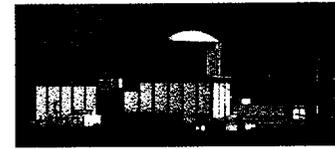




Kewaunee Nuclear Power Plant
 N490, State Highway 42
 Kewaunee, WI 54216-9511
 920-388-2560



Operated by
 Nuclear Management Company, LLC

September 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 (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,

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

September 27, 2001

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

RETURN TO DIANE FENCL - KNPP

OUTSIDE AGENCY COPIES (1-20)

J. 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)
D. Masarik (32)	D. Seebart (24)	B. Bartelme (34)	

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)
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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)
C. Hutter - ATF-1 (64)	T. Schmidli - RPO (55)

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.**

**KEWAUNEE NUCLEAR POWER PLANT
 REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES
 September 27, 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 29, 2001, SIGNED AND DATED to serve as a record of revision.

EPIP Index, dated 09-27-2001.

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-11	P	EPIP-AD-11	Q
EPIP-EOF-03	Z	EPIP-EOF-03	AA
EPIP-EOF-04	AF	EPIP-EOF-04	AG
EPIP-OSF-03	N	EPIP-OSF-03	O
Figure EPIPTG-EOF-12-02	A	Figure EPIPTG-EOF-12-02 (file after EPIP-EOF-12)	B
EP-FIG-026	A	Figure EPIPTG-SEC-05-01 (filed after EPIP-SEC-05)	B
EPIP-APPX-A-03	BM	EPIP-APPX-A-03	BN
EPIP FORM TSC 2.1	N	Form EPIPF-TSC-02-01	O

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. R. S. for
 Diane Fencl

Enclosure

EMERGENCY PLAN IMPLEMENTING PROCEDURES

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EP-AD			
EPIP-AD-01	Personnel Response to the Plant Emergency Siren	H	09-10-2001
EPIP-AD-02	Emergency Class Determination	AB	09-18-2001
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
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	Q	09-27-2001
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	O	06-05-2001
EPIP-AD-19	Protective Action Guidelines	P	10-31-2000

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EP-ENV			
EPIP-ENV-01	Environmental Monitoring Group Organization and Responsibilities	U	10-31-2000
EPIP-ENV-02	Environmental Monitoring Team Activation	W	06-15-2000
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
EPIP-ENV-04B	Air Sampling and Analysis	V	09-12-2000
EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
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
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

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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
EP-EOF			
EP-EOF-1	Corporate Emergency Response Organization	Deleted	03-11-94
EPIP-EOF-2	Emergency Operations Facility (EOF) Activation	X	10-24-2000
EPIP-EOF-03	EOF Staff Action for Unusual Event	AA	09-27-2001
EPIP-EOF-04	EOF Staff Action for Alert or Higher	AG	09-27-2001
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
EPIP-EOF-08	Continuing Emergency Notifications	S	09-26-2000
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
EPIP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center Security	P	07-19-2001

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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
EPIP-OSF-03	Work Requests During an Emergency	O	09-27-2001
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
EPIP-OSF-04	Search and Rescue	D	09-12-2000
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EPIP-RET-02	In-Plant Radiation Emergency Team	S	06-05-2001
EPIP-RET-02A	RPO - RAF Activation	R	06-05-2001
EP-RET-2B	Gaseous Effluent Sample and Analysis	Q	03-03-98
EP-RET-2C	Containment Air Sampling and Analysis	Deleted	03-01-83
EPIP-RET-02D	Emergency Radiation Entry Controls and Implementation	M	06-12-2001
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

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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
EPIP-RET-04	SBF Activation	Q	06-12-2001
EP-RET-4A	EOF Radiological Monitoring	Deleted	03-10-83
EPIP-RET-04A	SBF Operation/Relocation	D	06-12-2001
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
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EP-RET-6	Dose Projection	Deleted	04-24-87
EP-RET-7	Radiological Analysis Facility/Radiation Protection Office Communications	Deleted	04-24-87
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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EP-SEC-1	Security Organization	Deleted	04-24-87
EPIP-SEC-02	Security Force Response to Emergencies	W	08-28-2001
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EPIP-SEC-03	Personnel Assembly and Accountability	Z	09-10-2001
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
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EPIP-TSC-03	Plant Status Procedure	U	06-12-2001
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			
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	I	03-20-2001

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EPIP-APPX-A-06	EP-FIG-005	APPX-A-06-02	Site Boundary Facility - KNP Floor Plan	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-008	APPX-A-06-01	Radiological Analysis Facility - KNP Floor Plan	A	10-31-2000
EPIP-EOF-12 Form EPIPF-EOF-02-01	EP-FIG-009	EOF-12-01	Division Office Building (2nd Floor) Floor Plan	B	10-24-2000
EPIP-APPX-A-06	EP-FIG-012	APPX-A-06-08	State/County Work Area - WPSC D2-1 Floor Plan	C	10-31-2000
EPIP-APPX-A-06	EP-FIG-013	APPX-A-06-09	NRC Work Area - WPSC D2-4 Floor Plan	A	10-31-2000
EPIP-AD-19	EP-FIG-014	AD-19-01	Population Distribution by Geographical Sub-Areas (with sectors)	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-022	APPX-A-06-04	EOF - WPSC D2-3 Floor Plan	B	10-31-2000
EPIP-EOF-12	EP-FIG-024	EOF-12-02	Map - Location of JPIC, MBC, GOB, DOB, etc.	B	09-27-2001
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APPX-A-6	EP-FIG-037	---	Floor Plan - Corporate Response Center	DEL	08-04-98
APPX-A-6	EP-FIG-038	---	Floor Plan - JPIC	DEL	08-04-98
EP-OSF-2	EP-FIG-039		High Priority Work	ORIG	07-08-98
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EPIP-APPX-A-06	EP-FIG-044	APPX-A-06-07	JPIC - State and County Work Area - WPSC D2-8	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-045	APPX-A-06-05	JPIC - Utility Work Area - WPSC D2-7	A	10-31-2000
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EPIP-APPX-A-02	---	APPX-A-02-01	ERO Call Tree	A	01-30-2001

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EPIP-APPX-A-02	Response Personnel Call List	BK	07-19-2001
EPIP-APPX-A-03	Off-Site Telephone Numbers	BN	09-27-2001
EPIP-APPX-A-06	WPSC Emergency Response Telephone Numbers	Y	07-30-2001

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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
EP-ENV			
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ENV-01-03	Meteorological and Plant Status Data	B	10-31-2000
ENV-01-04	EMT Orders/Field Data	B	10-31-2000
ENV-02-01	EMT Activation Checklist	M	06-15-2000
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EOF-02-02	EOF Deactivation Checklist	K	10-24-2000
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-12-01	I.D. Badge Registration Form	G	10-24-2000
EP-OSF			
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OSF-03-01	Operational Support Facility Team Briefing	B	09-12-2000

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RET 2B.2	Auxiliary Building Stack (Grab Sample)	C	04-16-96
RET 2B.3	Auxiliary Building Stack (Sping Reading)	C	04-16-96
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
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			
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EP-TSC			
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TSC 1.3	Severe Accident Management – Status	A	04-01-99
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TSC-03-01	Plant System Status	L	06-12-2001
TSC-03-02	Plant Equipment Status	L	06-12-2001
TSC-03-03	Environmental Status Board	J	06-12-2001
TSC-03-04	Radiation Monitors	H	06-12-2001
TSC-04-01	Emergency Physical Change Request	F	08-29-2000
TSC-04-02	Emergency Physical Change Safety Review	F	08-29-2000
TSC-04-03	Emergency Physical Change Index	F	08-29-2000
TSC-07-01	Head Venting Calculation	F	10-31-2000
TSC 8A.1	Steam Release Data Sheet (Energy Balance)	G	02-14-95
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.		No.	EPIP-AD-11	Rev.	Q
Kewaunee Nuclear Power Plant		Title	Emergency Radiation Controls		
<i>Emergency Plan Implementing Procedure</i>		Date	SEP 27 2001	Page 1 of 7	
Reviewed By <i>David R Seebart</i>		Approved By <i>W. L. 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 maintaining exposure to emergency workers As Low As Reasonably Achievable (ALARA).

2.0 General Notes

2.1 Definitions

- 1.1 FEMA - Federal Emergency Management Agency
- 2.1.2 HP - Health Physics
- 2.1.3 PA - Protected Area
- 2.1.4 RCA - Radiologically Controlled Area

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 Manager or Emergency Director.

5.0 Procedure

- 5.1 **All emergency personnel** are responsible for adhering to the requirements of this procedure.
- 5.1.1 The requirements of the Health Physics Procedure Manual shall be applicable during all radiological emergencies, except as authorized by the Radiological Protection Director (RPD) or Emergency Director (ED).
- 5.1.2 For RCA entries, if any 10CFR20 dose limit is likely to be exceeded, an "Emergency Radiation Work Permit" (ERWP), Form EPIPF-AD-11-01, shall be completed. Otherwise, use an existing Radiation Work Permit (RWP) or fill out a RWP in accordance with NAD-08.03, "Radiation Work Permit."

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- 5.1.3 A PRIORITY ENTRY can be used for quick action to expedite the entry of emergency response personnel into the RCA in accordance with EPIP-RET-02D, "Emergency Radiation Entry Controls and Implementation."
- 5.1.4 For any entry where an exposure greater than 10CFR20 dose limits is likely, an Authorization For Increased Radiation Exposure (Form HPF-120) shall be completed in accordance with HP-01.003, "Administrative Exposure Control." All exposures which could exceed 10CFR20 dose limits shall be approved by the ED.

