

Kewaunee Nuclear Power Plant N490 Highway 42 Kewaunee, WI 54216-9511 920.388.2560 Point Beach Nuclear Plant 6610 Nuclear Road Two Rivers, WI 54241 920.755.2321

Kewaunee / Point Beach Nuclear Operated by Nuclear Management Company, LLC

November 27, 2001

10 CFR 50, App. E

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

Ladies/Gentlemen:

DOCKET 50-305
OPERATING LICENSE DPR-43
KEWAUNEE NUCLEAR POWER PLANT
RADIOLOGICAL EMERGENCY RESPONSE PLAN IMPLEMENTING PROCEDURES

Pursuant to 10 CFR 50 Appendix E, attached is the latest revisions to the Kewaunee Nuclear Power Plant Radiological Emergency Response Plan Implementing Procedures (EPIPs). These revised procedures supersede the previously submitted procedures.

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

Sincerely,

Thomas J. Webb Site Licensing Director

SLC

Attachment

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

P.045

November 27, 2001

### EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

### RETURN TO DIANE FENCL - KNPP

#### **OUTSIDE AGENCY COPIES (1-20)**

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Jim Holthaus - Nuclear Management Company (12)\*

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

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M. Daron - Security Building (46)

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W. Galarneau - SBF/EMT (54)

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W. Galarneau - RAF/RPO (106, 107)

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

W. Galarneau - SBF/EM Team (110, 111, 111A)

W. Galarneau - Aurora Medical Center (118, 119)

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

N. Deda - SBF/SEC (114)

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

Simulator/Communicator (117)

M. Fencl - Security (121)

N. Deda - Security Building (120)

S. VanderBloomen (125)

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Originals to KNPP QA Vault

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

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

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

**EPIP Index, dated 11-27-2001.** 

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I CERTIFY Copy No.  Kewaunee Nuclear Power Pupdated.	(WPSC No.) of the Plant's EPIPs has been
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SIGNATURE	DATE
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C.Z.S. for Diane Fenci

**Enclosure** 

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Reviewed By Deanne M. Ferris	Approv	ved By Dewil	Sobat
Nuclear Safety Related  PORC Review Required	-	☐ Yes ☐ SRO Approva ☐ Temporary ☐ No Changes Rec	⊔ Yes

### 1.0 Purpose

1.1 This procedure provides instruction for the Emergency Director (ED) initially responsible for using this procedure, upon declaration of a plant emergency, to provide off-site authorities with Protective Action Recommendations (PARs). When the Emergency Operations Facility (EOF) has been activated, the responsibility will be assumed by the Emergency Response Manager (ERM).

#### 2.0 General Notes

- 2.1 The Shift Manager is the initial ED in all situations. Any transfer of this responsibility should be documented in the Shift Manager's log and communicated to all other directors.
- 2.2 Communication of the initial PARs should be in progress to state and local emergency government authorities within 15 minutes of the emergency level being declared or as soon as possible without further compromise to plant or public safety.
- The ED, with the assistance of the Radiological Protection Director (RPD), is responsible for PARs to off-site authorities prior to EOF activation. This responsibility is assumed by the Emergency Response Manager, with the support of the Environmental Protection Director (EPD), following the EOF activation. This responsibility may not be delegated.
- As more information becomes available, initial default PARs should be adjusted in accordance with Step 5.2 of this procedure.

#### 3.0 Precautions and Limitations

PARs are normally implemented for affected populations within the 10-mile plume exposure pathway EPZ. However, **DO NOT** ignore populations outside the 10-mile plume exposure pathway **IF** projected doses or field readings indicate doses > 1 rem TEDE or > 5 rem thyroid. (See Step 5.2.10)

#### 4.0 Initial Conditions

4.1 The Emergency Director shall classify the emergency in accordance with EPIP-AD-02, "Emergency Class Determination," prior to the implementation of this procedure.

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#### 5.0 Procedure

#### Note

Adverse meteorology exists if the 10 and 60 meter wind speed is less than 5 mph and Delta T is greater than +2.4 deg. F or Sigma Theta is less than 3.01 deg.

- 5.1 Initial PARs for the appropriate emergency class.
  - 5.1.1 General Emergency
    - a. <u>IF</u> adverse meteorology exists, <u>THEN</u> recommend to off-site authorities using Form EPIPF-AD-07-01, "Event Notice (Wisconsin Nuclear Accident Reporting Form)," Section 9 to evacuate:
      - (C) 0-5 mile radius
    - b. <u>IF</u> adverse meteorology **DOES NOT** exist, <u>THEN</u> recommend to off-site authorities using Form EPIPF-AD-07-01 Section 9 to evacuate:
      - (B) 0-2 mile radius
    - c. Ensure on-site members of the general public (visitors, fishermen, tourists, farmers, etc.) are directed to leave the site in accordance with EPIP-SEC-02, "Security Force Response to Emergencies."
    - d. Ensure control measures for site access/egress are established in accordance with EPIP-SEC-02.

