OSF Coordinator promptly of information received from maintenance teams in the field or other support organizations.

5.3.7 WHEN requested, make document copies.

5.4 Operations Staff Support

5.4.1 Operations Staff reporting to the OSF may be needed to support the Control Room or the OSF. Priority should be given to the Control Room for the use of their time.

5.4.2 Operations Staff in the OSF may be asked to provide support for:

<p>!! Caution !!</p> <p>To Prevent Injury or Death</p> <p><i>The dispatch of Operations Personnel from the OSF must be coordinated between the EOD and the ED to prevent conflicting or redundant assignments. SROs in the OSF need to make sure that they do not compromise the decisions or priorities of the on-shift Shift Supervisor.</i></p>
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- a. Tag-out preparation.
- b. System and component location information.
- c. Work package preparation.
- d. Direct assignment to maintenance repair teams.

6.0 Final Conditions

6.1 Plant emergency has been Terminated or Recovery actions have begun and the responsible director has suspended the use of EPIPs.

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7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP Appendix A, Communications
- 7.3 EPIP Appendix B, Form EPIPF-TSC-02-01, TSC and OSF Activation Checklist
- 7.4 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.5 PMP-83-01, Operational Support Facility Inventory
- 7.6 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.7 EPIP-AD-14, Search and Rescue
- 7.8 EPIP-TSC-02, Technical Support Center Activation

8.0 Records

8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

- OSF Event Log
- Telephone Communications Log Sheet, Form EPIPF-EOF-04-02
- Operational Support Facility Team Briefing, Form EPIPF-OSF-03-01

8.1.2 Non-QA Records

None

HIGH PRIORITY WORK

<u>PRIORITY</u>	<u>MWR NUMBER</u>	<u>DESCRIPTION</u>	<u>WORKER ASSIGNED</u>	<u>EST.COMP. TIME</u>
1	_____	_____	_____	_____
		_____	_____	_____
		_____	_____	_____
2	_____	_____	_____	_____
		_____	_____	_____
		_____	_____	_____
3	_____	_____	_____	_____
		_____	_____	_____
		_____	_____	_____
4	_____	_____	_____	_____
		_____	_____	_____
		_____	_____	_____
5	_____	_____	_____	_____
		_____	_____	_____
		_____	_____	_____
6	_____	_____	_____	_____
		_____	_____	_____
		_____	_____	_____
7	_____	_____	_____	_____
		_____	_____	_____
		_____	_____	_____

HIGH PRIORITY WORK

EP FIG-039
 JUL 8 1998
 REV. ORIG

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		Title	Post-Accident Population Dose			
		Date	AUG 29 2000	Page 1 of 7		
Reviewed By						
Nuclear Safety Related <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		PORC Review Required <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		SRO Approval Of Temporary Changes Required <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

1.0 Purpose

- 1.1 This procedure provides instruction for determining integrated radiation doses at preselected geographical locations within the 10-mile EPZ and at other locations of interest based on population density.

2.0 General Notes

- 2.1 Approximately 179 Thermoluminescent Dosimeters (TLDs) are posted in the environment for the purpose of routine (annual) environmental dose determination. It is these TLDs, already posted, which would be utilized during the recovery phase of an accident to acquire data for use in quantifying dose to the population from radioactive materials released from the plant to the environment.
- 2.2 Other TLDs placed in the environment by Kewaunee Nuclear Power Plant (KNPP) as part of the Radiological Environmental Monitoring Program (REMM, Table 2.2.1-A) and the Area Monitoring Program (TLD), per procedure HP-03.010, can also be used for this same purpose.

3.0 Precautions and Limitations

- 3.1 It must be stressed that this procedure is to be done only after the plant has been placed in a safe shutdown condition and releases of radioactive material to the environment greater than Offsite Dose Calculation Manual (ODCM) limits have ceased. Changeout of these TLDs is to be part of the long-term recovery and assessment of an accident involving radioactive releases.

4.0 Initial Conditions

- 4.1 None

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5.0 Procedure

5.1 Preparation for TLD Changeout

- 5.1.1 Obtain a duplicate set of TLDs used for environmental monitoring. These are obtained from the vendor per the applicable purchase order. Each environmental TLD is mounted near a 3" x 4" sign. Signs are green with white lettering and attached to the power poles (See Attachment A).
- 5.1.2 Place the control TLDs into a lead safe.
- 5.1.3 Spike 10 additional TLDs to a nominal exposure of 1 Rem (Cesium-137). Then place these into the lead safe. Label all badges placed in the lead safe with the date spiked, exposure, and batch to which they belong. Retain these for further reference along with the control TLDs.