10CFR20 RADIATION DOSE LIMITS

TEDE, ADULT	ANNUAL	5 REM
TODE, ADULT	ANNUAL	50 REM
LDE, ADULT	ANNUAL	15 REM
SDE, SKIN, ADULT	ANNUAL	50 REM
SDE, EXTREMITY, ADULT	ANNUAL	50 REM
DAC-HOUR, ADULT	ANNUAL	2,000 DAC-HOURS

TABLE 2-2 EPA RADIATION DOSE GUIDELINES (EPA-400)		
Projected Dose (rem) to Emergency Team Workers	Action/Condition	Comments
TEDE < 5 rem All Other Organs < 50 rem TODE	Control exposure of emergency workers to these levels except for those instances listed below. (Appropriate controls for emergency workers include time limitations, respirators, and stable iodine.)	"All Other Organs" include: Skin Extremities and Thyroid. Stable iodine may be made available for use where predicted doses exceed 25 rem to the thyroid. Although respirators and stable iodine should be used where effective to control dose to emergency team workers, thyroid dose may not be a limiting factor for lifesaving missions. For Environmental/Monitoring Teams, refer to RASCAL "Maximum Doses at Selected Distances" output screen. Check bone, lung, and thyroid doses.
TEDE < 10 rem All Other Organs < 100 rem TODE	Emergency workers' exposure should be controlled below these levels when their mission involves protecting valuable property.	
TEDE < 25 rem All Other Organs < 250 rem TODE	Emergency workers' exposure should be controlled below these levels when their mission involves life saving or protection of large populations.	
TEDE > 25 rem All Other Organs > 250 rem TODE	Exposures above these levels to emergency workers will be on a voluntary basis only to persons fully aware of the risks involved.	

- 5.2 The **Emergency Director (ED)** is responsible for approving all requests for exposure in excess of 10CFR20 dose limits.
- 5.3 The **Radiological Protection Director (RPD)** has the overall responsibility for in-plant personnel monitoring and shall:
- 5.3.1 Evaluate any potential exposure to radiation in excess of 10CFR20 dose limits for approval by the ED (Form HPF-110) in accordance with HP-05.001, "Survey and Sampling Techniques." In the absence of the RPD, the ED may authorize an overexposure after concurrence of the on-shift HP or an In-plant Radiation Emergency Team (IRET) member.

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5.3.2 In accordance with EPIP-AD-18, "Potassium Iodide Distribution," advise the ED on the need to make thyroid blocking agent (Potassium Iodide, a stable iodine) available to Emergency Response Organization (ERO) members who may be subject to radioiodine intake.

5.3.3 Review all RWPs and ERWPs in use.

5.3.4 Establish control over radiation, high radiation or contamination areas discovered outside the normal RCA when levels are found to exceed the following:

- 2 mr/hr Direct Radiation
- 2,000 DPM/100 cm² Beta-Gamma
- 200 DPM/100 cm² Alpha

5.3.4.1 This control may include:

- a. Roping off and posting additional areas within the plant
- b. Roping off and posting all doors to an entire building
- c. Designating and posting the entire PA as RCA
- d. Establishing roadblocks in conjunction with the ED and Site Protection Director (SPD), and designating the entire area within the roadblocks as RCA

Note

Emergency response personnel reporting to the plant shall NOT be required to initial their RWP prior to RCA entry when the RCA is expanded. The RWP shall be initialed prior to making entries at the Radiation Protection Office (RPO) or Radiological Access Facility (RAF). See EPIP-AD-11, Part 5.1, for Emergency RWP (ERWP) requirements.

5.4 The **In-Plant Radiation Emergency Team (IRET)** is responsible for performing those activities necessary to implement the purpose of this procedure.

5.4.1 Make radiological assessments of all in-plant areas requiring access during an emergency.

5.4.2 Report in-plant radiological conditions to the RPD.

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- 5.4.3 Determine the projected amount of time in-plant emergency workers will be allowed to remain in any radiation/contaminated area through pre-entry review of:
- Projected route exposures
 - Measured dose rates and airborne concentrations
 - Personnel exposure history
 - Projected duration of task
 - Information on current plant conditions and the plant area under consideration
- 5.4.4 Provide radiation monitoring coverage for all continuously occupied areas.
- 5.4.5 Perform air sample surveys and direct radiation surveys as directed.
- 5.4.6 Control exposure to airborne radionuclides in accordance with the following:
- Use only Self-Contained Breathing Apparatus (SCBA) pressure demand respirators when entering areas of unknown airborne concentrations.
 - Limit airborne particulate exposures to < 200 DAC-HOURS to the maximum extent possible.
 - Remove any worker from further emergency duties upon exceeding 2,000 DAC-HOURS.
 - Assess internal dose by performing whole body counts in accordance with procedure HP-03.008, "Evaluation of Inhalations or Ingestions."

Note

For entry teams originating from the Operational Support Facility (OSF), document the items below (Steps 5.4.7.a. through Step 5.4.7.h.) on Form EPIPF-OSF-03-01.

- 5.4.7 Review all planned entries with the entry team members and discuss the following:
- Potential stress conditions and problems
 - Work methods, work location, and description of task
 - Number of personnel required and access routes inside the RCA
 - Allowable exposure limits, expected doses, stay times
 - Tools, equipment, and parts
 - Lighting
 - Communications requirements
 - Abort instructions

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- 5.4.8 As directed, accompany any worker entering an area where radiological conditions are unknown.
- 5.4.9 Remove any individual who has exceeded 10CFR20 dose limits from work involving additional radiation exposure. The worker's exposure record shall be reviewed by the RPD and ED prior to further radiation work. Any further radiation work must be authorized by the ED.
- 5.4.10 As directed, store samples collected post accident in designated storage locations. Liquid, air particulate, and halogen filter samples should be stored in the radioactive waste storage areas of the Auxiliary Building. At the Site Boundary Facility (SBF), shielded drums are available for storage of environmental samples.

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 EIPs.

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 NUREG-0654/FEMA-REP-1, REV. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants (Nov. 1980)
- 7.3 EPA-400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (Oct. 1991)
- 7.4 10CFR20, Code of Federal Regulations
- 7.5 Kewaunee Nuclear Power Plant Health Physics Procedure Manual
- 7.6 KNPP Commitment Tracking System number 97-125, NRC Inspection Report 97-13, Repair Personnel
- 7.7 Implementing Procedures
- 7.7.1 EPIP-RET-02D, Emergency Radiation Entry Controls and Implementation
- 7.7.2 NAD-08.03, Radiation Work Permit
- 7.7.3 EPIP-AD-18, Potassium Iodide Distribution
- 7.7.4 EPIP Appendix B, Forms
- 7.7.5 HP-03.008, Evaluation of Inhalations or Ingestions

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7.7.6 HP-01.003, Administrative Exposure Control

7.7.7 HP-05.001, Survey and Sampling Techniques

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 Radiation Work Permit, Form EPIPF-AD-11-01

8.1.2 Non-QA Records

None

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Reviewed By <i>David R Seebart</i>		Approved By <i>Whelan</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 Emergency Response Manager and other initial response personnel for an appropriate response to an **Unusual Event** at the Emergency Operations Facility (EOF).

2.0 General Notes

- 2.1 At the Unusual Event level, radio-pager activation will be performed by Control Room personnel for all designated emergency response directors (primary and alternate).
- 2.2 IF notified by radio-pager and the message is NOT understood, THEN emergency response personnel should confirm contact by telephoning Meridian Mail at 1-800-236-1588. A Meridian Mail voice message will indicate that the radio-pager activation was for an **actual** declared emergency and NOT a drill or exercise.
- 2.3 IF approached by the media during a declared emergency, THEN refer them to the Telephone Response Center at **920-433-1400** or **1-800-838-6192** and tell them that this is their most accurate source for information.

3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07-01 should be initiated and in progress to state and local emergency governments within 15 minutes of the emergency level being declared or as soon as possible without further compromise to plant or public safety.
- 3.2 The Emergency Response Manager has the non-delegable responsibility for making protective action recommendations.
- 3.3 IF an emergency class escalation occurs during implementation of this procedure, THEN proceed immediately to EPIP-EOF-04, "Corporate Action for Alert or Higher."
- 3.4 Only the following personnel may authorize support personnel, without Kewaunee I.D. cards, access to the EOF during a declared emergency:
- 3.4.1 Emergency Response Manager (ERM)
 - 3.4.2 Administrative Logistics Directors (ALD)
 - 3.4.3 Environmental Protection Director (EPD)

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4.0 Initial Conditions

- 4.1 This procedure shall be implemented upon declaration of an **Unusual Event** or when directed by the Emergency Response Manager.

5.0 Procedure

Note

It is the ERM's responsibility to provide overall direction and coordination of the KNPP emergency response activities, make protective action recommendations to government authorities, coordinate efforts with external organizations (governmental, industry, vendors, etc.), and support the plant's efforts to mitigate the accident by ensuring continuity of resources for long-term operation of the emergency response organization.

- 5.1 **Emergency Response Manager (ERM)** shall:

- 5.1.1 WHEN notified that an Emergency has been declared:

- a. Report to the Emergency Operations Facility.
- b. IF an Emergency Response Manager has been designated, until released, THEN:
 1. If appropriate, plan a shift relief per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."
 2. Assist the designated Emergency Response Manager.
- c. IF an Emergency Response Manager has NOT been designated, THEN assume the responsibilities of the Emergency Response Manager and continue implementation of this procedure.

- 5.1.2 Notify the Emergency Director of your arrival and assumption of the Emergency Response Manager duties.

Note

Consider calling in a State Radiological Coordinator Liaison (SRCL).