### 5.1.2 Site Emergency

- a. Verify on-site members of the general public are directed to leave the site in accordance with EPIP-SEC-02.
- b. Verify control measures for site access/egress are established in accordance with EPIP-SEC-02.
- c. Immediate Planned Protective Action Recommendations from Form EPIPF-AD-07-01 Section 9 for the general public are:
  - (A) None

#### 5.1.3 Alert

- a. Verify on-site members of the general public are directed to leave the site in accordance with EPIP-SEC-02 as a precautionary measure.
- b. Verify control measures for site access/egress are established in accordance with EPIP-SEC-02.

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- c. Immediate Planned Protective Action Recommendations from Form EPIPF-AD-07-01 Section 9 for the general public are:
  - (A) None
- 5.1.4 Unusual Event
  - a. Immediate Planned Protective Action Recommendations from Form EPIPF-AD-07-01 Section 9 for the general public are:
    - (A) None
- 5.2 PARs developed from Dose Projections and/or field survey and sample results.
  - 5.2.1 Obtain the most recent RASCAL dose projections for TEDE and thyroid doses.
  - 5.2.2 Obtain field survey and sample results.
  - 5.2.3 Compare the available information obtained from the most recent RASCAL dose projections and field data with Table 1 to determine possible changes to off-site PARs.
    - a. <u>IF</u> projected or direct field result doses meet the criteria in the first column of the table, <u>THEN</u> relay the identified "recommended action" to the ERM (ED) immediately.
  - 5.2.4 Evaluate the impact time, plant conditions (past, present, projected), weather conditions and forecast, and evacuation time estimates using Table 2, "Evacuation Time Estimates (KNPP/EPZ)."
  - 5.2.5 Determine the most effective appropriate protective actions the public can take based on both radiological and plant conditions.

#### Note

The following step will normally be performed only if the State EOC in Madison has been activated.

- 5.2.6 If appropriate, instruct the State Radiological Coordinator Liaison (SRCL) to discuss potential changes in PARs with the State Radiological Coordinator (SRC) for the State of Wisconsin.
- 5.2.7 <u>IF</u> new PARs are advisable, <u>THEN</u> complete Form EPIPF-AD-07-01.
- 5.2.8 Forward Form EPIPF-AD-07-01 to the appropriate Communicator for transmission to government officials.
- 5.2.9 <u>IF</u> projections indicate a potential dose to the thyroid of > 25 rem for Emergency workers, <u>THEN</u> verify "Potassium Iodide Distribution," EPID-AD-18, is being implemented.

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- 5.2.10 <u>IF</u> projections or field readings indicate doses > 1 rem TEDE or > 5 rem thyroid to any population outside of the EPZ, <u>THEN</u> report this immediately to the state and counties and if requested, provide assistance with *ad hoc* planning.
- 5.2.11 Repeat Step 5.2 until the Final Conditions are met, see Section 6.0.

#### 6.0 Final Conditions

Additional Protective Action Recommendations are no longer required when the plant emergency has been Terminated or Recovery Actions have begun and the responsible Director has suspended the use of EPIPs.

#### 7.0 References

- 7.1 EPA-400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (October 1991)
- 7.2 NUREG/CR-2925, In-Plant Considerations for Optimal Off-site Response to Reactor Accidents (November 1982)
- 7.3 U.S. Food and Drug Administration, 21CFR Part 1090
- 7.4 EPIP-AD-02, Emergency Class Determination
- 7.5 EPIP-SEC-02, Security Force Response to Emergencies
- 7.6 NUREG-0654, II.J.7 and II.J.8
- 7.7 Kewaunee Nuclear Power Plant Emergency Plan, Appendix A
- 7.8 EPIP-AD-18, Potassium Iodide Distribution

#### 8.0 Records

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

#### 8.1.1 OA Records

- Event Notice, Form EPIPF-AD-07-01
- 8.1.2 Non-QA Records

None

PROJECTED DOSE (REM) TO THE POPULATION	RECOMMENDED ACTIONS(a)	COMMENTS
TEDE < 1 rem	No planned protective actions. (b)	If the conditions of Section 6.0 are satisfied, previously
Thyroid < 5 Rem	Monitor environmental radiation levels.	recommended protective actions may be reconsidered.
TEDE > 1 rem	Recommend evacuation in affected sectors. Monitor	Seeking shelter would be an alternative if evacuation were
Thyroid > 5 rem	environmental radiation levels and adjust sectors recommended for evacuation based on these levels. Control access.	not immediately possible.

PROJECTED DOSE (REM) TO EMERGENCY TEAM WORKERS	RECOMMENDED ACTIONS(c)	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
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.	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.
TEDE < 25 rem  All other Organs < 250 rem TODE	Emergency workers exposure should be controlled below these levels when their mission involves lifesaving or protection of large populations.	For Environmental/Monitoring Teams, refer to RASCAL "Maximum Doses at Selected Distances" output screen. Check bone, lung, and thyroid doses.

<sup>(</sup>a) These actions are recommended for planning purposes. Protective action decisions at the time of the incident must take existing conditions into consideration. These conditions include containment activity, probability of containment failure, plume transport time, release duration, and any other pertinent conditions.

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<sup>(</sup>b) At the time of the incident, officials may implement low-impact protective actions in keeping with the principle of maintaining radiation exposures as low as reasonably achievable.

