

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



Operated by Nuclear Management Company, LLC

September 10, 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,

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.
OA Vault, w/attach.

R045

KEWAUNEE NUCLEAR POWER PLANT

September 10, 2001

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

RETURN TO DIANE FENCL - KNPP

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W. Galarneau - SBF/ENV (108, 109)

W. Galarneau - SBF/EM Team (110, 111, 111A) W. Galarneau - Aurora Medical Center (118, 119)

W. Flint - Cold Chem/HR Sample Room (113)

N. Deda - SBF/SEC (114)

D. Krall - CR/Communicator (116)(Partial Distribution)

Simulator/Communicator (117)

J. Fletcher - Security (121)

N. Deda - Security Building (120)

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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.

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KEWAUNEE NUCLEAR POWER PLANT REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES September 10, 2001

Please follow the directions listed below. If you have any questions regarding changes made to the EPIPs, please contact Dave Seebart at ext. 8719. If you are a controlled copy holder (see cover page), return this page to Diane Fencl by October 10, 2001, SIGNED AND DATED to serve as a record of revision.

EPIP Index, dated 09-10-2001.

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-01	G	EPIP-AD-01	Н
EPIP-SEC-03	Y	EPIP-SEC-03	Z

I CERTIFY Copy No (WPSC No.) of the Kewaunee Nuclear Power Plant's EPIPs has been updated.		
SIGNATURE	DATE	
Please return this sheet to DIANE FENCL.		

C.X.S. for Diane Fenci

Enclosure

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WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-AD-01	Rev. H
Kewaunee Nuclear Power Plant		Personnel Response to Emergency Siren	the Plant
Emergency Plan Implementing Procedure	Date	SEP 1 0 2001	Page 1 of 3
Reviewed By Janus M. Ferris	 Approve	d By Willow M.B.	artetro
Nuclear Safety PORC Review Related No Required		☐ Yes ☐ No ☐ SRO Approval ☐ Temporary ☐ Changes Requi	⊔ Yes

1.0 Purpose

1.1 This procedure provides instruction for defining the initial actions to be taken in the event the plant emergency siren is sounded.

2.0 General Notes

- 2.1 The applicable content of this procedure shall be general knowledge for all personnel badged for unescorted access to KNPP.
- 2.2 <u>WHEN</u> responding to an emergency, <u>IF</u> roadblocks are in place in the Emergency Planning Zone (EPZ), be prepared to show a picture I.D. and follow access instructions given by the Traffic Officer.

3.0 Precautions and Limitations

- 3.1 <u>IF</u> approached by the media, <u>THEN</u> refer them to the telephone response center at 433-1400 or 1-(800)-838-6192 and tell them that this is their most accurate source for information.
- 3.2 ONLY the scheduled Control Room staff, individuals specifically called to the Control Room (CR) by the ED or EOD, and the following individuals may report directly to the Control Room:
 - Emergency Director (ED)
 - Event Operations Director (EOD)
 - CR Communicator (CRCM)
 - Notifier (SEC-N)
 - NRC Communicator (NRCCM)
 - Control Room Support (SP-C)
 - NRC Resident Inspector
 - CAS Operator
 - Shift Technical Advisor (STA)
- 3.3 <u>IF</u> no Accountability Coordinator (AC) is available in the Assembly Area, <u>THEN</u> one of the first ERO members to arrive should implement Section 5.3 of EPIP-SEC-03 until relieved by a designated Accountability Coordinator.

WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-AD-01	Rev. H
Kewaunee Nuclear Power Plant	Title	Personnel Response to the Plant Emergency Siren	
Emergency Plan Implementing Procedure	Date	SEP 1 0 2001	Page 2 of 3

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 Manager (SM) or Emergency Director.

5.0 Procedure

- When personnel within the Site Boundary hear the emergency siren, they shall respond as follows:
 - 5.1.1 Emergency Response Organization (ERO) staff shall report to their duty locations.
 - a. ERO personnel inside the Radiologically Controlled Area (RCA) should pass through the RCA access point near the Radiation Protection Office (RPO) on their way to their emergency duty location.
 - b. ERO personnel who need to pass through the Security Building en-route to their emergency duty location should do so promptly unless instructed to assemble elsewhere by Security.
 - c. The following are exceptions for ERO members reporting to identified duty locations:
 - Fire Brigade/Fire Team report to the Shift Manager (SM) or Event Operations Director (EOD)
 - On-Shift NAOs report to the SM or EOD
 - Security Force personnel report to the Shift Captain
 - Dispatched emergency teams such as search and rescue or repair teams report to the SM or Support Activities Director (SAD)
 - 5.1.2 Visitors, contractors, and non-ERO personnel on-site should assemble in the nearest designated Assembly Area.
 - a. <u>IF</u> inside the Protected Area (PA), <u>THEN</u> report to one of the following areas:
 - Radiation Protection Office (RPO)
 - Administrative Training Facility (ATF) Lunchroom
 - Warehouse Annex Lunchroom
 - CAF Break Room
 - b. IF outside the PA, THEN report to one of the following areas:
 - Security Building Classroom C
 - Simulator Training Facility (STF) Lobby
 - SGR FAB Shop