- 5.1.3 Verify the Environment Protection Director (EPD) is prepared to transmit radiological related data and general plant conditions to the State Radiological Coordinator in the State Emergency Operations Center (Madison) and/or man the HPN phone in the event they may be required.

- 5.1.4 IF director(s) are NOT arriving at the EOF in a reasonable amount of time, THEN instruct the ALD to contact the individuals needed by telephone and/or by individual radio-pager codes (per EPIP-AD-07, "Initial Emergency Notifications").

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5.1.5 IF a director position cannot be filled, THEN assign the director's duties to another director's position.

Note

The EOF can be activated for individual functions, i.e., off-site notifications without full activation of the facility.

5.1.6 Direct the Administrative Logistics Director (ALD) to contact the appropriate WPSC support personnel to inform them that their assistance is or may be needed.

5.1.7 Direct the ALD to complete activation of the EOF appropriate to the nature of the event in accordance with EPIP-EOF-02, "Emergency Operations Facility (EOF) Activation."

5.1.8 Direct the Environmental Protection Director (EPD) to contact the appropriate Environmental Monitoring Team Personnel with instructions to standby for a possible call in.

5.1.9 Establish communications with the Technical Support Center and Control Room through the Darome Conference System.

5.1.10 Verify the status of off-site agency communications that have taken place from the Control Room.

Note

The appropriate Government Agency contacts for the ERM are:

- *State of Wisconsin - Office in Charge (OIC) @ Dial Select 83 or 608-242-3260/3261*
- *Kewaunee County - Emergency Government (Director) @ Dial Select 43 or 920-487-5257*
- *Manitowoc County - Emergency Management Director @ Dial Select 53 or 920-683-4916/4918*

5.1.11 WHEN confirmed that the EOF is capable of assuming off-site notification,

- a. Assume the responsibility for off-site notification.
- b. Inform the ED of the transfer of this responsibility.
- c. Contact the State and County EOCs (if active) and notify them that the EOF has the responsibility for off-site communications.

5.1.12 Contact and notify the NPID of the EOF activation status.

5.1.13 Ensure the WPSC Nuclear Emergency Public Information Plan is being implemented for an Unusual Event.

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5.1.14 Review requirements for escalation, termination, and recovery situations with the Emergency Director (per EPIP-AD-02, "Emergency Class Determination").

Note

Off-site protective actions for the public are NOT required for Unusual Events.

5.1.15 As required, instruct the Environmental Protection Director to review off-site dose measurements and projections to ensure the event classification is appropriate.

5.1.16 IF time permits, THEN contact off-site authorities via the Dial Select to discuss potential changes in classification and/or appropriate PAR.

5.1.17 IF notified by the ED of any change in EALs (event escalation), THEN go to EPIP-EOF-04.

5.1.18 WHEN contacted or periodically provide off-site authorities with the following (Dial Select is the preferred communication link):

- Available information on the event status using "Plant Emergency Status Report," Form EPIPF-EOF-08-05, as a guide
- Feedback that verifies and that clarifies the off-site authorities information
- Information on the nature and direction of the event

5.1.19 Contact the ED periodically to receive an update on:

- Status of the plant
- Material and personnel support requirements
- On-site or off-site radiological releases, potential releases, and release paths
- Priorities of tasks to minimize the impact of the accident on the public
- Incidents of public interest (i.e., fires, spills, personnel contamination/injury)

5.1.20 Periodically inform the ED of:

- State and County priorities
- State and County actions (i.e., protective actions, evacuations, traffic control, etc.)
- State and County areas of concern
- Media areas of interest and any misinterpretations of the plant situation

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5.1.21 Determine the EOF priorities, evaluate activities in the following areas:

- Logistical requirements to mitigate significant plant evolutions
- Off-site consequences
- Protective action recommendations

5.1.22 Brief the EOF Emergency Response Organization periodically.

5.1.23 Ensure that the Spokesperson is informed.

a. Forward plant status and public interest information to the Spokesperson for appropriate use in briefings to the:

- Public
- Media
- WPSR Senior Management
- Partners
- Other financial stakeholders in KNPP or WPSR

b. Review press releases.

c. Review press conferences.

d. Inform the Spokesperson of any factual errors or ambiguities in the press releases or conferences.

5.1.24 If appropriate, plan for a shift relief per EPIP-AD-05.

5.1.25 If plant conditions meet the requirements of Section 5.1 of EPIP-AD-15, "Recovery Planning and Termination," recovery activities or termination can be implemented in accordance with EPIP-AD-15.

5.1.26 IF Final Conditions are NOT met (Step 6.0), THEN return to Step 5.1.11.

5.1.27 WHEN Final Conditions are met (Step 6.0):

a. IF plant conditions degrade to where the declaration of a higher emergency level is declared or full activation of the EOF is appropriate, THEN implement EPIP-EOF-04.

b. IF termination is declared or plant conditions meet the requirements for plant recovery, THEN the ERM shall ensure the following actions are taken:

1. Ensure that termination or plant recovery Event Notifications has been completed in accordance with EPIP-AD-07.

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2. Verify that all off-site agencies and support groups who were initially notified were informed of the Unusual Event termination or plant recovery.
3. Ensure each director notifies the personnel he has previously placed on standby.
4. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
5. Collect all completed records, logs, forms, notes, and other documentation and give them to the ALD.
6. Schedule a self-critique with all event participants in the EOF (all shifts) as soon as practical. The procedure, EPMP-02.04, "Drill/Exercise Critique and Assessment," should be used as a guide.

5.2 **Administrative Logistics Director (ALD) shall:**

5.2.1 WHEN notified that an emergency has been declared,

- a. Report to the Emergency Operations Facility immediately.
- b. IF an Administrative Logistics Director has been designated, until released, THEN:
 1. If appropriate, plan a shift relief per EPIP-AD-05.
 2. Assist the designated Administrative Logistics Director.
- c. IF an Administrative Logistics Director has NOT been designated, THEN assume the responsibilities of the Administrative Logistics Director and continue implementation of this procedure.

5.2.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Administrative Logistics Director.

5.2.3 As directed by the ERM:

- a. Contact the EOF support personnel or others.
- b. Instruct them to report to the EOF immediately, remain on standby for further instructions.

5.2.4 Complete activation of the EOF appropriate to the nature of the event in accordance with EPIP-EOF-02.

5.2.5 As needed, assign EOF support personnel.

5.2.6 Establish procedures for the long-term storage of the documents, records, and logs generated by the plant.

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5.2.7 Ensure that appropriate logs, records, and documents, as directed below, are maintained for the duration of the event. Those logs, records, and documents shall include, but NOT be limited to,

- Ongoing plant status and conditions
- Date and time of significant accident events
- Chronology of plant accident mitigation and repair priorities
- All calculated, measured, or state provided radiological release data and information
- All event notification and status update documents generated
- Any messages generated or recorded
- All Honeywell computer printouts generated for status board maintenance or general information
- All logs maintained by EOF directors
- All News statements from the JPIC

5.2.8 Monitor the flow of information in the EOF and correct any problems.

5.2.9 If required, arrange for communication system service repair (See EPIP-EOF-02, Step 5.1.3).

5.2.10 If required, obtain purchasing support (see EPIP-APPX-A-03 for WPSC contact) for assistance in the following:

- Material purchase and control contract negotiations
- Administering the petty cash fund, expense accounts, and handling payroll matters

5.2.11 If needed, provide for the following manpower needs:

- Technical and craft disciplines through organizations such as Westinghouse Electric Corporation, Fluor Engineering, INPO
- If needed, arrange for labor relations assistance

5.2.12 If needed, obtain the following logistical assistance for:

- Transportation of emergency response personnel
- Airline and hotel accommodations
- Office supplies and furniture

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- Document reproduction
- Food deliveries
- Sanitation

5.2.13 Periodically contact any EOF staff members on standby and update them on the event status.

5.2.14 If appropriate, plan for a shift relief per EPIP-AD-05.

5.2.15 IF Final Conditions are NOT met (Step 6.0), THEN return to Step 5.2.5.

5.2.16 WHEN Final Conditions are met (Step 6.0),

- a. IF plant conditions degrade to where the declaration of a higher emergency level is warranted or full activation of the EOF is appropriate, THEN implement EPIP-EOF-04.
- b. IF termination is declared or plant conditions meet the requirements for plant recovery, THEN the ALD shall ensure the following actions are taken:
 1. Contact any EOF staff members on standby and notify them of the change in event status.
 2. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 3. Collect all completed records, logs, forms, notes, and other documentation as described in EPMP-02.01, "Declared Emergency Evaluation and Documentation."
 4. Ensure "EOF Deactivation Checklist," Form EPIPF-EOF-02.02, is completed per EPIP-EOF-02.

5.3 Environmental Protection Director (EPD) shall:

5.3.1 WHEN notified that an emergency has been declared:

- a. Report to the Emergency Operations Facility.
- b. IF an Environmental Protection Director has been designated, until released, THEN:
 1. If appropriate, plan a shift relief per EPIP-AD-05.
 2. Assist the designated Environmental Protection Director.
- c. IF an Environmental Protection Director has NOT been designated, THEN assume the responsibilities of the Environmental Protection Director and continue implementation of this procedure.