<sup>(</sup>c) These actions are recommended for planning purposes. Protective action decisions at the time of the incident must take existing conditions into consideration. These conditions include containment activity, probability of containment failure, plume transport time, release duration, and any other pertinent conditions.

## **EVACUATION TIME ESTIMATES (KNPP/EPZ)**

22.1 C	2 - 3	-4;5°3	Ā.	::2 <b>45</b> ::#\$;	6		<b>1</b> . 12.22.94	=== <b>8</b>	9 ::-
Area (Pop.)	Sectors	*Total Vehicles	Route (Miles)	Avg. Speed (mph)	Travel Time (min.)	Notif. Time (min.)	Plan Time (min.)	Total Evac. Time –(min.)	Severe Weather (min.)
2 (203)	All	64	Hwy. 42 (4.75)	50	6	15	30	51	72
5N (700)	m,n,p,q, r,a,b	89	Co. Tk. B (3)	50	4	15	30	49	68
11	11	130	Hwy. 42 (7.75)	45	11	15	30	56	82
5S (585)	j,k,l,m	47	Co. Tk. AB (3)	50	4	15	30	49	68
11	11	136	Hwy. 42 (4)	50	5	15	30	50	70
10N (3559)	r,a,b	222	Co. Tk. B (4.5)	45	6	15	30	51	72
††	TF .	890	Hwy. 42 (7)	50	9	15	30	54	78
10NW (530)	p,q,r	89	Co. Tk. B (4.5)	45	6	15	30	51	72
11	11	77	Co. Tk. AB (2.5)	50	3	15	30	48	66
10W (803)	n,p,q	84	Co. Tk. Q (4)	45	6	15	30	51	72
11	11	167	Co. Tk. AB (8.5)	50	11	15	30	56	82
10SW (1456)	l,m,n	455	Co. Tk. Q (4)	45	6	15	30	51	72
10SSW (2029)	k,l	92	Co. Tk. Q (4)	45	6	15	30	51	72
11	11	542	Co. Tk. AB (5.25)	50	7	15	30	52	74
10S (663)	j,k	207	Hwy. 42 (5.25)	50	7	15	30	52	74

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	RC riew nuired		□ Yes ☑ No	SRO Approval Of Temporary	□ Yes ☑ No

#### 1.0 Purpose

1.1 This procedure provides instruction for the Notifier (SEC-N), Control Room Communicator (CRCM), EOF Communicator (EOFCM), or Off-Site Communicator (OFFCM) for notification of Off-Site Authorities of an emergency event escalation, de-escalation, change in Protective Action Recommendation (PAR), termination, or entry into recovery, as directed by the Shift Manager (SM), Emergency Director (ED), or Emergency Response Manager (ERM).

#### 2.0 General Notes

- If approached by the media during a declared emergency, refer them to the Telephone Response Center at (920) 433-1400 or 1-(800) 838-6192 and tell them that this is the most accurate source of information.
- 2.2 If more than one communicator is available, then it is preferred that Steps 5.2 and 5.4 be done in parallel.

#### 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 Verify the bell switch for the Emergency Government Verification Phone is ON.
- 3.3 If an emergency class escalation, de-escalation, change in PAR, termination, or entry into recovery occurs during these notifications, disregard any remaining steps and return to Step 5.1. Begin the appropriate actions and notifications for the new emergency level.

#### 4.0 Initial Conditions

- When the State of Wisconsin Emergency Operations Center (State EOC) is activated, this procedure shall be implemented upon declaration of an event ESCALATION,
  - DE-ESCALATION, CHANGE IN PAR, TERMINATION, or
  - ENTRY INTO RECOVERY, as directed by the SM/ED/ERM.

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#### 5.0 Procedure

- 5.1 <u>IF</u> the State EOC is <u>NOT</u> activated, <u>THEN</u> go to "Initial Emergency Notifications," EPIP-AD-07.
- 5.2 Event Notification (Using Primary Method, Dial Select)
  - Verify that any "Event Notice," Form EPIPF-AD-07-01, received from the SM/ED/ERM has their approval signature, date, and time.
  - 5.2.2 Pick up the Dial Select phone.
  - 5.2.3 Verify the line is clear.
    - a. <u>IF</u> someone is using the Dial Select line, <u>THEN</u> state that you have a "PRIORITY 2" notification. They will clear the line unless they have a "PRIORITY 1" call.
    - b. <u>IF</u> someone states they have a "**PRIORITY** 1" conversation, <u>THEN</u> acknowledge their priority and monitor the call until they finish.
  - 5.2.4 <u>WHEN</u> the line is cleared, dial "83-43-53" (agencies to be notified).
  - 5.2.5 <u>IF</u> the Dial Select System is not operating, <u>THEN</u> go to Step 5.3, Event Notification (Using Secondary Method, Commercial Phone).
  - 5.2.6 <u>WHEN</u> each party acknowledges:
    - a. Answer by stating, "This is the Kewaunee Nuclear Power Plant Please stay on the line for a Nuclear Accident Reporting System (NARS) message."
    - b. Record the time they answer on the "Event Notice," Form EPIPF-AD-07-01, (upper left hand corner).

