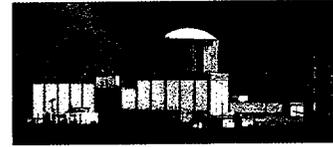




Kewaunee Nuclear Power Plant
N490, State Highway 42
Kewaunee, WI 54216-9511
920-388-2560

Operated by
Nuclear Management Company, LLC



August 28, 2001

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, attached is the latest revisions to the Kewaunee Nuclear Power Plant Radiological Emergency Response Plan Implementing Procedures (EPIPs). 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 "T. Webb", written over a horizontal line.

Thomas J. Webb
Site Licensing Director

SLC

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.

A045

KEWAUNEE NUCLEAR POWER PLANT

August 28, 2001

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

RETURN TO DIANE FENCL - KNPP

OUTSIDE AGENCY COPIES (1-20)

T. Webb - NRC Document Control Desk (1)*	Bill Yarosz - Wisconsin Electric Power Co. (10)*
T. Webb - NRC Region III (2 & 3)*	Craig Weiss - Wisconsin Power & Light (11)*
T. Webb - NRC Resident Inspector (4) (receives Appx. A phone numbers)*	
T. Webb - State of Wisconsin (5)*	Jim Holthaus - Nuclear Management Company (12)*
T. Webb - KNPP QA Vault w/NRC Letter (15)*	

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

J. Bennett (33)	D. Mielke (35)	H. Kocourek (13)	K. Hoops (28)
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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, 66, 67, 68, 70, 72, 73, 74)
L. Welch - Fuel Services (65)	STF Library (43)
NO Library - KNPP (59)	Resource Center (82, 89, 94, 131)
C. Sternitzky - ATF-2 (44)	D. Schrank - Maintenance Off. (41)
D. Braun - ATF-3 (45)	D. Krall - CR/SS Office (51, 56)
P. Ehlen - I&C Office (42)	P&FS Adm - GB-D2 (Nuclear Library) (84)
M. Daron - Security Building (46)	H. Kocourek - TSC (50)
P&FS Adm - GB D2-3 (EOF) (81)	W. Galarneau - RAF (53)
H. Kocourek - OSF (52)	W. Galarneau - SBF/EMT (54)
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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.

W. Galarneau - RAF/RPO (106, 107)	D. Krall - CR/Communicator (116)(Partial Distribution)
W. Galarneau - SBF/ENV (108, 109)	Simulator/Communicator (117)
W. Galarneau - SBF/EM Team (110, 111, 111A)	J. Fletcher - Security (121)
W. Galarneau - Aurora Medical Center (118, 119)	N. Deda - Security Building (120)
W. Flint - Cold Chem/HR Sample Room (113)	S. VanderBloomen (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.**

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EPIP-AD-01	Personnel Response to the Plant Emergency Siren	G	06-05-2001
EPIP-AD-02	Emergency Class Determination	AA	06-19-2001
EPIP-AD-03	KNPP Response to an Unusual Event	AB	03-20-2001
EPIP-AD-04	KNPP Response to Alert or Higher	AC	03-20-2001
EP-AD-5	Site Emergency	Deleted	04-27-87
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	C	06-05-2001
EP-AD-6	General Emergency	Deleted	04-24-87
EPIP-AD-07	Initial Emergency Notifications	AM	01-30-2001
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EP-AD-13C	Site Evacuation	Deleted	03-01-83
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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
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EPIP-ENV-04C	Ground Deposition Sampling and Analysis	V	09-12-2000
EPIP-ENV-04D	Plume Tracking for Environmental Monitoring Teams	M	09-12-2000
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
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EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
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EPIP-EOF-08	Continuing Emergency Notifications	S	09-26-2000
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EPIP-SEC-03	Personnel Assembly and Accountability	Y	07-05-2001
EPIP-SEC-04	Security Force Actions for Dosimetry Issue	O	02-16-2000
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EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
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EPIP-TSC-07	RV Head Venting Time Calculation	H	03-07-2000
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EPIP-TSC-08B*	STMRLS Computer Program	E	03-07-2000
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* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			
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.			
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RET 2B.4	Containment Stack (Sping Reading)	B	04-16-96
RET 2B.5	Steam Release	C	04-16-96
RET 2B.6	Field Reading (Grab Sample)	A	04-16-96
RET-04-01	SAM-2 Counting Equipment Worksheet	E	06-12-2001
RET 8.3	Hospital Survey 1	Deleted	06-05-2001
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TSC-03-04	Radiation Monitors	H	06-12-2001
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TSC 8A.1	Steam Release Data Sheet (Energy Balance)	G	02-14-95
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TSC 8A.3	Steam Release Data/Calculation Sheet (Open Valve)	D	02-14-95
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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
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TSC 9A.4	Core Damage Based on Activity Ratios	C	02-14-95
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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-SEC-02	Rev.	W
		Title	Security Force Response to Emergencies		
		Date	AUG 28 2001	Page 1 of 14	
Reviewed By <i>Marynette Herndon</i>		Approved By <i>Wk Yarosz</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 Security Force actions in the event of a declared emergency at the Kewaunee Nuclear Power Plant (KNPP).