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- 5.3.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Environmental Protection Director.
- 5.3.3 IF directed by the ERM, THEN contact the environmental team organization and instruct them to standby for possible call in.
- 5.3.4 Maintain an overall awareness of environmental consequences and the contributing factors of those consequences.
- 5.3.5 As necessary, establish and maintain communication with other Emergency Response Organization Directors and Off-Site Authorities.
- 5.3.6 Periodically contact Environmental staff members on standby and update them on the event status.
- 5.3.7 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.3.8 IF Final Conditions (Step 6.0) are not met, THEN return to Step 5.3.4.
- 5.3.9 WHEN Final Conditions are met (Step 6.0),
- a. IF plant conditions degrade to where the declaration of a higher emergency level is declared or full activation of the EOF is appropriate, THEN implement EPIP-EOF-04.
 - b. IF termination is declared or plant conditions meet the requirements for plant recovery, THEN the EPD shall ensure the following actions are taken:
 1. Contact any Environmental staff members on standby and notify them of the change in event status.
 2. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 3. Collect all completed records, logs, forms, notes, and other documentation and give them to the ALD.
 4. Schedule a self-critique with all event participants in the Environmental Group (all shifts) as soon as practical. The procedure "Drill/Exercise Critique and Assessment," EPMP-02.04, should be used as a guide.

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5.4 **State Radiological Coordinator Liaison (SRCL) shall:**

5.4.1 WHEN notified that an emergency has been declared,

- a. Report to the Emergency Operations Facility.
- b. IF a State Radiological Coordinator Liaison has been designated, until released, THEN
 1. If appropriate, plan a shift relief per EPIP-AD-05.
 2. Assist the designated State Radiological Coordinator Liaison.
- c. IF a State Radiological Coordinator Liaison has NOT been designated, THEN assume the responsibilities of the State Radiological Coordinator Liaison and continue implementation of this procedure.

5.4.2 Notify the Environmental Protection Director of your assumption of the responsibilities of the State Radiological Coordinator Liaison.

5.4.3 On a continual basis, collect available information using the following forms as a guideline:

- "SRCL Initial Action Checklist," Form EPIPF-EOF-04-01
- "Plant Emergency Status Report," Form EPIPF-EOF-08-05
- "Radiological Status Report," Form EPIPF-EOF-08-06
- Other sources that would provide information to assist the SRC in making decisions concerning public health and safety.

5.4.4 Transmit information to the SRC by phone as promptly as possible.

5.4.5 IF specifically requested by State or County officials, THEN provide written radiological event summaries using "Radiological Status Report," Form EPIPF-EOF-08-06, for transmission to those officials by facsimile.

- a. Complete "Radiological Status Report," Form EPIPF-EOF-08-06.
- b. Forward the completed form to the ERM for approval.
- c. Inform the EPD that you have completed "Radiological Status Report," Form EPIPF-EOF-08-06, to be transmitted by facsimile to State and County officials.

Note

If needed, request an extra SRCL to cover the HPN phone.

5.4.6 Respond to calls from the NRC over the HPN phone.

5.4.7 If appropriate, plan for a shift relief per EPIP-AD-05.

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5.4.8 IF Final Conditions are NOT met (Step 6.0), THEN return to Step 5.4.3.

5.4.9 WHEN Final Conditions are met (Step 6.0),

- a. IF plant conditions degrade to where the declaration of a higher emergency level is declared or full activation of the EOF is appropriate, THEN implement EPIP-EOF-04.
- b. IF termination is declared or plant conditions meet the requirements for plant recovery, THEN the SRCL shall ensure the following actions are taken:
 1. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 2. Collect all completed records, logs, forms, notes, and other documentation and give them to the ALD.

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.
- 6.2 Plant conditions degrade to where the declaration of a higher emergency level is warranted or full activation of the ERO is appropriate.

7.0 References

- 7.1 EPIP-AD-02, Emergency Class Determination
- 7.2 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.3 EPIP-AD-15, Recovery Planning and Termination
- 7.4 EPIP-AD-19, Protective Action Guidelines
- 7.5 EPIP-EOF-02, Emergency Operations Facility (EOF) Activation
- 7.6 EPIP-EOF-04, Corporate Action for Alert or Higher
- 7.7 EPIP-EOF-08, Continuing Emergency Notifications
- 7.8 EPIP-EOF-11, Internal Communication and Documentation Flow
- 7.9 EPIP-APPX-A, Communications
- 7.10 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.11 WPSC Nuclear Emergency Public Information Plan

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- 7.12 EPMP-02.04, Drill/Exercise Critique and Assessment
- 7.13 EPIP-AD-07, Initial Emergency Notifications
- 7.14 Kewaunee Nuclear Power Plant Emergency Plan
- 7.15 NRC Inspection Report K-87-195
- 7.16 COMTRAK 91-187, Item 10
- 7.17 COMTRAK 96-163

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

- Event Notice, Form EPIPF-AD-07-01
- EOF Activation Checklist, Form EPIPF-EOF-02-01
- Plant Emergency Status Report, Form EPIPF-EOF-08-05
- Radiological Status Report, Form EPIPF-EOF-08-06
- SRCL Initial Action Checklist, Form EPIPF-EOF-04-01
- Telephone Communications Log Sheet, Form EPIPF-EOF-04-02

8.1.2 Non-QA Records

None

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	Reviewed By	Approved 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 the Emergency Response Manager and other initial response personnel for an appropriate response to an **Alert, Site Emergency, or General Emergency**, at the Emergency Operations Facility (EOF).

2.0 General Notes

- 2.1 Personnel on-site depart for the EOF promptly through the security building, unless instructed to assemble elsewhere by the Gai-Tronics announcement or security personnel.
- 2.2 IF notified by radio-pager and the message is not understood, THEN emergency response personnel should confirm contact by telephoning Meridian Mail at 1-800-236-1588. A Meridian Mail voice message will indicate that the radio-pager activation was for an **actual** declared emergency and NOT a drill or exercise.
- 2.3 As more information becomes available, initial protective action recommendations should be adjusted in accordance with plant conditions, dose projections, time available to evacuate, estimated evacuation times, and meteorological conditions (EPIP-AD-19).
- 2.4 IF approached by the media during a declared emergency, THEN refer them to the Telephone Response Center at 920-433-1400 or 1-800-838-6192 and tell them that this is their most accurate source for information.

3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07-01, should be initiated and in progress to State and Local Emergency Governments within 15 minutes of the emergency level being declared or as soon as possible without further compromise to plant or public safety.
- 3.2 The Emergency Response Manager has the nondelegable responsibility for making protective action recommendations.
- 3.3 IF an emergency class escalation occurs during implementation of this procedure, THEN immediately reinstate this procedure appropriate to the new emergency level declared.

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3.4 Only the following personnel may authorize support personnel without Kewaunee I.D. cards access to the EOF during a declared emergency:

3.4.1 Emergency Response Manager (ERM)

3.4.2 Administrative/Logistics Director (ALD)

3.4.3 Environmental Protection Director (EPD)

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 Emergency Response Manager.

5.0 Procedure

Note

It is the ERM's responsibility to provide overall direction and coordination of the KNPP emergency response activities, make protective action recommendations to government authorities, coordinate efforts with external organizations (governmental, industry, vendors, etc.), and support the plant's efforts to mitigate the accident by ensuring continuity of resources for long term operation of the emergency response organization.

5.1 **Emergency Response Manager (ERM)** shall:

5.1.1 WHEN notified that an Emergency has been declared,

a. Report to the Emergency Operations Facility.

b. IF an Emergency Response Manager has been designated, until released, THEN:

1. If appropriate, plan a shift relief per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."

2. Assist the designated Emergency Response Manager.

c. IF an Emergency Response Manager has NOT been designated, THEN assume the responsibilities of the Emergency Response Manager or continue implementation of this procedure.

5.1.2 Notify the Emergency Director of your arrival and assumption of the Emergency Response Manager duties.

5.1.3 Verify a State Radiological Coordinator Liaison (SRCL) or the Radiological Protection Director (RPD) is prepared to transmit radiological related data and general plant conditions to the State Radiological Coordinator in the State Emergency Operations Center (Madison).

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- 5.1.4 Verify engineering/licensing and communicator support are available in the EOF.
- 5.1.5 IF director(s) or supporting staff positions are not arriving at the EOF in a reasonable amount of time, THEN instruct the Off-Site Communicator to contact the individuals needed by telephone and/or by individual radio-pager codes.
- 5.1.6 IF a director position cannot be filled, THEN assign that director's duties to another director's position.
- 5.1.7 Ensure the ALD is completing EOF activation in accordance with "Emergency Operations Facility (EOF) Activation," EPIP-EOF-02.
- 5.1.8 Ensure the ALD is establishing security in accordance with "Media Center/Emergency Operation Facility/Joint Public Information Center Security," EPIP-EOF-12.
- 5.1.9 Establish Communications with the Technical Support Center and Control Room through the Darome Conference System.
- 5.1.10 Through the Off-Site Communicator, verify the status of off-site agency communications that have taken place from the Control Room.

Note

The EOF can be activated for individual functions, i.e., off-site notifications prior to full activation of the facility.

- 5.1.11 WHEN confirmed with the Off-Site Communicator that the EOF is capable to assume off-site notification,
 - a. Assume the responsibility for off-site notifications.
 - b. Inform the ED of the transfer of this responsibility.
 - c. Instruct the Off-Site Communicator to contact the State and County EOCs (if active) and notify them that the EOF has the responsibility for off-site communications.
- 5.1.12 Contact and notify the Nuclear Public Information Director (NPID) of the EOF activation status.
- 5.1.13 Ensure the WPSC Nuclear Emergency Public Information Plan is being implemented for the declared emergency.
- 5.1.14 Ensure the EPD is taking steps to perform dose projections and provide assistance in making protective action recommendations.