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- 5.2 Upon hearing the siren, report personal observations as follows:
 - 5.2.1 Immediately report any injury or accident to the Radiological Protection Director (RPD) or HP Technician on duty (if there is no RPD) and obtain first aid treatment as directed.
 - The First Aid Attendant should report the injury and injured person(s) status to the RPD or Shift Manager (if there is no RPD) (i.e., treatment, departure from site, destination, prognosis, and return to site).
 - 5.2.3 Problems needing corrective maintenance action should be immediately reported to a Supervisor.
- 5.3 When an evacuation is implemented, follow the instructions provided by Security and:
 - a. Exit the plant in an orderly fashion by the directed route.
 - b. <u>IF</u> reporting to a designated county relocation area, proceed directly there, following all directions that may be provided for exiting the Emergency Planning Zone (EPZ) by county emergency government officials.

6.0 Final Conditions

Plant Emergency has been Terminated or Recovery actions have begun and the Emergency Response Manager has suspended the use of EPIPs or it has been determined that accountability is no longer required.

7.0 References

7.1 EPIP-SEC-03, Personnel Assembly and Accountability

8.0 Records

- 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 OA Records

None

8.1.2 Non-OA Records

None

				
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Nuclear Safety Related PORC Review Required		Yes Temp	Approval Of porary ges Required	□ Yes ☑ No

1.0 Purpose

1.1 This procedure provides instruction for establishing and maintaining personnel accountability within the Protected Area (PA) of the plant.

2.0 General Notes

- When initial assembly and accountability are in progress, certain individuals (as designated in EPIP-AD-01) will be allowed to move in, out, and about the PA before initial accountability is complete.
- 2.2 Emergency Response Organization (ERO) staff shall report to their duty locations.
- 2.3 Visitors, Contractors, and non-ERO personnel on-site should assemble in the nearest designated Assembly Area.

2.4 Severe Weather

- 2.4.1 Several of the Assembly Areas are <u>NOT</u> appropriate for severe weather safety.
 - a. Warehouse Annex Lunchroom relocate to the locker room.
 - b. Administrative Training Facility (ATF) Lunchroom relocate to the ATF Basement.
 - c. Simulator Training Facility (STF) Lobby relocate to the Simulator Control Room away from the glass partition along the west wall close to the floor.
 - d. Classroom C Security Building relocate to the Security Building locker room.

Note

<u>IF</u> unable to relocate as stated above, personnel should relocate on lower levels of buildings in interior rooms away from all windows.

- 2.4.2 The following locations are adequate during severe weather:
 - a. Control Room (CR)
 - b. Radiation Protection Office (RPO)
 - c. Technical Support Center (TSC)

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3.0 Precautions and Limitations

- 3.1 Initial accountability starts from the site announcement (siren sounding/public address message) and needs to be completed within 30 minutes.
 - a. The SMS Emergency Accountability **Program will begin 2 minutes** after site announcement. This allows for personnel to exit areas that are not their normal emergency work area (i.e., Control Room).
 - b. The first report should be generated after 5 minutes.
 - c. After 10 minutes, print a report or review the computer screen every minute until the number of unaccounted for personnel plateaus.
 - d. When the number of unaccounted for personnel plateaus, accountability is complete.
- 3.2 Allow <u>prompt</u> movement of ERO personnel into and out of the Protected Area when the Site Protection Director has determined there is no personnel hazard restricting such movement.
- 3.3 Adhere to the radiation control policies and requirements outlined in EPIP-AD-11, "Emergency Radiation Controls" and EPIP-RET-02D, "Emergency Radiation Entry Controls and Implementation."
- Personnel who are in the Control Room when the Emergency Accountability Program is started are accounted for by the SMS.
- 3.5 Security Force Members, Fire Brigade Members, NAOs, and dispatched Emergency Teams are exempt from the SMS Emergency Accountability Program. They will be accounted for as defined in EPIP-AD-01, Step 5.1.1.c.