5.2 TLD Changeout

- 5.2.1 Obtain a copy of the electrical distribution department pole maps. If not readily available at KNPP, contact the Electric Distribution and Engineering Department (EDE) in Green Bay for a set of these maps as stated under step 2.1. Mounting locations for the TLDs are as follows:

TLD #	LOCATION	TLD #	LOCATION	TLD #	LOCATION
1	2124-2R5	61	2224-23E19	121	2324-14W19
2	2124-11R14	62	2224-23W9	122	2324-22W12
3	2124-11L1	63	2224-26W1	123	2324-16L18
4	2124-10W2	64	2224-22R4	124	2324-29E6
5	2124-2W1	65	2224-27R1	125	2324-19L6
6	2124-2L18	66	2224-27R7	126	2324-27L20
7	2124-3W20	67	2224-34E5	127	2324-26E17
8	2124-4W3	68	2224-24R4	128	2325-30L20
9	2124-6W12	69	2224-33R6	129	2325-31E10
10	2124-6R26	70	2224-28R9	130	2223-10L13
11	2124-4L18	71	2224-28E5	131	65A7
12	2124-8L3	72	2224-22L2	132	2025-31E11
13	2124-7L12	73	2224-22W8	133	2325-8E1
14	2124-16W5	74	2224-22E11	134	2425-32R4
15	2124-16E9	75	2224-12R3	135	2324-1R11
16	2124-15L13	76	2224-12L9	136	2324-10L6
17	2124-16L9	77	2224-14W6	137	2323-13E6
18	2124-20W5	78	2224-14W11	138	2323-24L3

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TLD #	LOCATION	TLD #	LOCATION	TLD #	LOCATION
19	2123-13R7	79	2224-16E5	139	2323-33E6
20	2123-14L1	80	2224-16L15	140	2223-9W15
21	2123-11R4	81	2224-8R11	141	2223-29E9
22	2323-1W2	82	2224-8L4	142	2123-8E2
23	2124-26E1	83	2223-12L2	143	2123-21R11
24	2124-23L27	84	2223-13R8	144	2123-35L12
25	2124-26E14	85	2224-17R10	145	2024-9L10
26	2124-25L8	86	2224-20R6	146	2024-14R4
27	2025-4W17	87	2224-19R3	147	2025-30E11
28	2025-6R12	88	2224-29R19	148	Coast Guard Station - Two Rivers
29	2024-2R15	89	2224-31E8	149	WPSC - Two Rivers Ops Bldg.
30	2025-6W14	90	2224-32E14	150	Manitowoc City Hall Roof
31	2124-27R13	91	2224-32R22	151	1924-9E11
32	2124-33E6	92	2224-31R1	152	2525-33R9
33	2124-32L27	93	2224-31L5	153	KNPP SW Fence
34	2024-10R12	94	2223-25E1	154	KNPP West Fence @ SW End
35	2025-7L23	95	2223-23E5	155	KNPP West Fence Center
36	2025-9R2	96	2223-33E2	156	KNPP West Fence @ North End
37	2124-21L8	97	2223-35E7	157	KNPP North Fence West End
38	2124-29W1	98	2223-27E5	158	KNPP North Fence Center
39	2124-14L21	99	2223-16E11	159	KNPP North Fence East End
40	2124-31L48	100	2223-15E7	160	KNPP East Fence North End
41	2124-25R3	101	2223-3E5	161	KNPP East Fence East of ATF
42	2123-26W15	102	2223-2R5	162	KNPP East Fence East of Admin
43	2123-16E14	103	2224-6L11	163	KNPP @ Vent House over Forebay

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TLD #	LOCATION	TLD #	LOCATION	TLD #	LOCATION
44	2123-4R30	104	2324-32L7	164	KNPP East Fence Near Gatehouse
45	2123-4W8	105	2224-9W15	165	KNPP South Fence Near Gatehouse
46	2224-26R4	106	2224-4R22	166	KNPP South Fence Near Anx/Wrhse
47	2224-26L7	107	2224-4E1	167	Near Circ Water Discharge
48	2224-35R12	108	2224-3W2	168	SE Corner of KNPP South Plant Parking Lot
49	2224-35R1	109	2224-2E7	169	Pole Near Old Met Tower
50	2224-36W6	110	2225-6W2	170	2224-36W15 Near New Met Tower
51	2224-35E2	111	2224-12W11	171	KNPP Sewage Plant N Wall at Fence
52	2224-26R18	112	2224-2L12	172	NE Corner of Microwave Tower Fence
53	2224-26R15	113	2224-3L8	173	SE Corner of Switch Yard Fence Line
54	2224-26R11	114	2323-35E2	174	Substation SE Corner of Building
55	2224-26E13	115	2323-36E11	175	SE Corner of STF Building
56	2224-23R1	116	2324-29L3	176	Power Pole Near STF Pump House
57	2224-25W16	117	2324-35W13	177	North Woods @ Garage
58	2224-24R1	118	2324-36W7	178	South School Forest Gazebo NW Corner Post
59	2224-13R3	119	2325-8L1	179	South Parking Lot @ SW Corner
60	2224-24W3	120	2324-13L4		