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- 5.2.7 <u>IF</u> after five (5) rings a party has not answered, <u>THEN</u>:
  - a. Press the individuals Dial Select number from the table below,
  - b. WAIT up to five (5) more rings, THEN press the "#" key to cancel ringing.

AGENCY	DIAL SELECT #
All Call	83-43-53
State EOC	83
Kewaunee County EOC	43
Manitowoc County EOC	53

- 5.2.8 <u>IF</u> unable to contact a specific agency, <u>THEN</u> continue with the notification of agencies on the line.
- Using number and letter designation (Ref: "Phonetic Alphabet," EPIP-APPX-A-1, Attachment A-1.1), read aloud, SLOWLY AND DELIBERATELY, the message text (from "Message Start" to "Message End") of the "Event Notice," Form EPIPF-AD-07-01.
- 5.2.10 With all agencies remaining on the line, ask the STATE WARNING CENTER person to repeat back the message.
- 5.2.11 <u>IF</u> required, contact agencies not responding on Dial Select. <u>THEN</u> go to Step 5.3 below.
- 5.2.12 Go to Step 5.6, "Internal Notification Follow-Up."
- 5.3 Event Notification (Using Secondary Method, Commercial Phone)

AGENCY	COMMERCIAL #
State EOC	1-(800) 943-0003
Kewaunee County EOC	1-(920) 487-5257
Manitowoc County EOC	1-(920) 683-4916

5.3.1 <u>UNLESS</u> an agency is already notified using Dial Select, call each agency number in the order shown above.

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- 5.3.2 <u>WHEN</u> the party answers, <u>THEN</u> record the time on "Event Notice," Form EPIPF-AD-07-01.
- Using number and letter designation (Ref: "Phonetic Alphabet," EPIP-APPX-A-1, Attachment A-1.1), read aloud, SLOWLY AND DELIBERATELY, the message text of the "Event Notice," Form EPIPF-AD-07-01.
- 5.3.4 <u>UNTIL</u> all agencies have been notified, repeat Steps 5.3.1 through 5.3.3.

### 5.4 <u>Notification of the ERO</u>

- 5.4.1 <u>IF</u> the KNPP radio pager system is inoperable, <u>THEN</u> go to Step 5.5.
- 5.4.2 Activate Radio Pagers

#### <u>Note</u>

Any PBX telephone extension can be used to activate the pagers.

#### Note

To activate all of the pagers for Directors and other staff for an Unusual Event, you must repeat Steps 5.4.2.b through 5.4.2.h for the pager codes 9211 and 9222.

- a. WHEN directed by the SM/ED/ERM, activate the radio pager codes selected.
  - 1. Check and/or enter the appropriate radio pager codes in Step (d).
  - 2. If directed, enter the return phone number in Step (e), OR
  - 3. Check the appropriate event code in Step (e).
- b. Dial ext. "5213" on any WPSC PBX Telephone (extension xxxx).
- c. IF the PBX phone system is inoperable, THEN:
  - Dial "1-(920) 617-5213" from a Kewaunee (388-xxxx) or other non-Green Bay external telephone company exchange line, <u>OR</u>
  - Dial "617-5213" from any Green Bay (433-xxxx, 617-xxxx, etc.)
     External telephone company exchange, <u>OR</u>
  - Dial "9-(920) 617-5213" from a centrex (431-xxxx) exchange located in the EOF.

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d.	<u>WHEN</u> the phone answers and responds with a single (1) beep, dial the pager access code.
	"9233" - ALERT or HIGHER EVENT(All Emergency Pager Holders), OR
	"9211" - UNUSUAL EVENT (Directors), AND
	"9222" - UNUSUAL EVENT (Select Staff), AND/OR
	"" - Other code(s) provided by the SM/ED/ERM.
e.	WHEN the phone responds with three (3) beeps, dial the message code.
	"Phone number for return call, OR
	"66666"UNUSUAL EVENT, <u>OR</u>
	"77777"ALERT, <u>OR</u>
	"88888" SITE EMERGENCY, <u>OR</u>
	"99999" GENERAL EMERGENCY, <u>OR</u>
	"44444"TERMINATION OR RECOVERY.
f.	Press the "#" key.
g.	WHEN the phone responds with five (5) beeps, hang up.
h.	<u>IF</u> another pager access code is to be activated, <u>THEN</u> return to step (b).

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#### **Note**

This step is used if the radio paging system is inoperable or significantly degraded on a Monday through Thursday, from 3:30 p.m. to 7:00 a.m., Friday 3:30 p.m. until Monday 7:00 a.m., and all day on Nuclear Management Company (NMC) holidays.

### 5.5 <u>Alternate ERO Notification Method</u>

#### Note

A Liaison should not accept responsibility for the ERO Call Tree unless they have immediate access to EPIP-APPX-A-02, "Response Personnel Call List."

#### <u>Note</u>

<u>IF</u> a Liaison does not accept the responsibility for an ERO Call Tree (Part "A" and/or Part "B"), <u>THEN</u> the communicators should implement that part of the Call Tree themselves.

- 5.5.1 Call the following Liaisons in the order listed until two liaisons accept the ERO Call Tree responsibility.