4.0 Initial Conditions

4.1 Personnel assembly is required whenever the plant emergency siren is sounded.

Accountability will be required upon assembly unless otherwise directed by the Shift Manager/Emergency Director.

5.0 Procedure

- 5.1 Site Protection Director (SPD) or Designee shall:
 - 5.1.1 <u>IF</u> a designated Master Accountability Coordinator (MAC) is not available, <u>THEN</u> direct the Security Shift Captain to perform accountability functions.
 - 5.1.2 Contact the Emergency Director (ED) or Radiological Protection Director (RPD) to determine the location of any personnel hazards on-site or off-site and continue to monitor conditions.

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- 5.1.3 <u>IF</u> conditions warrant, <u>THEN</u> direct the Security Force to hold exiting personnel in the Security Building until the RPD determines a safe evacuation route.
- 5.1.4 Advise the MAC of all hazardous areas and/or severe weather.
- 5.1.5 Advise on-site directors of hazardous areas or severe weather conditions.
- 5.1.6 Direct Security Force personnel to make a tour through the Owner Controlled Area (OCA), sewage plant, exterior warehouses, exterior substation, and Met Tower to inform personnel to assemble in the STF or Security Building, or to leave the site, as appropriate.
- 5.1.7 Ensure attempts are made by any available means to contact all personnel who are unaccounted for.
- 5.1.8 <u>IF</u> attempts fail to locate personnel who are unaccounted for, <u>THEN</u> direct the Central Alarm Station (CAS) or Secondary Alarm Station (SAS) operator to run a computer report for that person(s).
- 5.1.9 Provide the Support Activities Director (SAD) and the RPD with information regarding all personnel who are unaccounted for based upon last known locations obtained from the computer report.
- 5.1.10 Keep the ED informed of the status of personnel accountability.
- 5.1.11 When initial accountability is complete, ensure the following message is announced over the Gai-tronics:

"Attention all personnel. Initial accountability is complete. Personnel may relocate to other areas but shall maintain accountability."

- 5.1.12 Maintain cognizance of all personnel outside the PA who remain on-site.
- 5.1.13 Continue to provide the MAC with updates on any location determined to be a personnel hazard including areas outside the PA.

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5.2 Master Accountability Coordinator (MAC) shall:

- 5.2.1 <u>WHEN</u> accountability is required:
 - a. Report to the Security Building.
 - b. IF a MAC has been designated and UNTIL they are released,
 - 1. If appropriate, plan a shift relief per EPIP-AD-05
 - 2. Help the designated MAC
 - c. <u>IF</u> a MAC has <u>NOT</u> been designated, notify the SPD of your intent to assume the responsibilities of the MAC and continue implementation of this procedure.
- 5.2.2 Two minutes after the sound of the plant emergency siren, ensure that the SAS/CAS has started the "Emergency Accountability Program" on the SMS.
- 5.2.3 Contact Security to verify there is <u>NOT</u> a hard copy visitor list. If this list is available, pick up the KNPP Protected Area Visitor and Non-Designated Vehicle log (SIP 20.02-1) at the Registration Desk.
- 5.2.4 Contact each Visitor's Escort via Gai-tronics to ensure accountability of their Visitor, place a check mark next to the Visitor's name as reported by the Escort.
- 5.2.5 Five minutes after the SMS Emergency Program has been started, obtain an Emergency Report from CAS/SAS.
- 5.2.6 Should attempts fail to locate personnel who are unaccounted for, direct the SAS/CAS to run a computer report on that person.
- 5.2.7 Review the Emergency Report
 - a. Contact the Control Room and strike any names from the list that have been positively accounted for (individual is in the Control Room or is accounted for on their "Emergency Accountability Log").
 - b. Contact the Technical Support Center (TSC) and strike any names from the list that have been positively accounted for (individual is in the TSC or is accounted for on their "Emergency Accountability Log").
 - c. Contact all names remaining on the list by any possible means.
- 5.2.8 WHEN all personnel have been contacted or reasonable attempts to contact have failed, record the names of individuals not accounted for and their last known location and provide this information to the SPD.
- 5.2.9 Contact the Accountability Areas outside the PA (per Table 1) to determine the number and location of personnel on-site but not within the Protected Area.