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5.1.15 Determine the emergency status by obtaining the following information from the emergency response organization in the EOF:

- a. Engineering/Licensing Support
 - Significant plant evolutions
 - NRC response team status and issues
- b. Environmental Protection Director
 - Status of Radiological Effluent Releases (potential off-site dose consequences)
 - Off-Site Dose Assessment Evaluation
 - Status of Environmental Monitoring Teams
 - Potassium Iodide Distribution
 - Adequacy of the Protective Action Recommendations
- c. Administrative Logistics Director
 - EOF Activation and Operational Status (EPIP-EOF-02)
 - EOF/JPIC Security Status (EPIP-EOF-12)
 - Status of ERO response
 - Status of Information flow in the EOF
 - Continuity of resources for long term operation of the emergency response organization
- d. State Radiological Coordinator Liaison
 - Status of communications with the State of Wisconsin, State Radiological Coordinator
- e. Off-Site Communicator
 - Off-Site Communications status
 - Significant State and County concerns, priorities, and actions
 - PAR implementation status
 - State or County requests for "Plant Emergency Status Report," Form EPIPF-EOF-08-05, or other information update

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!! Caution !!

To Prevent Injury or Death

It is NOT required to de-escalate from an Emergency Action Level. Termination or direct entry into recovery is preferable. However, there may be occasions when it is more appropriate to de-escalate.

EPIP-AD-02, "Emergency Class Determination," and other EIPs are NOT written to facilitate de-escalation. Therefore, any decision to de-escalate instead of entering recovery must be based on a thorough review of EPIP-AD-02 and careful use of appropriate procedures.

- 5.1.16 Review requirements for escalation and de-escalation situations with the Emergency Director (EPIP-AD-02).
 - 5.1.17 As required, review the EALs and plant status to ensure the event classification is appropriate (EPIP-AD-02).
- Note**
- Off-site protective actions for the public are NOT required for events classified less than a general emergency.*
- 5.1.18 As required, instruct the Environmental Protection Director to review off-site dose measurements and projections to ensure the event classification is appropriate.
 - 5.1.19 Review current and potential protective action recommendations (EPIP-AD-19).
 - 5.1.20 IF time permits, THEN contact Off-Site Authorities via the Dial Select to discuss potential changes in classification and/or appropriate PAR.
 - 5.1.21 IF notified by the ED of any change in EALs, OR if there is a change in PARs, THEN:
 - a. Ensure, with the assistance of the Engineering/Licensing Support Coordinator, an "Event Notice," Form EPIP-AD-07-01, is complete.
 - b. Review and sign all "Event Notice," Form EPIP-AD-07-01, generated from the EOF.
 - c. Direct the Off-Site Communicator to initiate notifications using the "Event Notice," Form EPIP-AD-07-01.
 - d. Verify that required notifications are made by the Off-Site Communicator (EPIP-AD-07, "Initial Emergency Notification," or EPIP-EOF-08, "Continuing Emergency Notifications").

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Note

The appropriate Government Agency contacts for the ERM are:

- State of Wisconsin - Officer in Charge (OIC) @ Dial Select 83 or 608-242-3260/3261
- Kewaunee County - Emergency Government (Director) @ Dial Select 43 or 920-487-5257
- Manitowoc County - Emergency Management Director @ Dial Select 53 or 920-683-4916/4918

5.1.22 WHEN contacted, or periodically, provide Off-Site Authorities with the following (Dial Select is the preferred communication link):

- a. Available information on the event status using "Plant Emergency Status Report," Form EPIPF-EOF-08-05, as a guide. This data can be provided by the Engineering/Licensing Coordinator.
- b. IF a hard copy of "Plant Emergency Status Report" is specifically requested by State or County Officials, THEN:
 - Direct the Engineering/Licensing Coordinator to provide written plant event summaries using "Plant Emergency Status Report," Form EPIPF-EOF-08-05.
 - Review and approve "Plant Emergency Status Report," Form EPIPF-EOF-08-05.
 - Forward the approved "Plant Emergency Status Report," Form EPIPF-EOF-08-05, to the Off-Site Communicator with direction to fax them to the State and County EOCs.

5.1.23 WHEN a completed "Radiological Status Report," Form EPIPF-EOF-08-06, is received:

- a. Review,
- b. Approve, AND
- c. Return to the SRCL.

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5.1.24 Contact the ED periodically to receive an update on:

- Status of the plant
- Material and Personnel support requirements
- On-site or off-site radiological releases or potential releases and release paths
- Priorities of tasks to minimize the impact of the accident on the public
- Incidents of public interest (i.e., fires, spills, personnel contaminations/injuries)

5.1.25 Periodically inform the ED of:

- State and County priorities
- State and County actions (i.e., protective actions, evacuations, traffic control, etc.)
- State and County areas of concern
- Media areas of interest and any misinterpretations of the plant situation

5.1.26 Determine EOF priorities, evaluate activities in the following areas:

- Logistical requirements to mitigate significant plant evolutions
- Off-site dose consequences
- Protective action recommendations
- Protective actions implemented by the Counties

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5.1.27 Periodically conduct briefings for the EOF Emergency Response Organization:

- Status of the plant
- Material and Personnel support requirements
- On-site or off-site radiological releases or potential releases and release paths
- Incidents of public interest (i.e., fires, spills, personnel contaminations/injuries)
- State and County priorities
- State and County actions (i.e., protective actions, evacuations, traffic control, etc.)
- State and County areas of concern
- Media areas of interest and any misinterpretations of the plant situation
- EOF priorities

5.1.28 Ensure that the Spokesperson is informed. Forward plant status and public interest information to the Spokesperson for appropriate use in briefings to the:

- Public
- Media
- WPSR Senior Management
- Partners
- Other financial stakeholders in KNPP or WPSR

5.1.29 If appropriate, plan for a shift relief per EPIP-AD-05.

5.1.30 IF plant conditions meet the requirements of Section 5.1 of EPIP-AD-15, "Recovery Planning and Termination," THEN recovery activities or termination can be implemented in accordance with EPIP-AD-15.

5.1.31 IF Final Conditions are NOT met (Section 6.0), THEN return to Step 5.1.15.

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5.1.32 WHEN Final Conditions are met (Section 6.0),

- a. Ensure that termination or plant recovery Event Notifications have been initiated by the Off-Site Communicator.
- b. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
- c. Collect all completed forms, notes, and other documentation and give them to the ALD.
- d. Schedule a self-critique with all event participants in the EOF (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

5.2 **Administrative Logistics Director (ALD) shall:**

5.2.1 WHEN notified that an Emergency has been declared,

- a. Report to the Emergency Operations Facility immediately.
- b. IF an Administrative Logistics Director has been designated, until released, THEN:
 1. If appropriate, plan a shift relief per EPIP-AD-05.
 2. Assist the designated Administrative Logistics Director.
- c. IF an Administrative Logistics Director has NOT been designated, THEN assume the responsibilities of the Administrative Logistics Director and continue implementation of this procedure.

5.2.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Administrative Logistics Director.

5.2.3 As directed by the ERM,

- a. Contact EOF administrative support personnel or others.
- b. Instruct them to report to the EOF immediately or to remain on standby for further instructions.

5.2.4 Support or implement the EOF activation process (EPIP-EOF-02).

5.2.5 Arrange for security support at the EOF, JPIC, and MC by implementing procedure EPIP-EOF-12.

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- 5.2.6 As needed, assign EOF support personnel to provide administrative support as defined in EPIP-EOF-11, "Internal Communications and Documentation Flow," to:
- a. Maintain status boards and event sheets (Step 5.1).
 - b. Ensure communications are properly distributed (Step 5.2).
 - c. Ensure that a "Master Log" is established and maintained (Step 5.3).
- 5.2.7 Establish procedures for the long term storage of the documents, records, and logs generated by the event.
- 5.2.8 Ensure that appropriate logs, records, and documents are maintained for the duration of the event. Those logs, records, and documents shall include as a minimum:
- Ongoing plant status and conditions
 - Date and time of significant accident events
 - Chronology of plant accident mitigation and repair priorities
 - All calculated, measured, or State provided radiological release data and information
 - All event notification and status update documents generated
 - Any messages generated or recorded
 - All Honeywell computer printouts generated for status board maintenance or general information
 - All logs maintained by EOF staff
 - All news statements from the JPIC
- 5.2.9 Monitor the flow of information in the EOF and correct any problems.
- 5.2.10 If required, arrange for communication system service repair (see EPIP-EOF-02, Step 5.1.3).
- 5.2.11 If required, develop a shift schedule to provide for 24-hour operation of the EOF and security staff per EPIP-AD-05.
- 5.2.12 Obtain purchasing support (see EPIP-APPX-A-03, "Off-Site Telephone Numbers," for WPSC contact) for assistance in the following:
- Material purchase and control contract negotiations
 - Administering the petty cash fund, expense accounts, and handling payroll matters

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5.2.13 If needed, provide for the following manpower needs:

- Technical and craft disciplines through organizations such as Westinghouse Electric Corporation, Fluor Engineering, or INPO
- Labor relations' assistance

5.2.14 If needed, obtain the following logistical assistance for:

- Transportation of emergency response personnel
- Airline and hotel accommodations
- Office supplies and furniture
- Document reproduction
- Food deliveries
- Sanitation

5.2.15 IF Final Conditions are not met (Section 6.0), THEN return to Step 5.2.6.

5.2.16 WHEN Final Conditions are met (Section 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 records and logs as described in procedure "Declared Emergency Evaluation and Documentation," EPMP-02.01.
- c. Ensure "EOF Deactivation Checklist," Form EPIPF-EOF-02-02, is completed per EPIP-EOF-02.

5.3 **Environmental Protection Director (EPD)** shall:

5.3.1 WHEN notified that an Emergency has been declared,

- a. Report to the Emergency Operations Facility.
- b. IF an Environmental Protection Director has been designated, until released, THEN:
 1. If appropriate, plan a shift relief per EPIP-AD-05.
 2. Assist the designated Environmental Protection Director.
- c. IF an Environmental Protection Director has NOT been designated, THEN assume the responsibilities of the Environmental Protection Director and continue implementation of this procedure.