- 5.2.2 Obtain a portable micro-rem meter (Eberline PRM-7 or Ludlum-12S).
- 5.2.3 Assemble the maps, TLDs, micro-rem meter, data sheets, tools, and a clipboard in a vehicle. Then proceed to each location listed above.
- 5.2.4 TLDs are mounted on power poles approximately 2 meters above ground level. The TLDs are attached to the pole by a metal clip or velcro.

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- 5.2.5 TLD placement on the pole is in relation to the plant. In other words, it is mounted on the pole such that it is facing the direction of KNPP, not shielded from the plant by the pole.
- 5.2.6 Remove the existing TLD, replace it with the new one.
- 5.2.7 Complete Form EPIPF-RET-09-01, logging the date and time changed, notes as to its condition (e.g., tampered with, sign defaced, missing, etc.). Take a reading with the micro-rem meter and record.
- 5.2.8 After all TLDs have been replaced, return to the plant.

5.3 TLD Dose Determination

- 5.3.1 Ship all environmental TLDs, spiked TLDs, and control TLDs to the vendor.
- 5.3.2 Once the TLD dose report is received back from the vendor, prepare a report of gamma dose by TLD location and micro-R per hour readings at the same location. Also determine from all results obtained:
 - a. Average corrected gamma reading for each EPZ sector.
 - b. Highest corrected gamma reading for each EPZ sector.
- 5.3.3 Based on previously available environmental TLD readings at these locations, calculate a net dose attributable to the release of radioactivity from the plant.
- 5.3.4 Route all results to the Superintendent - Plant Radiation Protection. These results will be factored in with existing land use census data from REMM 2.4.1.b and population distribution data from the Emergency Plan, Appendix C, to determine total population dose.