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- 5.2.10 Report to the SPD the number and location of personnel on-site but outside the PA and obtain an update regarding personnel hazards and/or severe weather.
- 5.2.11 <u>IF</u> the plant emergency siren sounds after initial accountability, <u>THEN</u> return to Step 5.2.2.
- 5.2.12 Provide Accountability Coordinators (AC) with information regarding personnel hazards and/or severe weather provided by the SPD and continue to do so on a periodic basis.
- 5.2.13 Brief the SPD on any change in accountability status or new problems (i.e., groups or individuals overdue in assembly areas).
- 5.2.14 If appropriate, plan a shift relief for the MAC per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."
- 5.2.15 IF Final Conditions (Section 6.0) have NOT been met, THEN return to Step 5.2.11.
- 5.2.16 WHEN Final Conditions (Section 6.0) are met,
 - a. Return your work area to normal status and return emergency procedures, forms, etc. to there proper place.
 - b. Record any discrepancies to emergency supplies that need correction and report them to the SPD.
 - c. Collect all completed forms, notes, and other documentation and give them to the SPD.

5.3 Accountability Coordinator (AC) shall:

- 5.3.1 <u>WHEN</u> accountability is required:
 - a. Report to your assigned assembly area.
 - b. IF an AC has been designated and UNTIL they are released,
 - 1. Help in facility activation.
 - 2. If appropriate, plan a shift relief per EPIP-AD-05.
 - 3. Help the designated AC.
 - c. <u>IF</u> an AC has <u>NOT</u> been designated, notify the Facility Director or MAC of your intent to assume the responsibilities of the AC in the assembly area and continue implementation of this procedure.

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- 5.3.2 Obtain Accountability packet located in the assembly areas in the following locations:
 - a. Control Room (CR) on the wall behind the Control Room Supervisor's desk.

Note

Make a list for the MAC of Fire Brigade Members, NAOs, and dispatched Emergency Teams that are accountability exempt.

- b. Technical Support Center (TSC) On the desk near the entrance door (No. 410).
- c. Radiation Protection Office (RPO) Next to the entrance door (No. 55).
- d. Administrative Training Facility (ATF) Lunchroom southwest corner, above the phone and Gai-tronics.
- e. Warehouse Annex Lunchroom west wall, above the phone and Gai-tronics.
- f. Security Building Room "C" on the wall by the phone and Gai-tronics.
- g. Site Training Facility (STF) Lobby on the wall by the Gai-tronics.
- h. Containment Access Facility Break Room Next to phone on east wall of Craft Break Area.
- i. SGR Fab Shop Next to phone on south wall of SGR Fab Shop.
- 5.3.3 Locate yourself near the SMS accountability card reader.

Note

Visitors with magnetic badges <u>must</u> swipe their key card in an accountability card reader. Visitors with non-magnetic badges should <u>not</u> swipe their key card in an accountability card reader.

- 5.3.4 <u>WHEN</u> the Gai-tronics announcement is made that emergency accountability has been initiated, ensure that all badged personnel located in the area swipe their Security key card in the accountability reader and receive a green light.
- 5.3.5 <u>IF</u> a Director or Supervisor notifies you of individuals who will <u>NOT</u> assemble, <u>THEN</u> record them as if they were leaving the facility per Step 5.3.9.
- 5.3.6 Five minutes after the Gai-tronics announcement initiating accountability, make an announcement requesting any badged personnel who have not swiped their key card to do so immediately.
- 5.3.7 During accountability, demand quiet and cooperation. Maintain accountability of personnel assembled there.

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- 5.3.8 WHEN provided by the MAC, inform personnel in your assembly area of information on hazardous areas.
- 5.3.9 <u>WHEN</u> an individual elects to move to another area, log their departure on "Emergency Accountability Log," Form EPIPF-SEC-03-01, as follows:

Note

This includes visitors also.

- a. In the "Name" column: Enter the name of the individual leaving the area.
- b. In the "Card" column: Enter the individual's security card number.
- c. In the "Destination" column: Enter the location to which the individual is heading.

Acronym	Area		
	For Another Accountability Area		
CR	Control Room		
RPO	Radiation Protection Office		
TSC	Technical Support Center		
WA	Warehouse Annex Lunchroom		
ATF	ATF Administrative Training Facility Lunchroom		
CAF	CAF Containment Access Facility Break Room		
	For Repair Team Activity		
LPA	LPA Leaving the Protected Area		
PA	PA Outside the Buildings but inside the Protected Area		
ADMN	Administrative Buildings		
TURB	Turbine Building		
AUX	Auxiliary Building		
CNTM	Containment Building		
WRHS	Warehouse or Shop Area		

- d. In the "Departure Time" column: Enter the time the individual departed the
- e. In the "Return/Arrive Time" column: Enter the time the individual returns to the area or the time you are informed they arrive at another Assembly Area by the Accountability Coordinator in that area.