5.3.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Environmental Protection Director.

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- 5.3.3 If necessary, establish the environmental team organization in accordance with EPIP-ENV-01, "Environmental Monitoring Group Organization and Responsibilities."
- 5.3.4 Ensure status boards are maintained along with a record of significant events, data reported, and directives given.
- 5.3.5 Provide overall direction to the Environmental Monitoring Group.
- 5.3.6 Prepare plant status updates for transmission to the Environmental Monitoring (EM) Teams.
- 5.3.7 Direct the State Radiological Coordinator Liaison to provide available information to the State Radiological Coordinator using Form EPIPF-EOF-08-06 as a guide.
- 5.3.8 Inform the RPD when an EM Team member approaches administrative or legal radiological exposure limits.
- 5.3.9 Maintain an overall awareness of environmental consequences and the contributing factors of those consequences.
- 5.3.10 Evaluate dose projections and field data.
- 5.3.11 Assist the Emergency Response Manager (ERM), the Emergency Director (ED), and the Radiological Protection Director (RPD) in determining protective action recommendations.
- 5.3.12 Communicate frequently with the Radiological Protection Director to confirm the accuracy of input data to the dose projection process.
- 5.3.13 As necessary, establish and maintain communication with other Emergency Response Organization Directors and Off-Site Authorities.
- 5.3.14 IF a radiological release has occurred or is imminent, THEN contact Environmental Inc. (Midwest Lab.) (see EPIP-APPX-A-03 for phone number) and make arrangements for conducting soil/vegetation/water/snow deposition sampling and analysis.
- a. Identify locations where deposition sampling and analysis is needed using EMT field data and dose projection results.
 - b. Perform sampling and analysis using the methodology described in the KNPP "Radiological Environmental Monitoring Manual (REMM)."
 - c. Provide sample analysis results to the State Radiological Coordinator.
- 5.3.15 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.3.16 IF Final Conditions are NOT met (Section 6.0), THEN return to Step 5.3.4.

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5.3.17 WHEN Final Conditions are met (Section 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 records, logs, forms, notes, and other documentation and give them to the ALD.
- c. Schedule a self-critique with all event participants in the environmental group (all shifts) as soon as possible. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

5.4 **State Radiological Coordinator Liaison (SRCL) shall:**

5.4.1 WHEN notified that an Emergency has been declared:

- a. Report to the Emergency Operations Facility.
- b. IF a State Radiological Coordinator Liaison has been designated, until released, THEN
 1. Assist in the activation of the EOF per EPIP-EOF-02.
 2. If appropriate, plan a shift relief per EPIP-AD-05.
 3. Assist the designated State Radiological Coordinator Liaison.
- c. IF a State Radiological Coordinator Liaison has NOT been designated, THEN assume the responsibilities of the State Radiological Coordinator Liaison and continue implementation of this procedure.

5.4.2 Notify the Environmental Protection Director of your assumption of the responsibilities of the State Radiological Coordinator Liaison.

5.4.3 Obtain and complete "SRCL Initial Action Checklist," Form EPIP-EOF-04-01.

Note

Assistance may be obtained from other environmental organization members or by requesting the ALD to provide EOF support staff.

5.4.4 Ensure radiological information provided by the State Radiological Coordinator is passed to the EPD.

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5.4.5 Perform an initial core damage assessment.

5.4.5.1 Collect the following values from the plant process computer using Attachment A.

- RVLIS indication - PPCS Point ID L8020G and L8021G
- Core exit thermocouple reading - PPCS Graphic Display #4
- Containment radiation monitor readings R-40 & R-41 - PPCS Point ID G0040G & G0041G

5.4.5.2 Go to Table 3 of EPIP-TSC-09A, "Core Damage Assessment," and determine the appropriate classification of fuel damage using all of the parameters collected in Step 5.4.5.1.

5.4.6 On a continual basis, collect available information using the following forms as a guideline:

- "Plant Emergency Status Report," Form EPIPF-EOF-08-05 (from the Engineering/Licensing Coordinator)
- "Radiological Status Report," Form EPIPF-EOF-08-06 (from the ENV Dose Calculator)
- Other sources that would provide information to assist the SRC in making decisions concerning public health and safety

5.4.7 Transmit information to the SRC by phone as promptly as possible.

5.4.8 IF specifically requested by State or County Officials, THEN provide written radiological event summaries using Form EPIPF-EOF-08-06 for transmission to those officials by facsimile.

- a. Complete "Radiological Status Report," Form EPIPF-EOF-08-06.
- b. Forward the completed Form to the ERM for approval.
- c. Inform the EPD that you have completed "Radiological Status Report," Form EPIPF-EOF-08-06, to be transmitted by facsimile to State and County Officials.

Note

If needed, use an extra SRCL to cover the HPN phone.

5.4.9 Respond to incoming calls from the NRC over the HPN phone.

5.4.10 Support the completion of "Event Notice," Form EPIPF-AD-07-01, and the development of protective action recommendations.

5.4.11 If appropriate, plan for shift relief per EPIP-AD-05.

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5.4.12 IF Final Conditions are NOT met (Section 6.0), THEN return to Step 5.4.4.

5.4.13 WHEN Final Conditions are met (Section 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 records, logs, notes, and other documentation and give them to the ALD.

5.5 Engineering/Licensing Support Coordinator shall:

5.5.1 WHEN notified that an Emergency has been declared,

- a. Report to the Emergency Operations Facility.
- b. IF an Engineering/Licensing Support Coordinator has been designated, until released, THEN
 1. Assist in the activation of the EOF per EPIP-EOF-02.
 2. If appropriate, plan a shift relief per EPIP-AD-05.
 3. Assist the designated Engineering/Licensing Support Coordinator.
- c. IF an Engineering/Licensing Support Coordinator has NOT been designated, THEN assume the responsibilities of the Engineering/Licensing Support Coordinator and continue implementation of this procedure.

5.5.2 Notify the Emergency Response Manager that you have assumed the responsibilities of the Engineering/Licensing Support Coordinator.

5.5.3 Monitor engineering, operational, and licensing events related to the event for the ERM.

5.5.4 Review messages in the "IN" box and:

- a. Brief the ERM on significant changes, events, and information.
- b. IF the message should be placed on the status board or flip chart, THEN mark them as "POST location."
 - Operations Status Board
 - Environmental Status Board
 - Flip Chart
- c. Place the reviewed messages in the "OUT" box.

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5.5.5 WHEN required, provide the ERM:

- a. Review of the event classification (EPIP-AD-02).
- b. When directed by the ERM, complete "Event Notice," Form EPIPF-AD-07-01, for approval and transmittal to off-site agencies.
- c. Updated "Plant Emergency Status Report," Form EPIPF-EOF-08-05.

5.5.6 Perform liaison duties between the ERM and the NRC event response team in the EOF.

5.5.7 Coordinate the activities of the plant communicator, JPIC communicator, and communications with other emergency facilities as appropriate.

5.5.8 If appropriate, plan for a shift relief, per EPIP-AD-05.

5.5.9 IF Final Conditions are not met (Section 6.0), THEN return to Step 5.5.3.

5.5.10 WHEN Final Conditions are met (Section 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 records, logs, forms, notes, and other documentation and give them to the ALD.

5.6 **Off-Site Communicator shall:**

5.6.1 WHEN notified that an Emergency has been declared,

- a. Report to the Emergency Operations Facility.
- b. IF an Off-Site Communicator has been designated, until released, THEN
 1. Assist in the activation of the EOF.
 2. If appropriate, plan a shift relief per EPIP-AD-05.
 3. Assist the designated Off-Site Communicator.
- c. IF an Off-Site Communicator has NOT been designated, THEN assume the responsibilities of the Off-Site Communicator and continue implementation of this procedure.

5.6.2 Notify the Emergency Response Manager that you have assumed the responsibilities of the Off-Site Communicator.

5.6.3 Verify the phones needed for the Off-Site Communicator are properly located and functional.

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Note

Until turnover of off-site communications is complete, the Control Room or TSC has primary responsibility of the government verification lines. These lines should not be answered unless it is obvious that they are not being answered at the other facilities. IF the line is answered in the EOF prior to official turnover, THEN every effort should be made to reconnect the party on this line with the facility with primary responsibility and in the interim provide the best information available.

5.6.4 Obtain the concurrence of the ERM to start the transfer of off-site communications from the Control Room or TSC to the EOF. When concurrence is obtained,

- a. Contact the Control Room Communicator or EOF Communicator (TSC), and obtain a briefing on the status of off-site notification, and transcribe the information from the "Event Notice," Form EPIPF-AD-07-01, for notifications that have already been transmitted on to clean copy(s) of "Event Notice," Form EPIPF-AD-07-01.
- b. WHEN mutually agreed upon, relieve the Control Room Communicator or the EOF Communicator (TSC) of off-site notification responsibilities.
- c. Remind the Control Room Communicator and/or EOF Communicator (TSC) to turn the bell switch on the Government Verification phone to the OFF position.
- d. Ask the Control Room Communicator or EOF Communicator (TSC) to fax a copy of all "Event Notice," Form EPIPF-AD-07-01, issued from the Control Room to the EOF at their earliest convenience.
- e. Inform the ERM that the EOF now has responsibility for off-site notifications.
- f. Contact off-site EOC's and determine the status of their activation.

5.6.5 Obtain the following information from the off-site EOCs:

- Significant State or County concerns, priorities, and actions
- If appropriate, PAR implementation status
- Required reports or other information from KNPP

5.6.6 Review current status board and chronological event sheet entries.

5.6.7 WHEN directed by the ERM, perform off-site notifications.

- a. IF off-site EOCs HAVE been activated, THEN Go To EPIP-EOF-08 and perform notifications.
- b. IF off-site EOCs have NOT been activated, THEN Go To EPIP-AD-07, Step 5.3 and perform notifications.