2.0 General Notes

- 2.1 Attachments A through I for Security Force Members (SFM) will be placed in packets at key locations - CAS, SAS, Captains office, IPO, and Squad Room.

3.0 Precautions and Limitations

- 3.1 IF the plant emergency is caused by a security event, or should a security event occur during a plant emergency, THEN the Contingency Plan and Security Implementing Procedures have priority over the actions in this procedure.
- 3.2 After declaration of a plant emergency, all Security Force Members shall wear dosimetry as directed by EPIP-SEC-04, "Security Force Actions for Dosimetry Issue."
- 3.3 IF the Security Building is declared uninhabitable, THEN ensure an adequate level of security effectiveness is maintained.
- 3.4 Ensure all vehicles designated for off-site use have their gas tanks topped off.

4.0 Initial Conditions

- 4.1 The Security Force shall implement this procedure upon declaration of a plant emergency.

5.0 Procedure

- 5.1 **Site Protection Director (SPD) shall:**
- 5.1.1 **When a siren is sounded**, immediately implement EPIP-SEC-03, "Personnel Assembly and Accountability."
- 5.1.2 For any announced Unusual Event, Alert, Site Emergency, or General Emergency, ensure that the Security Shift Captain has immediately dispatched a Security Force Supervisor to the Control Room to act as a notifier.
- 5.1.3 Contact the Radiation Protection Director (RPD) to obtain information on any controlled or potentially hazardous areas.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-SEC-02	Rev.	W
	Title	Security Force Response to Emergencies		
	Date	AUG 28 2001	Page 2 of 14	

5.1.4 Notify the Support Activities Director (SAD) of the need for any search and rescue operations as determined by personnel accountability.

5.2 IF the event is an Alert or higher, THEN the **Security Shift Captain** shall:

5.2.1 Set up the TLD and dosimeter issue station per EPIP-SEC-04.

- a. Issue dosimetry to all Security Force Members.
- b. Ensure dosimetry is issued to all incoming personnel.

5.2.2 Designate a SFM for response to the public fishing area and any other areas within the site boundary as determined to be necessary. The **designated Officer** shall:

- a. Obtain a TLD or dosimeter.
- b. Obtain the portable bullhorn.
- c. Obtain a vehicle.
- d. Inform the people at the public fishing area and other members of the general public found on-site that they must leave the area by using the following statement:

NO OTHER INFORMATION SHOULD BE GIVEN BEYOND THE SCOPE OF THIS STATEMENT.

“The plant site has been temporarily closed and you are requested to leave. Please do so at this time.”

- e. Inform KNPP contracted workers on-site and outside of the protected area of the emergency level declared and to report to the Security Building or the Simulator Training Building for assembly.
- f. Make a tour of the following areas as necessary to ensure all personnel are responding to the emergency siren:

- Met Towers
- Sewage Treatment Plant
- Warehouse 1
- Substation (external)

5.2.3 Call in additional Security Force Members as necessary to augment the normal shift complement.

5.2.4 IF plant personnel are to be evacuated per EPIP-SEC-05, “Personnel Evacuation,” THEN assist in the evacuation.

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5.2.5 Divide ingress into the plant according to the following:

5.2.5.1 Until radiological conditions prohibit, the following personnel (Priority 1) shall proceed directly to the Security Building and will be expedited into the plant ahead of other Emergency Response Organization (ERO) personnel using appropriate latitude allowed by the Security Manual (i.e., 10CFR50.54 x and y).

- a. Fire Team Members listed in EPIP-APPX-A-02
- b. All directors and alternates listed in EPIP-APPX-A-02
- c. Notifiers and communicators as listed in EPIP-APPX-A-02
- d. NRC Resident Inspector

5.2.5.2 Until radiological conditions prohibit, all ERO personnel arriving from off-site shall proceed directly to the Security Building. Entry into the plant shall follow normal entry procedures, except all Priority 1 personnel shall be expedited past other personnel.

Note

IF off-site non-WPSC emergency assistance (i.e., ambulance driver) arrives on-site, THEN they should be expedited into the plant.