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- 5.3.10 IF an individual arrives in your area who did not log out of your area and is not immediately returning to the area he checked out of, <u>THEN</u> contact the area he departed and notify them of the individual's arrival time and intent to stay.
- 5.3.11 <u>IF</u> moving the entire group of assembled personnel to another area, <u>THEN</u>:
 - a. Contact the MAC to inform them of the intended move.
 - b. Take a head count of the total number of people moving.
 - c. Instruct personnel in your area to proceed <u>directly</u> to the new destination, staying in a group until head count can be verified.
 - d. Verify the head count upon arrival at the new location.
 - e. Contact the MAC to verify arrival and to provide a phone number at the new location.
- 5.3.12 <u>IF</u> the plant siren is sounded following the initial accountability, <u>THEN</u> initiate contacts to all individuals listed as <u>NOT</u> "Returned or Arrived" on your Form EPIPF-SEC-03-01:
 - a. <u>WHEN</u> contacted, give them any information you know about the siren sounding.
 - b. <u>IF</u> instructed by a Facility Director, instruct the individual to come back to an assembly area.
 - c. Note the individuals that were contacted and notify the MAC of individuals logged out of your area and whether you were able to contact them.
 - d. Return to Step 5.3.4.
- 5.3.13 If appropriate, plan a shift relief for the area AC per EPIP-AD-05.
- 5.3.14 IF Final Conditions (Section 6.0) have not been met, <u>THEN</u> return to Step 5.3.8.
- 5.3.15 <u>IF</u> Final Conditions (Section 6.0) are met, <u>THEN</u>

Note

Flag any discrepancies to emergency supplies that need correction.

- a. Return your work area to normal status and return emergency procedures, forms, etc. to there proper place.
- b. Collect all completed forms, notes, and other documentation and give them to the SPD.

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5.4 Security Force shall:

- 5.4.1 WHEN accountability is required and the SMS system is offline, manually maintain a log of personnel entering/exiting the PA to enable the MAC to update the accountability roster as necessary.
- 5.4.2 Guide PA ingress/exit in accordance with EPIP-SEC-02, "Security Force Response to Emergencies."

5.4.3 **Patrolling Security Officers** shall:

- a. Verify their locations by portable radio to the Shift Captain for accountability.
- b. Obtain personal dosimetry to take with them on patrol in accordance with EPIP-SEC-04, "Security Force Actions for Dosimetry Issue."

6.0 Final Conditions

Plant Emergency has been Terminated or Recovery actions have begun and the Emergency Director has suspended the use of EPIPs or it has been determined emergency accountability is no longer required.

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-AD-01, Plant Personnel Response to an Emergency
- 7.3 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.4 EPIP-AD-11, Emergency Radiation Controls
- 7.5 EPIP-RET-02D, Emergency Radiation Entry Controls and Implementation

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8.0 Records

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 OA Records

None

8.1.2 Non-QA Records

• Emergency Accountability Log, Form EPIPF-SEC-03-01

ACCOUNTABILITY AREAS (Inside the Protected Area)

LOCATION	PHONE NUMBER	
Control Room	8207	
Radiation Protection Office	8451	
Technical Support Center (Included OSF and RAF)	8353	
Administrative Training Facility (Lunchroom)	6480	
Warehouse Annex (Lunchroom)	6452	
Containment Access Facility Break Room	6500	

ALTERNATE LOCATION	PHONE NUMBER
Administrative Training Facility (Basement)	6548
Warehouse Annex (Locker Room)	8427

ACCOUNTABILITY AREAS (Outside the Protected Area)

LOCATION	PHONE NUMBER
Security Building Classroom C	6548
Simulator Training Facility (Lobby)	8427
SGR - Fab Shop	6501

ALTERNATE LOCATION	PHONE NUMBER
Security Locker Room (Security Building)	8292
Simulator Training Facility (Simulator Control Room)	8427

ACCOUNTABILITY LEADERS

LEAD	ER	PHONE NUMBER
Master Accountability Coordinator (Security Building)		8509
Site Protection Director	(Sec. Bldg.)	8418
	(TSC)	PBX 8591 Kew. Ex. 388-0459

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