  - b. Contact a Liaison from the list below and inform the Liaison that a(n)

    (Unusual Event, Alert, Site Emergency, or General Emergency) was declared at \_\_\_\_\_ (time) and the ERO Call Tree Part "B" should be activated.

The personal data contained in this step has been intentionally omitted from external copies of this document.

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### 5.6 <u>Internal Notification Follow-Up</u>

- 5.6.1 Inform the JPIC/Plant Communicator in the EOF after each Event Notice has been transmitted to the state and counties.
- 5.6.2 Inform the SRCL in the EOF after each Event Notice has been transmitted to the state and counties.

### 5.7 Record message on Meridian Mail

#### Note

Review Steps 5.7.1 through 5.7.15 and fill in the information in Step 5.7.7 before picking up the telephone receiver.

#### <u>Note</u>

Any PBX extension can be used to access the Meridian Mail.

- 5.7.1 Dial "1700" on any WPSC PBX Telephone (extension xxxx).
- 5.7.2 <u>IF</u> the PBX phone system is inoperable, <u>THEN</u>:
  - Dial "1-(920) 617-5213" from any Kewaunee (388-xxxx) or other non-Green Bay external telephone company exchange line, <u>OR</u>
  - Dial "617-5213" from any Green Bay (433-xxxx, 617-xxxx, etc.) external telephone company exchange, <u>OR</u>
  - Dial "9-1-(920) 617-5213" from a centrex (431-xxxx) exchange located in the EOF.
- 5.7.3 <u>WHEN</u> Meridian Mail answers, Dial "1580#115800#."
- 5.7.4 <u>WHEN</u> acknowledged, Dial "82" (Greeting Maintenance).
- 5.7.5 <u>WHEN</u> acknowledged, Dial "3" (Temporary Greeting).
- 5.7.6 <u>WHEN</u> acknowledged, Dial "5" (Record External Greeting).

#### Note

The information to complete the following greeting can be found on "Event Notice," Form EPIPF-AD-07-01.

5.7.7 **AT THE TONE**, record the following greeting:

"This is the Kewaunee Nuclear Power Plant. A(n) (enter event) was declared at (time) on (date). Please report to your duty station immediately. I say again, please report to your duty station immediately."

5.7.8 Dial "#" (Stop Recording).

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- 5.7.9 Dial "2" (Review Greeting).
- 5.7.10 <u>IF</u> greeting is not the same as recorded in Step 5.7.7, <u>THEN</u> return to Step 5.7.4.
- 5.7.11 <u>IF</u> greeting is correct, <u>THEN</u> Dial "9" (expiration date and time).
- 5.7.12 Press "#" (default expiration month).
- 5.7.13 Press the number of tomorrows date and # (expiration day) (example: <u>IF</u> today is October 4, <u>THEN</u> enter "5#").
- 5.7.14 Press "**0400**#" (expiration time).
- 5.7.15 Press "83" (logoff) then hang up.

#### 5.8 Event Notice Fax

#### Note

You will receive a confirmation copy of your fax broadcast material and a summary of delivery status at the fax machine in Public Affairs (A2-South West).

#### Note

 $\underline{\mathit{IF}}$  a confirmation fax is not received or other problems are encountered with the broadcast fax,  $\underline{\mathit{THEN}}$  additional information on use can be found in the Nuclear Emergency Public Information Plan (NEPIP) Appendix 10.

- 5.8.1 <u>WHEN</u> time permits, send fax broadcast, obtain a fax cover sheet "Fax for Emergency Declaration or Status Updates," Form EPIPF-EOF-08-03, and prefix the "Event Notice," Form EPIPF-AD-07-01, with it.
  - a. Dial "1-(800) 839-6734" on the EOF fax machine telephone receiver.
  - b. Follow the prompts and enter "1115947," (the seven digit mailbox number).
  - c. Enter "985947" (pin code).
  - d. Press "#."
  - e. Enter "008#" (broadcast list number).
  - f. Press "#" (immediate delivery).
  - g. Place the document in the fax machine.
  - h. Press the "START" (or "FAX") button.
  - i. Hang up the telephone receiver.

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#### Note

Detailed instructions for the use of the EOF fax machine are contained in "Communication System Description," EPIP-APPX-A-1, Section 5.10.

5.8.2 <u>IF</u> the fax broadcast capability is lost, <u>THEN</u> send fax copies of the "Event Notice," Form EPIPF-AD-07-01, to the following locations individually:

LETTER DESIGNATOR	REMOTE FAX LOCATION	REMOTE FAX NUMBER
A	NRC Headquarters	9-1 (301) 816-5151
В	Wisconsin DEM (EOC)	9-1 (608) 242-3299
С	Wisconsin-Rad. Protection (EOC)	9-1 (608) 242-3285
D	DHFS Mobile Lab	9-1 (920) 794-7388
E	Kewaunee County EG (EOC)	9-1 (920) 487-2963
F	Manitowoc County EM (EOC)	9-1 (920) 683-4568
G	American Nuclear Insurance	9-1 (860) 561-4655
Н	INPO	9-1 (770) 644-8549
I	Point Beach Nuclear Plant	9-1 (920) 755-6258
J	KNPP TSC	9-1 (920) 388-8396
K	JPIC	9 431-6428
L	Point Beach Admin	9-1 (920) 755-6258
M	NMC	9-1 (715) 377-3355

Return to EPIP-AD-03, EPIP-AD-04, or EPIP-EOF-04 at the step when you left that procedure.