6.0 **Final Conditions**

- 6.1 None

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7.0 References

7.1 WPSC Electrical Distribution and Engineering Department drawings:

7.1.1 E-131-2, Two Rivers Rural Primary District

7.1.2 E-134, Kewaunee Rural Primary District

7.1.3 E-134-2, Kewaunee Rural Primary District

7.1.4 F-1036, City of Kewaunee, Kewaunee Urban Primary District

7.2 EPIP Appendix B, Forms

7.3 HP-03.010, Area Monitoring Program (TLD)

8.0 Records

8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

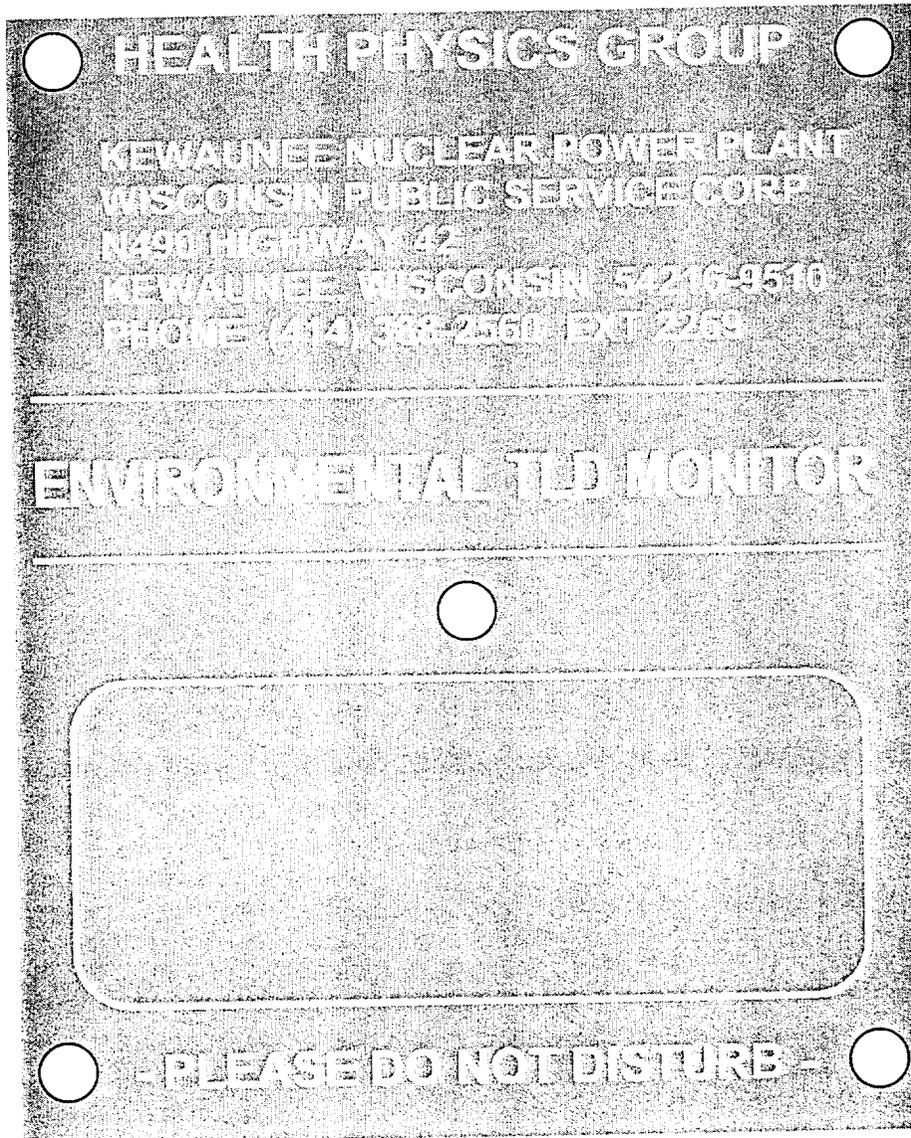
8.1.1 QA Records

- Environmental TLD Record Sheet, Form EPIPF-RET-09-01

8.1.2 Non-QA Records

None

- Environmental TLD Sign
- Actual Size 3" x 4"
- Green with White Lettering



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Reviewed By <i>Mona Smith</i>		Approved By <i>David R. Seebart</i>	
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

1.0 Purpose

- 1.1 This procedure provides instruction for establishing the controls and documentation for changes to equipment or systems necessary during a declared emergency.
- 1.2 This procedure applies to the Engineering Coordinator and other Technical Support Center (TSC) staff members designated by the Technical Support Center Director (TSCD) or Engineering Coordinator implementing physical changes or major equipment or system repairs during a declared emergency.

2.0 General Notes

- 2.1 10CFR50.54 (x) and (y) provide that a licensee may take reasonable action that departs from a license condition or a technical specification in an emergency when this action is immediately needed to protect the public health and safety and no action consistent with license conditions and technical specifications that can provide adequate or equivalent protection is immediately apparent. This action shall be approved, as a minimum, by a licensed senior operator prior to taking the action.

3.0 Precautions and Limitations

- 3.1 None

4.0 Initial Conditions

- 4.1 Plant is in a declared emergency with the Technical Support Center activated.

5.0 Procedure

Note

Normal plant procedures should be used, if time and conditions permit.

- 5.1 Initiation and Implementation of an Emergency Physical Change (EPC)
 - 5.1.1 Complete EPC Request (**Form EPIPF-TSC-04-01**).
 - 5.1.2 Complete an EPC Safety Review (**Form EPIPF-TSC-04-02**).
 - 5.1.3 Assign a number to the EPC from the EPC Index (**Form EPIPF-TSC-04-03**).

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- 5.1.4 Review the EPC with the TSCD, OR
IF the EPC affects plant safety, THEN call the Emergency Directors together for an Emergency PORC Meeting.
- 5.1.5 Following the TSCD or PORC review, ensure all signatures are obtained and dated on the EPC.
- 5.1.6 Ensure all appropriate prints are clearly marked with the needed modifications and copies are made for distribution to the Technical Support Center (TSC), Control Room (CR), and Operational Support Facility (OSF).
- 5.1.7 Review the EPC with the Event Operations Director and Shift Supervisor.
- a. Determine that plant conditions are acceptable prior to allowing the installation of the EPC.
- Note**
For some changes, a DANGER tag is inappropriate and cannot be placed, and therefore, is not required. This should be noted on the EPC Form.
- b. Ensure a tagout is prepared for the conditions necessary for installation of the EPC.
 - c. Ensure the tagout number is recorded on the EPC.
 - d. Have the Shift Supervisor sign the EPC.
 - e. Ensure the original EPC is filed in the Shift Supervisor's office.
- 5.1.8 Coordinate with the Support Activities Director to install the EPC in accordance with the applicable Work Request.