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5.6.8 If requested by the ERM, fax hard copy status reports (Forms EPIPF-EOF-08-05 or EPIPF-EOF-08-06) to the State and County EOCs.

Note

Assistance may be obtained by requesting the ALD to provide EOF support staff.

5.6.9 Ensure the EOF status board for off-site conditions is updated on a regular basis. Assistance by the EOF support staff may be requested from the ALD.

5.6.10 If directed by the ERM, activate ERO pagers using EPIP-EOF-08 Step 5.3.

5.6.11 Record incoming and outgoing *ad hoc* telephone messages on "Telephone Communications Log Sheet," Form EPIPF-EOF-04-02.

5.6.12 WHEN requested, brief the ERM on off-site communications, include the following items:

- Off-site Communications status
- Significant State and County concerns, priorities, and actions
- PAR implementation status
- State or County requests for status reports (Form EPIPF-EOF-08-05) or other information updates

5.6.13 Provide communication support as directed by the ERM.

5.6.14 If appropriate, plan for shift relief per EPIP-AD-05.

5.6.15 IF Final Conditions are not met (Section 6.0), THEN return to Step 5.6.6.

5.6.16 WHEN Final Conditions are met (Section 6.0),

- a. Ensure that termination or recovery communications are made as directed by the ERM in accordance with Step 5.6.6.
- b. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
- c. Collect all completed records, logs, forms, notes, and other documentation and give them to the ALD.

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5.7 JPIC/Plant Communicator shall:

- 5.7.1 WHEN notified that an Emergency has been declared,
- a. Report to the Emergency Operations Facility.
 - b. IF a JPIC/Plant Communicator has been designated, until released, THEN
 1. Assist in the activation of the EOF.
 2. If appropriate, plan a shift relief per EPIP-AD-05.
 3. Assist the designated JPIC/Plant Communicator.
 - c. IF a JPIC/Plant Communicator has NOT been designated, THEN assume the responsibilities of the JPIC/Plant Communicator and continue implementation of this procedure.
- 5.7.2 Notify the Engineering/Licensing Support Coordinator of your assumption of the responsibilities of the JPIC/Plant Communicator.
- 5.7.3 Review the following items:
- Master Log Sheets
 - Current Status Board listings
 - Current Chronological Event Sheet listing
 - Any News Statement that may have been generated
- 5.7.4 As directed by the Engineering/Licensing Support Coordinator, monitor the data presented on the Honeywell screens obtaining clarification from the plant, as necessary.
- Note**
Assistance may be obtained by requesting the ALD to provide EOF support staff.
- 5.7.5 Ensure the EOF status boards for "Plant Status" are updated on a regular basis.
- 5.7.6 Record incoming and outgoing *ad hoc* telephone messages on "Telephone Communications Log Sheet," Form EPIP-EOF-04-02.

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- 5.7.7 Establish a conference call with the EOF Communicator in the TSC and the Technical Briefer in the JPIC.
- a. _____ Pickup the telephone receiver and verify that there is a dial tone.
 - b. _____ Dial the EOF Communicator in the TSC (Ext. 8210).
 - c. _____ Notify the EOF Communicator that you will place them on hold to add the Technical Briefer at the JPIC to the conference.
 - d. _____ Press the telephone switch hook and hold for 1 second.
 - e. _____ Release the switch hook and listen for three beeps.
 - f. _____ Dial the Technical Briefer in the JPIC (Ext. 7623).
 - g. _____ Announce to the Technical Briefer that you are going to add the EOF Communicator (TSC) to the conference.
 - h. _____ Press the switch hook and hold for 1 second.
 - i. _____ Verify that the EOF Communicator (TSC) and the Technical Briefer (JPIC) are in the conference.
- 5.7.8 Confer with the ERM and Engineering/Licensing Support Coordinator on key issues and events.
- 5.7.9 Ensure the ERM and Engineering/Licensing Support Coordinator are kept informed of all key issues/events at the plant. The items listed below are key topics the JPIC/Plant Communicator should be receiving or communicating to the communicator network:
- Emergency Classification level declared
 - Events that caused the classification to be declared
 - Actions being taken by WPSC to mitigate the event
 - All incidents relating to personnel injury, contamination, or overexposure to radiation
 - Events happening outside the protected area of the plant (i.e., crashes, fires, tower or substation damage)
 - Outside assistance called in (i.e., ambulance, fire department, or Point Beach Nuclear Plant personnel or equipment)
- 5.7.10 Provide communications support as directed by the Engineering/Licensing Coordinator.
- 5.7.11 If appropriate, plan for shift relief per EPIP-AD-05.
- 5.7.12 IF Final Conditions are not met (Section 6.0), THEN return to Step 5.7.3.

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5.7.13 WHEN Final Conditions are met (Section 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 records, logs, forms, notes, and other documentation and give them to the ALD.

5.8 **EOF Support Staff shall:**

5.8.1 WHEN notified that an Emergency has been declared,

- a. Report to the Emergency Operations Facility.
- b. Notify the Administrative Logistics Director of your availability to assume responsibilities of support staff and continue implementation of this procedure as directed by the Administrative Logistics Director.

5.8.2 Ensure the Honeywell terminal and printer are operating properly. Report problems to ALD.

5.8.3 Assist in activating the EOF in accordance with EPIP-EOF-02.

5.8.4 Perform the tasks described in EPIP-EOF-11.

5.8.5 WHEN directed by the ALD, provide general EOF support.

5.8.6 If appropriate, assist the ALD in plans for shift relief per EPIP-AD-05.

5.8.7 IF Final Conditions are not met (Section 6.0), THEN return to Step 5.8.4.

5.8.8 WHEN Final Conditions are met (Section 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 records, logs, forms, notes, and other documentation and give them to the ALD.

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 EPIP-AD-02, Emergency Class Determination
- 7.2 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.3 EPIP-AD-07, Initial Emergency Notifications
- 7.4 EPIP-AD-15, Recovery Planning and Termination
- 7.5 EPIP-AD-19, Protective Action Guidelines
- 7.6 EPIP-ENV-01, Environmental Monitoring Group Organization and Responsibilities
- 7.7 EPIP-EOF-02, Emergency Operations Facility (EOF) Activation
- 7.8 EPIP-EOF-03, Corporate Action for Unusual Event
- 7.9 EPIP-EOF-08, Continuing Emergency Notifications
- 7.10 EPIP-EOF-11, Internal Communication and Documentation Flow
- 7.11 EPIP-EOF-12, Media Center/Emergency Operation Facility/Joint Public Information Center Security
- 7.12 EPIP-APPX-A, Communications
- 7.13 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.14 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.15 EPMP-02.04, Drill/Exercise Critique and Assessment
- 7.16 WPSC Nuclear Emergency Public Information Plan
- 7.17 Kewaunee Nuclear Power Plant Emergency Plan
- 7.18 NRC Inspection Report K-87-195
- 7.19 COMTRAK 91-187, Item 10
- 7.20 COMTRAK 96-163

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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

- Event Notice, Form EPIPF-AD-07-01
- EOF Activation Checklist, Form EPIPF-EOF-02-01
- Plant Emergency Status Report, Form EPIPF-EOF-08-05
- Radiological Status Report, Form EPIPF-EOF-08-06
- SRCL Initial Action Checklist, Form EPIPF-EOF-04-01
- Telephone Communications Log Sheet, Form EPIPF-EOF-04-02

8.1.2 Non-QA Records

None

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	Title	Work Requests During an Emergency		
	Date	SEP 27 2001	Page	1 of 5
Reviewed By	<i>David R Seebart</i>		Approved By	<i>W H 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 processing Work Orders (WO) in a declared Emergency condition.

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.
- 2.2 Existing General Nuclear Procedures (GNPs) should be used if time and conditions permit. Once the emergency conditions are terminated or recovery operations initiated, this procedure is NOT applicable.

3.0 Precautions and Limitations

- 3.1 All work performed should follow the guidelines of the WPSC Safety Rules Book.
- 3.2 All work performed must have prior approval of the Shift Manager/Event Operations Director (EOD) prior to commencing.
- 3.3 Any changes to maintenance procedures must be approved by the Support Activities Director (SAD) and the Shift Manager/EOD.

4.0 Initial Conditions

- 4.1 This procedure is implemented when there is a requirement for corrective maintenance during an emergency at the Kewaunee Nuclear Power Plant (KNPP).

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5.0 Procedure

5.1 OSF Coordinator shall:

- 5.1.1 Assign the appropriate Maintenance Group Leader/Supervisor (i.e., electrical, mechanical, I&C) the responsibility of preparing the work package.
- 5.1.2 Ensure that the SAD, Emergency Director (ED), EOD, and Technical Support Center Director (TSCD) understand the scope of the work and any possible effects on plant conditions and/or parameters that may occur due to the performance of this maintenance.
- 5.1.3 Immediately inform the SAD when the repair work is completed.
- 5.1.4 Retain all WOs until the emergency has been terminated or recovery operations implemented, after which all WOs will be put into the normal WO route for processing.

5.2 Maintenance Group Leaders/Supervisors shall:

- 5.2.1 Ensure problem is accurately described on WO Form.
- 5.2.2 Prepare the work package, specify work instructions and retest requirements.
- 5.2.3 Determine requirements necessary to perform job.
 - a. IF a design change is required, THEN an Emergency Physical Change (EPC) Request shall be initiated by the requesting supervisor and forwarded to the TSCD in accordance with EPIP-TSC-04, "Emergency Physical Changes, Major Equipment Repair," prior to starting work.
 - b. List under "Work Instructions" section references that must be used in performing maintenance action. Add additional reference listings as necessary.
 - c. Maintain a copy of the work order.
- 5.2.4 Notify Technical Support Center staff prior to starting work for possible QC support.
- 5.2.5 Schedule the maintenance work with knowledge of the ED's priorities.