#### 6.0 Final Conditions

- 6.1 The off-site notification implemented upon declaration of an event DECLARATION,
  - ESCALATION, DE-ESCALATION, CHANGE IN PAR, TERMINATION, or
  - ENTRY INTO RECOVERY, is complete.

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#### 7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-APPX-A-1, Communication System Description
- 7.3 EPIP-APPX-A-02, Response Personnel Call List
- 7.4 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.5 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.6 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.7 EPIP-AD-07, Initial Emergency Notifications
- 7.8 EPIP-EOF-04, Corporate Action for Alert or Higher
- 7.9 EPIP Appendix B, Forms

#### 8.0 Records

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

### 8.1.1 QA Records

• Event Notice, Form EPIPF-AD-07-01

#### 8.1.2 Non-QA Records

None

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WISCONSI	N PUBLIC SER	VICE CORP.	No.	EPIP-R	RET-02	Re	ev. U
Kewaur	nee Nuclear Po	wer Plant	Title	In-Plan	t Radiation En	nergency	
<i>'</i>	Plan Implements	7	Date	NOV 27	7 2001	Pag	<b>ge</b> 1 <b>of</b> 6
Reviewed By	Ithomas 1.	Frhmidli	Approv		David R		A
Safety Related	☐ Yes	PORC Review		□ Yes	SRO Approval Temporary	Of	□ Yes
Related	☑ No	Required			Changes Requ	ired	☑ No

### 1.0 Purpose

1.1 This procedure provides instruction for the In-Plant Radiation Emergency Team (IRET), when activated.

#### 2.0 General Notes

2.1 None

## 3.0 Precautions and Limitations

- 3.1 Depending on the nature, class, and magnitude of the emergency, the following list of priorities should be generally followed by the IRET:
  - 3.1.1 Protection of personnel from high levels of radiation through radiation surveys and air activity surveys.
  - 3.1.2 Search and rescue for life saving.
  - 3.1.3 First Aid.
  - 3.1.4 Issue dosimetry and respiratory equipment.
  - 3.1.5 Health Physics (HP) coverage for operation or repair of vital equipment.
  - 3.1.6 Radiologically Controlled Area (RCA) access restrictions.
  - 3.1.7 Assist Fire Brigade.
  - 3.1.8 Sampling for gaseous effluent release characterization.
  - 3.1.9 Off-site dose projection.
  - 3.1.10 Assist Chemistry personnel for primary coolant and containment post accident sampling and analysis.
  - 3.1.11 Assist and support the site and environmental monitoring teams as required.
  - 3.1.12 Document radiation exposures to personnel.

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#### 4.0 Initial Conditions

4.1 An Alert or higher emergency has been declared at the Kewaunee Nuclear Power Plant (KNPP).

### 5.0 Procedure

- 5.1 <u>In-Plant Radiation Emergency Team (IRET) Activation</u>
  - 5.1.1 <u>WHEN</u> notified of an emergency at KNPP, assemble in the Radiation Protection Office (RPO).
  - 5.1.2 <u>IF</u> the RPO is not habitable, or at the direction of the Radiological Protection Director (RPD), <u>THEN</u> report to the Radiological Analysis Facility (RAF).

#### 5.2 <u>IRET Duties</u>

- 5.2.1 Implement procedure EPIP-RET-02A, "RPO RAF Activation."
- 5.2.2 Dispatch an IRET member to the Site Boundary Facility (SBF) to perform the following:
  - a. Assume the duties of the SBF Coordinator.
  - b. Implement EPIP-RET-04, "SBF Activation."
- Restrict access into the RCA to emergency related activities as authorized by the Emergency Director (ED) or the RPD.
- 5.2.4 Determine if any abnormal radioactive releases are occurring using EPIP-RET-02B, "Gaseous Effluent Sample and Analysis."
- 5.2.5 <u>IF</u> a radioactive release is imminent or occurring, <u>AND</u> the Technical Support Center/Emergency Operations Facility (TSC/EOF) is <u>NOT</u> activated, <u>THEN</u> complete the following steps:
  - 5.2.5.1 Obtain meteorological conditions from one of the following:
    - a. Plant Information Computer System
    - b. Honeywell Graphic Output in the TSC (Group Number 9 - Meteorological Data)
    - c. Chart recorders in the TSC
  - 5.2.5.2 Perform off-site dose projections per EPIP-ENV-03C, "Dose Projection Using RASCAL Version 2.2 Software."
  - 5.2.5.3 Advise the Shift Manager/Emergency Director (SM/ED) of the results.

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#### Note

At an Alert or higher, dosimetry will be issued to arriving emergency personnel in the Security Building per EPIP-SEC-04, "Security Force Actions for Dosimetry Issue."

5.2.6 <u>IF</u> an Alert or higher is declared, <u>THEN</u> issue dosimetry to all on-site personnel, <u>AND</u> read aloud two times on the Gai-tronics the following message:

Attention in the plant, attention in the plant, dosimetry is required for all on-site personnel. Dosimetry will be issued at all on-site emergency facilities and accountability centers.