5.2.5.3 IF any personnel who are not emergency responders are found or arrive on-site, THEN inform them to leave the site per Step 5.2.2.d or report to an assembly area per Step 5.2.2.e. Members of the media should be directed to Green Bay and given (920) 433-1400 or (800) 838-6192 to call for information.

5.2.6 IF the SPD requests site boundary control to be established further out than the Protected Area (PA) boundary, THEN proceed as follows:

5.2.6.1 Establish new boundaries.

5.2.6.2 IF any public roads are within the boundaries, THEN contact the appropriate County Sheriffs' Department for assistance.

5.2.6.3 Establish where dosimetry should be issued and turned in.

5.2.6.4 Establish recommended traffic flow into and out of the new controlled area.

5.2.6.5 Special consideration is appropriate for Priority 1 personnel responding to a pager activation.

5.2.6.6 Establish roadblocks with appropriate traffic flow directions USING DESIGNATED SFMs AS APPROPRIATE.

5.2.6.7 Move dosimetry issue in a coordinated effort with the roadblocks.

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5.2.6.8 Personnel identification at roadblocks shall be accomplished by using Plant Access lists, personal recognition, plant key card, or other picture I.D., as appropriate.

5.2.7 IF the Security Building is declared uninhabitable, THEN proceed as follows:

5.2.7.1 Security Operational and Administrative functions shall be moved to and directed from another location chosen in conjunction with the SPD, Emergency Director (ED), and RPD.

5.2.7.2 The Security Shift Captain shall designate a SFM to obtain the following items for transport to the location chosen in Step 5.2.7.1:

- a. Emergency key cards
- b. Keys for the SAS and Armory
- c. All additional security portable radios, spare batteries, and chargers
- d. Necessary Contingency Equipment

5.2.7.3 Direct Central Alarm Station (CAS) to take over all security functions normally considered primary Secondary Alarm Station (SAS) functions and CAS shall disable SAS.

6.0 Final Conditions

6.1 None

7.0 References

- 7.1 EPIP-AD-07, Initial Emergency Notifications
- 7.2 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.3 EPIP-SEC-04, Security Force Actions for Dosimetry Issue
- 7.4 EPIP-SEC-05, Personnel Evacuation
- 7.5 NAD-02.10, Responsibilities Under a Fire Emergency

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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

SHIFT CAPTAIN

**** On the Emergency/Drill Siren, evaluate the situation to ensure we are NOT in a Contingency Event.**

1. Obtain an EPIPs, binder the FFD clipboard, ensure you take the portable phone, obtain fit for duty keys from SAS and turn on intoxilizer, then go to the Visitor/Vehicle desk.

Note: Have the first Non-Emergency Response Person (badged person only) take over dosimetry issue at the entrance turnstile area.

- When the event requires Fire Brigade, you should assume the Lane Search Duties (see Attachment H) and send that Officer to clear the site as stated in EPIP-SEC-02 Step 5.2.2.
2. Ensure accountability is being performed (SMS Emergency Program started), document start and completion of initial accountability.
 3. Ensure no tours are being suspended via R-3 Officer.
 4. Ensure TLD Station is set up at entrance turnstile area.
 5. Ensure the site is clear of the Public (Fishermen, etc.) and gas tanks are filled on three (3) WPS Vans used. The extra keys are in SAS. Notify the Kewaunee Sheriff when OCA clearing problems exist.
 6. Conduct accountability on any Visitors on-site. (EPIP-SEC-03 Step 5.2.3)
 7. Give safe route (with SPD/RPD guidance) map to all persons exiting the site.
 8. Collect TLD SRD as Personnel exit the turnstile (when leaving site).

(Use Laminated Map Located in the Binder.)

“Update Security Force Members as to the current/changing conditions as often as possible.”

CAS OPERATOR

** On the Emergency/Drill Siren, evaluate all of your SMS and CCTV equipment to ensure we are NOT in a Contingency Event.

***Note: All Security tours and alarm response shall be conducted by R-3 until additional support arrives.**

1. Start the Emergency Accountability Program on the SMS (begin emergency) no earlier than two minutes after the siren has sounded.
2. WHEN the program is started, print an Emergency Report to ensure program is operational.
3. WHEN the program operation is confirmed, make the following announcement over the Gai-tronics:

“Attention all personnel. Emergency accountability has been initiated. All badged personnel who are assembled shall swipe their key card in the SMS Accountability Card Reader NOW. Any personnel NOT in an assembly area should ensure their Supervisor or Director is informed of their status.”

4. Conduct a radio check with all Security Personnel to ensure accountability of Security Force.
5. Notify the Shift Captain of your results.
6. Document all Gai-tronics announcements on a paper other than the CAS Activity Log (CAL).