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- 5.2.6 Select the Repair Team members according to the following criteria:
- a. Team members should be knowledgeable of the plant layout.
 - b. Team members should be knowledgeable of the type maintenance to be performed.
 - c. At least one member of the team should be a Radiation Technologist when entering any of the following areas:
 1. Radiological conditions are adverse or unknown
 2. Confined space area
 3. Breathable air testing may be required

5.2.7 Assign a Team Coordinator.

5.2.8 If necessary, assign relief team members.

5.2.9 Brief repair teams (Form EPIP-OSF-03-01) prior to commencing work.

5.2.10 Contact the Radiation Protection Group to brief repair teams on radiological conditions and potential hazards prior to commencing work.

5.2.11 Debrief the repair teams when work is completed (Form EPIP-OSF-03-01).

5.2.12 Check to ensure maintenance actions have been performed and documented correctly.

5.2.13 Route the completed WO and "Operational Support Facility Team Briefing," Form EPIP-OSF-03-01, back to the OSF Coordinator.

5.3 Team Coordinator shall:

5.3.1 Review with the RPD the protective clothing and respiratory protection equipment necessary for team actions in radiologically controlled areas.

5.3.2 Obtain Shift Manager's/EODs approval prior to starting work. The Shift Manager/EOD should maintain a copy of the work order.

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5.3.3 During the search and rescue effort,

- a. Monitor the radio.
- b. If required, record radiation levels.
- c. Minimize team members' exposure while they are conducting repair operations by using the principles of ALARA.
- d. Maintain surveillance of the doses (DDE) team members are receiving.
- e. Compare the dose readings to those expected.
- f. IF exposures become significantly higher than expected, THEN report this immediately to the Radiological Protection Director (RPD) by Gai-tronics or radio.
- g. Log all significant events including location and time of occurrence.
- h. Inform the appropriate supervisor of all significant actions being taken by team members.

5.4 **Repair Teams shall:**

- 5.4.1 Receive a briefing from the appropriate Leader/Supervisor and Radiation Protection Group.
- 5.4.2 Follow all briefing instructions, procedural precautions, and RWP instructions.
- 5.4.3 Return to the Operational Support Facility (OSF) when the work is completed and receive a debriefing (Form EPIP-OSF-03-01).

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 EIPs.

7.0 References

- 7.1 NAD-08.02, Work Request/Work Order
- 7.2 EPIP-TSC-04, Emergency Physical Changes, Major Equipment Repair
- 7.3 COMTRAK 87-153
- 7.4 GNP-08.02.01, Work Request/Work Order Processing

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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

- Operational Support Facility Team Briefing, Form EPIPF-OSF-03-01

8.1.2 Non-QA Records

None

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-APPX-A-03	Rev.	BN -		
		Title	Off-Site Telephone Numbers				
		Date	SEP 27 2001	Page 1 of 7			
Reviewed By		<i>Jeanne M. Ferris</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 appendix provides lists of telephone numbers for contacting:

- Off-site agencies or organizations that may be called to respond or assist during a declared emergency at the Kewaunee Nuclear Power Plant (KNPP).

2.0 General Notes

2.1 This appendix may be used as a reference document for any declared emergency. If a listing of KNPP Emergency Response Facility phone numbers is needed, see "WPSC Emergency Response Facility Listing," EPIP-APPX-A-06.

3.0 Precautions and Limitations

3.1 This appendix is updated quarterly. Between these updates, changes may take place that are not recorded in this appendix.

4.0 Initial Conditions

4.1 This appendix is implemented during an emergency at the Kewaunee Nuclear Power Plant.

5.0 Procedure

- 5.1 Changes in telephone numbers which have occurred after the revision date (in header) will not be reflected in this appendix.
- 5.2 Changes to fax numbers preceded by an "*" should be updated in the Prairie Systems Fax Broadcast List "008." For further information, reference "WPS Public Affairs Department," Procedure 64.1, "Prairie Systems Fax Broadcasting."

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 EPMP-05.03, Telephone Number Quarterly Review
- 7.2 EPIP-APPX-A-06, WPSC Emergency Response Telephone Numbers
- 7.3 64.1, Prairie Systems Fax Broadcasting (WPS Public Affairs Department Procedure)

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

OFF-SITE SUPPORT AGENCY TELEPHONE NUMBERS EPIP-APPX-A-03

The data contained on these pages have been intentionally omitted from external copies of this document.

This data is withheld to ensure the privacy of the employees of Nuclear Management Company, LLC, Wisconsin Public Service Corporation, and off-site support groups which have supplied personal information for internal use by Nuclear Management Company. It has also been done to ensure the security of the Kewaunee Nuclear Power Plant Emergency Communications Systems.

All company-held copies of this appendix do contain the telephone numbers and other communication data needed to ensure a prompt response of on-site and off-site support groups over the established communication systems.

TSC AND OSF ACTIVATION CHECKLIST

(Front)

NOTE: *If support is available, Steps 8 - 11 can be performed concurrently with this checklist. Instructions can be found on the back of this form. TSC - KNP Floor Plan, Figure EPIPG-APPX-A-06-03, is attached.*

INITIALS

- 1. Radiological Monitoring:
 - 1.1 Obtain a radiation survey instrument (RO-2 or equivalent) from the RAF and perform an instrument check (Cal. date, battery level, source response). _____
 - NOTE:** *If reading at any time exceeds 100 mR/hr, inform HP IMMEDIATELY.*
 - 1.2 Survey the TSC/OSF and record the **highest** meter reading observed:
_____ mR/hr. _____
 - 1.3 Verify the TSC, AMS-3 unit is in service:
 - (a) Pump running smoothly with indication of flow (approximately 30 LPM) _____
 - (b) Unit "power" light (red) is lit _____
 - (c) Strip Chart is functional _____
- 2.0 Verify the Honeywell computer (KBN02) is on line. _____
- 3.0 Verify the SAS terminal (SAS01) is on line. (see instructions - back page) _____
- 4.0 Verify the OSF, SAM Room, and TSC wall clocks are synchronized with the Honeywell terminal clock. _____
- 5.0 Verify the DAROME System is on and operable. _____
- 6.0 Activate the TSC fax machine. _____
- 7.0 Start up and test the "3M Reader/Printer". _____
- 8.0 Activate the Public Address System. _____
- 9.0 Verify Form TSC-02-02 is completed. _____
- 10.0 Verify Form TSC-02-03 is completed. _____
- 11.0 Verify Form TSC-02-04 is completed. _____
- 12.0 Upon completion of this form, notify the TSCD and SAD of TSC/OSF activation status. _____

YES NO
(check one)

Completed by: _____ Date: _____ Time: _____

TSC AND OSF ACTIVATION CHECKLIST

(Back)

INSTRUCTIONS

- 1.0
- 1.1 Instruments are located in the RAF in the glass door cabinets labeled "HP Instruments and Supplies". Ask for HP assistance if needed.
 - 1.2 Walk slowly through the TSC/OSF, using the meter range that provides needle movement about the middle of the scale. If no movement is apparent, use the lowest range available.
 - 1.3 AMS-3 is located behind the copy machine near the TSC exit (Door 410).
 - (a) Pump should make a low pitch steady hum. The flow meter is on the right side of the unit face. Take the reading at the center of the ball. The reading will vary with atmospheric pressure.
 - (b) The "power" light is in the lower left hand corner of the unit face.
 - (c) The strip chart scale is on the upper edge of the chart and is a logarithmic scale. Readings vary widely dependant upon radon levels, Ensure the pen is marking the chart.
- 2.0 The terminal has a placard on the keyboard labeled "KBN02-TSC Operator". Press the yellow "Graphic Display" button. A list of available graphic displays should appear and be legible.
- 3.0 The SAS01 terminal (next to the KBN02 terminal) should always be on, displaying a clearly legible screen. **If no data is displayed**, the SAS01 may be lined up to the simulator. Contact ITS to re-establish link to the plant process computer.
- 4.0 The OSF and TSC digital clocks are on the west wall of their respective areas. The adjustment switches for the OSF clock are under the clock housing. The switches for the TSC clock are on the wall below the clock Press the buttons as needed to adjust the clock.
- 5.0 The DAROME speaker/control unit is on the upper edge of the partition forming the hall to the RAF doorway. All controls are on the back of the speaker. Turn the "system" switch to the "ON" position. Turn the volume control to the five o'clock position. Have someone hold the "loop test" switch to the right, then, press the microphone bar switch and speak into the microphone. The unit is functioning properly if a distorted form of your voice comes through the speaker.
- 6.0 An OMNIFAX machine is located on counter/desk (station #22) next to the Technical Briefer (TB). Ensure the power switch on the back left side of the unit is "ON."
- 7.0 The 3M Reader/Printer is adjacent to the TSC Exit (Door 410). The power switch is on the right side panel. The power should be "ON." Warm up time is up to 6 min. when power is turned on. Instructions for operation are on the left side of the control panel, Error Code, and print quality instructions are on the right side panel.
- 8.0 The Public Address System is activated by turning on the power switches for the amplifier and microphone mixer located under table at the TSCD end.
- 9.0
- 10.0 These checklists can and should be completed concurrently with this checklist. Verify status of their completion before completing Step 12.0 of this checklist.
- 11.0
- 12.0 Brief the TSCD and SAD on the completion of TSC/OSF activation pointing out radiation levels and any system malfunctions encountered.