5.2.7 <u>WHEN</u> initial issue of dosimetry is completed, <u>THEN</u> read aloud two times on the Gai-tronics the following message:

Attention in the plant, attention in the plant, dosimetry has been issued at all on-site emergency facilities and accountability centers. If you have not yet received dosimetry contact the RP Group at ext.

- 5.2.8 <u>WHEN</u> an emergency entry into the RCA is planned, <u>THEN</u> provide radiological protection coverage in accordance with EPIP-AD-11, "Emergency Radiation Controls."
- 5.2.9 Assist in search and rescue operations in controlled areas.
- 5.2.10 Perform surveys outside the RCA to ensure contamination control.
- 5.2.11 If appropriate, plan for a shift relief per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."

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## 5.3 <u>In-Plant Radiation Emergency Team Support (IRETS) Personnel</u>

#### Note

IRETS personnel may perform limited surveys (measure dose rates, collect smears, and air samples). Dose rates will be verified and smears and air samples will be analyzed by a qualified Radiation Protection Technician (RPT).

#### !! Caution !!

## To Prevent Injury or Death

IRET Support personnel should  $\underline{NOT}$  enter areas where radiation levels have a potential to exceed 100 mR/hr.

- 5.3.1 <u>WHEN</u> assigned, perform the following duties:
  - a. Hand out dosimetry.
  - b. <u>IF Potassium Iodide is approved for use, THEN</u> aid in the distribution of the thyroid blocking agents in accordance with EPIP-AD-18, "Potassium Iodide Distribution."
  - c. Monitor for continued habitability of site facilities.
  - d. Perform other duties as assigned by Radiation Protection Supervision.

## 5.4 <u>Subsequent Actions</u>

- 5.4.1 When directed by the RPD or ED, perform the following:
  - 5.4.1.1 Emergency surveys in accordance with EPIP-RET-02D, "Emergency Radiation Entry Controls and Implementation."
  - 5.4.1.2 Effluent gas sampling in accordance with EPIP-RET-02B.
  - 5.4.1.3 Document emergency exposures in accordance with EPIP-AD-11, "Emergency Radiation Controls."
  - 5.4.1.4 Interface with Point Beach Nuclear Plant for the following additional support and resources, if needed:
    - Personnel
    - Emergency equipment
    - Sample transportation
    - Sample analysis
    - Assistance with injuries

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- 5.4.1.5 Maintain interim storage for highly contaminated samples.
- 5.4.1.6 Evaluate availability and procurement of supplies which may be required.
- 5.4.1.7 Interface with Environmental, Inc. for off-site sample analysis.
- 5.4.1.8 Evaluate methods of recovery planning in accordance with EPIP-AD-15, "Recovery Planning and Termination."

## 6.0 Final Conditions

6.1 Plant Emergency has been Terminated.

## 7.0 References

- 7.1 EPIP-RET-02A, RPO RAF Activation
- 7.2 EPIP-RET-02B, Gaseous Effluent Sample and Analysis
- 7.3 EPIP-RET-02D, Emergency Radiation Entry Controls and Implementation
- 7.4 EPIP-RET-04, SBF Activation
- 7.5 EPIP-ENV-03C, Dose Projection Using RASCAL Version 2.2 Software
- 7.6 EPIP-SEC-04, Security Force Actions for Dosimetry Issue
- 7.7 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.8 EPIP-AD-11, Emergency Radiation Controls
- 7.9 EPIP-AD-15, Recovery Planning and Termination
- 7.10 EPIP-RET-08, Contamination Control at the Aurora Medical Center
- 7.11 EPIP-AD-18, Potassium Iodide Distribution

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## 8.0 Records

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

## 8.1.1 QA Records

None

## 8.1.2 <u>Non-QA Records</u>

None

#### FAX FOR EMERGENCY DECLARATION OR STATUS UPDATES

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#### PLANT EMERGENCY STATUS REPORT

"THIS IS AN ACTUAL EVENT/ DRILL/ COMMUNICATIONS DRILL" (Choose One) Kewaunee Nuclear Power Plant Date/Time: 2. 1. 3. **Description of Events:** 4. Emergency Action Level(s) Exceeded: Major Equipment Affected: (List) 5. b. d. c. e. 7. Radiological Boundaries Lost or Threatened: Reactor Status: (Check one) 6. (Check all that apply) Critical a. Fuel Cladding Shutdown a. h. Reactor Coolant System h. Containment Plant Personnel Status (Enter # or N/A for each type incident): 8. b. # \_\_\_\_\_ Overexposure to Personnel a. # Deaths c. # \_\_\_\_ Injured Personnel Treated On-Site d. # \_\_\_\_ Injuries Treated Off-Site e. # Contaminated Personnel On-Site f. # Contaminated Personnel Off-Site g. Other (explain): 9. Areas Affected by A Radiological Release Plume Path (Downwind Sections: \_\_\_\_:\_\_\_: \_\_\_\_: \_\_\_\_ Distance \_\_\_\_\_ mi.) Deposition (Describe Location: News Statement from the JPIC 10. The Next News Statement is scheduled for (Date: \_\_\_\_\_\_ Time: \_\_\_\_\_\_) State or Local Assistance Required at the Plant 11. a. Resource Required: b. Resource Required: " THIS IS AN  $\square$  ACTUAL EVENT/  $\square$  DRILL/  $\square$  COMMUNICATIONS DRILL" (Choose One)