SAS OPERATOR

**** On the Emergency/Drill Siren, evaluate all of your SMS and CCTV equipment to ensure we are NOT in a Security Event.**

Note: All Security tours and alarm response shall be conducted by R-3 until additional support arrives.

1. Obtain a list of Accountability Area Coordinators (See Attachment).
2. Call in one person for each area and circle the name of the person contacted.

Note: During normal business hours, call them on the Gai-tronics to ensure they assume their duties.

3. Help the Accountability Coordinator when a person is unaccounted for (i.e., Run report on the person who is unaccounted for).
4. Continue to monitor all SMS And CCTV equipment to ensure Security is maintained.
5. Ten minutes after the Emergency Accountability Program has been started, print Emergency Report and forward the report to the MAC.
6. Support additional report requests from the MAC.

FIELD SUPERVISOR

**** On the Emergency/Drill Siren, evaluate the situation to ensure we are NOT in a Contingency Event.**

1. Respond to the Control Room.
2. Start Notifier Duties.
3. When relieved, report to the Shift Captain.

RESPONSE OFFICER R-1

- ** **On the Emergency/Drill Siren, evaluate the situation to ensure we are NOT in a Contingency Event.**
 - ** **When the event requires Fire Brigade Members, you shall respond as a Fire Brigade Member.**
1. Stop at HP, pickup **All Security Personnel TLDs** (Security Personnel have "RED" dynotape), give R-3 the TLDs for Security Personnel stationed in the Power Block.
 2. Take remaining TLDs to the Security Building.
 3. Obtain the bull horn from the Captain's Office.
 4. Obtain keys for a vehicle.
 5. Ensure gas tanks are full - the three WPS Vans used for Emergency (the extra keys are in SAS).
 6. Notify the Captain you are about to implement EPIP-SEC-02 Step 5.2.2, Clear the OCA.
 - * **When clearing the OCA, this includes All Non-Emergency Personnel (Fishermen, Media, Sight-seers).**

"The plant site has been temporarily closed and you are requested to leave. Please do so at this time."

- * Anyone requesting additional information can be given to the public information Hotline #1-800-838-6192.
7. Advise the Captain when complete and when you encounter non-compliance problems.
 8. Report back to IPO and resume tour duties. Notify SAS and Captain that you are resuming your P.O. Duties.

COMPENSATORY - OFFICER R-2

- ** On the Emergency/Drill Siren, evaluate the situation to ensure we are NOT in a Security Event.**
 - ** When posted for compensatory reasons, remain posted unless health conditions arise, then leave the area and report your situation to the Shift Captain.**
 - ** When the event requires Fire Brigade Members, you shall respond as a Fire Brigade Member.**
1. Call CAS for tour/other assignments.

INTERIOR PATROL OFFICER R-3

**** On the Emergency/Drill Siren, evaluate the situation to ensure we are NOT in a Contingency Event.**

1. Remain in the Plant as the Response Officer.
2. Pick up dosimetry for self, CAS, and Notifier (Field Supervisor).
3. Evaluate per schedule what tours need to be completed.
4. Notify Captain (Ext. 8292) when the potential exists that a tour cannot be completed.
5. Conduct all scheduled tours, P.O. - F.C. - R.O., until relief arrives.
6. Respond to all pids and door alarms.
7. Listen to Gai-tronics announcements indicating hazardous areas. Avoid those areas and report to the Captain.
8. When relief arrives, give turn over as to hazardous areas and status of tours.

LANE SEARCH - OFFICER R-4

- ** **On the Emergency/Drill Siren, evaluate the situation to ensure we are NOT in a Security Event.**
 - ** **During events that require Fire Brigade Response, you shall be relieved by the Shift Captain and you shall assume the duties of R-1 (See Attachment G). When complete, return to Lane Search.**
1. Control access through search equipment. Ensure only Emergency Response Personnel are allowed on-site. All others shall be told to report to Classroom "C" upstairs. (Ask All Personnel if they are an ERO Member.)
 2. Set up ribbon to route Personnel to table in front turnstile for dosimetry issue (ribbon found under x-ray podium).
 3. Set up dosimetry table and equipment stored under x-ray podium for incoming Personnel to use.

PROTECTED AREA OFFICER R-5

- ** **On the Emergency/Drill Siren, evaluate the situation to ensure we are NOT in a Security Event.**
- ** **When the event requires Fire Brigade Members or when R-2 is posted, you shall also assume the duties of R-2 (See Attachment F).**
 - Support the MAC (see Emergency Plan EPIP-SEC-03 Step 5.2)