5.2 Closing Out an EPC

- 5.2.1 Upon closeout or entry into the recovery phase, the TSCD will:
- a. Review the EPC Index and initiate NAD-04.03 as applicable for all EPCs that have not been removed, OR
 - b. Remove the EPC if no longer needed.

6.0 Final Conditions

- 6.1 Plant Emergency has been Terminated or Recovery actions have begun and the Emergency Response Manager has suspended the use of EPIPs.

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7.0 References

- 7.1 NAD-04.03, Plant Physical Change
- 7.2 NAD-12.22, Physical Change Procedures
- 7.3 EPIP Appendix B, Forms
- 7.4 COMTRAK 87-153
- 7.5 GNP-04.03.01, Guide to Safety Review, Safety Evaluations, and Second Level Reviews
- 7.6 GNP-04.03.03, Plant Physical Change Control

8.0 Records

8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

- Emergency Physical Change Request, Form EPIPF-TSC-04-01
- Emergency Physical Change Safety Review, Form EPIPF-TSC-04-02

8.1.2 Non-QA Records

- Emergency Physical Change Index, Form EPIPF-TSC-04-03

EMERGENCY PHYSICAL CHANGE REQUEST

NO. _____

1.0 DESCRIPTION OF CHANGE _____

2.0 REFERENCE DRAWINGS _____

3.0 REASON FOR CHANGE _____

4.0 SPECIAL PRECAUTIONS _____

5.0 ESTIMATED DURATION OF EMERGENCY PHYSICAL CHANGE _____

Requested By (Originator) _____ Date _____

6.0 REVIEWED BY (TSCD) _____ Date _____

Approved by (Emergency Director) _____ Date _____

7.0 INITIAL DISTRIBUTION: Orig. (EOD), Copy 1 (SAD), Copy 2 (TSCD), Copy 3 (Plt File)

TAGOUT NO. _____

8.0 INSTALLATION

Install. allowed by (Shift Supv.) _____ Date _____

Installed by _____ Date _____

Ind. Verification _____ Date _____

9.0 REMOVAL

Removal allowed by (Shift Supv.) _____ Date _____

Removed by _____ Date _____

Ind. Verification _____ Date _____

10.0 NOTIFY EMERGENCY DIRECTOR OF REMOVAL _____

(Shift Supv./Date)

11.0 REVIEW

Assistant Manager Kewaunee Plant - Operations _____ Date _____

12.0 FINAL DISTRIBUTION:

Original (QA File)

Copy 1 (Superintendent - Plant Operations)

Copy 2 (Superintendent - Nuclear Training)

Copy 3 (Manager - Quality Programs)

Copy 4 (Assistant Manager Kewaunee Plant - Operations)

Copy 5 (Manager - Engineering and Technical Support)

EMERGENCY PHYSICAL CHANGE SAFETY REVIEW

Emergency Physical Change No. _____

Description _____

1. Does the proposed change constitute a change in the facility as described in the USAR or conduct a test or experiment not described in the USAR?

YES _____ NO _____

a. IF the answer to Question 1 is YES, THEN complete a **Safety Evaluation Report** from GNP-04.03.01. Attach the completed form and basis to this documentation package.

2. Is the proposed change in conflict with Plant Technical Specifications?

YES _____ NO _____

Note

IF NRC approval is required but the change is needed immediately to place the reactor in a safe condition or prevent a radiological release, THEN the provisions of 10CFR50.54(x) can be implemented.

a. IF the answer to Question 2 is YES, THEN NRC approval of a license amendment application, per NEP-05.01, is required prior to implementing the change.

Delineate your reasoning below. Include enough detail to adequately illustrate that the change does not introduce an Unreviewed Safety Question.

Originator _____ Date _____

Reviewed by TSCD _____ Date _____

Approved by Emergency Director _____ Date _____

EMERGENCY PHYSICAL CHANGE INDEX

Control Number	Short Title	Date Approved	Date Installed	Initials	Date Removed or NAD-04.03 Initiated	Initials
EPC-1						
EPC-2						
EPC-3						
EPC-4						
EPC-5						
EPC-6						
EPC-7						
EPC-8						
EPC-9						
EPC-10						
EPC-11						
EPC-12						
EPC-13						
EPC-14						
EPC-15						
EPC-16						
EPC-17						
EPC-18						
EPC-19						
EPC-20						
EPC-21						
EPC-22						