Date: NOV 2 7 2001

Form EPIPF-EOF-08-05 Rev. A

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## RADIOLOGICAL STATUS REPORT

"THIS IS AN ACTUAL EVENT/ DRILL/ COMMUNICATION DRILL" (Choose One)

1.	Kewaun	ee Nuclear Power Plant 2. Date/Time:
3.	Plant Sta a. b.	General:
4.	Off-site a.	Radiological Conditions:  Release Prognosis:  No Release is expected Release is expected at the start time listed in paragraph 4b below Release is in progress
	b.	Event Times (Complete all applicable times):  Reactor Trip Start of release to containment Start of release to environment **Release Stop ** (Actual / Estimated / Default) Line out inappropriate word(s).
	c.	Type of Release:  Liquid Controlled Monitored  Airborne Uncontrolled Unmonitored  Release Path:
	d.	Plume Path (Downwind Sectors::::::: Distance mi.)
	e.	Doses Downwind at the Plume Centerline:  Based on:  Trield Measurement  *S.B. ( R TEDE: R Thyroid)  2 Mi. ( R TEDE: R Thyroid)  5 Mi. ( R TEDE: R Thyroid)  10 Mi. ( R TEDE: R Thyroid)
		* For KRDose projections use the 0.5 mile values
	f.	Surface Deposition: (Based on:  DPM/100 cm² - Ci/m²  DPM/100 cm² - Ci/m²  DPM/100 cm² - Ci/m²  Location:  DPM/100 cm² - Ci/m²  Location:  Location:  Location:
	g.	Recommended protective actions were made at (Time:) on the Wisconsin Nuclear Accident Reporting System Form, EPIP-AD-07-01, "EVENT NOTICE."

## RADIOLOGICAL STATUS REPORT

<b>5.</b>	Meteorole	ogical Co	onditions:	•			
	a. W	ind Spee	d: MPH				ection: Deg.
	c Sta	ability Cl	lass (check one):	$\square A \square B$		]D [	]E ∏F ∐G
	d. Mi	ixing Lav	yer Height:	Ft. (If not avai	lable use K	RDose	default)
			on (check one):	NONE			<u></u>
	•		Light Rai	n	Moderate	Rain	Heavy Rain
			Light Sno		Moderate	Snow	Heavy Snow
	f. Na	ational W	Veather Service	Wind Speed			
	1. 146	ational **	Cathor Service	, ,			<del></del>
6.	Reactor S	Status:	☐ Tripped (P☐ Hot Shutd	( Megawat lower Level at tri own (Current RC down (RCS is les	p Me S temperati	egawatt ure	es Thermal) deg. F.)
7.	Core Sta	tus:	No Damage	Expected			
				equence in progre		e of dar	mage)
				e (est. Time:			`
				evere Core Dama		ne:	)
			∐ Vessel Melt	Through (est. Ti	me:	) - C4=1-1	Decreasing
			Ave. Temperati	ire: Increa	ising	Stable	Decreasing
_	<b>~</b>		4				
8.	Contain				b.		Containment Leak Rate
	a.	Ontain	nent Spray:		0.	•	None
		OFF					Calculated (cc/sec)
							Design Rate (0.1% per day)
							100% per Day
							100% per Hour
							-
	c.	Pressure	)* •		d	•	Temperature
		Incre	easing				Increasing
		Stabl	le				Stable
		Decr	easing				Decreasing
			<b>G</b> : .				
9.	Steam G				b		Reactor Coolant Concentrations:
	a.		ite: (check one):		U	'•	N/A (No leak)
		None		thes )			Normal
			Pressure (# of tu	harging pumps _	)		100x normal non-nobles
				per minute			Calculated Concentration
			unated (Gunons	poi iiiiiiaio	- /		(Attach Analysis)
							· · · · · · · · · · · · · · · · · · ·
	c.	Partition	ning:			d.	
		□ N/A	(No leak)				None
		Leak	c is above steam	generator water l		ılt)	Safety Valve (or PORV)
				generator water			Air Ejector

## **RADIOLOGICAL STATUS REPORT**

10. Con a.	Containment Bypass Status:  Containment Bypass Leak Rate:  None Calculated ( cc/sec) 0.1% per Day 100% per Day 100% per Hour	b. Release Path:  None Filtered Unfiltered	
11. Gro a. c.	ss Release Rate Data:  Not Applicable (No leak)  Total Ci/sec Kr, Xe %	b. Not Available  Iodines% Cs% Te, Sb	%
12. Spec	Ba, Sr %  cific Isotopic Release Data (Ci/sec):  Not Applicable (No leak)	Ru, Mo % La, Y, Ce, Np % b.  \[ \begin{aligned} \text{Not Available} \end{aligned}	<b>′</b> o
c.	H-3      Sr-91        Mn-54      Y-91        Co-58		35 38 4 6 6 7 10