

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

NRC-02-068

July 24, 2002

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 <u>Radiological Emergency Response Plan Implementing Procedures</u>

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,

Guell O. Rato for

Thomas J. Webb Regulatory Affairs Manager

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, wo/attach.

f1045

DOCUMENT TRANSMITTAL

KEWAUNEE NUCLEAR POWER PLANT

FROM: DIANE FENCL - KNPP

TRANSMITTAL DATE 07-19-2002

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

OUTSIDE AGENCY COPIES (1-20)

T. Webb - NRC Document Control Desk (1)*Krista Kappelman - PBNP - EP (10)*T. Webb - NRC Region III (2, 3)*Craig Weiss - Alliant Energy (11)*T. Webb - NRC Resident Inspector (4) (receives Appx. A phone numbers)*Jill Stern - Nuclear Management Company (12)*T. Webb - KNPP QA Vault (NRC Letter & Memo Only) (15)*

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

J. Bennett (33) D. Seebart (24) J. Ferris (13) T. Coutu (28)

<u>REFERENCE COPIES - CUSTODIAN</u> (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.

Resource Center - Training (82)
D. Krall - CR/SS Office (51, 56)
M. Lambert - TSC (50)
W. Galarneau - RAF (53)
W. Galarneau - SBF/EMT (54)
W. Galarneau - RPO (55)
STF (86, 87, 88)

WORKING COPIES (101-199) These copies of procedures are kept in the areas designated for use in response to an emergency.

W. Galarneau - RAF/RPO (106, 107) W. Galarneau - SBF/ENV (108, 109) W. Galarneau - SBF/EM Team (110, 111, 111A) W. Flint - Cold Chem/HR Sample Room (113) M. Kuether - SBF/SEC (114) D. Krall - CR/Communicator (116)(Partial Distribution) Simulator/Communicator (117) M. Fencl - Security (121) M. Kuether - Security Building (120) 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 July 19, 2002

Please follow the directions listed below. If you have any questions regarding changes made to the EPIPs, please contact Dave Seebart at ext. 8719.

EPIP Index, dated 07-19-2002.

	e t 🔊		
REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-02	AC	EPIP-AD-02	AD
EPIP-SEC-03	AD	EPIP-SEC-03	AE

Return a signed and dated copy of this transmittal letter, within 10 days of transmittal date, to the sender. If you have any questions or comments, please contact Dave Seebart at ext. 8719.

I CERTIFY Copy No	(WPSC No.) of the
Kewaunce Nuclear Power undated.	Plant's EPIPs has been
apuatea.	

SIGNATURE

DATE

Please return this sheet to DIANE FENCL.

Diane Fencl

Enclosure

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EPIP-AD-04	KNPP Response to Alert or Higher	AJ	06-20-2002			
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TSC 9A.6	Core Damage Summary	Deleted	05-16-2002

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WISCON	No.	EPIP-A	AD-02	Rev.	AD		
Kewa	Title	Title Emergency Class Determination					
Emergency Plan Implementing Procedure			Date	π	JL 19 2002	Page 1	of 21
Reviewed By	Dave Lohman		Approv	ed By 🛝	Villiam Yarosz		
Nuclear Safety Related	⊠ Yes □ No	PORC Review Required		☑ Yes □ No	SRO Approva Temporary Changes Req	l Of l	I Yes I No

1.0 Purpose

1.1 This procedure provides instruction for determining proper emergency classification listed in order to activate the appropriate level of response from the Kewaunee Nuclear Power Plant (KNPP) emergency response organization and off-site response organization.

2.0 General Notes

2.1 None

3.0 **Precautions and Limitations**

- 3.1 Plant monitors used to determine whether emergency classification levels are being exceeded should be checked for accuracy prior to declaring an emergency class (e.g., compare against redundant channels, determine if consistent with system status, or verification by sample analysis when required by Chart A(1).
- 3.2 This procedure is not written to facilitate de-escalation. Therefore, any decision to deescalate must be based on a thorough review of procedures and plant conditions. If appropriate, it is preferable to terminate or enter recovery. However, there may be occasions where it is appropriate to de-escalate.
- 3.3 An emergency classification should be made within 15 minutes of recognizing that conditions exist requiring classification in accordance with the EALs. This 15 minute goal is in addition to the 15 minute notification requirement once an emergency declaration has been made on "Event Notice," Form EPIPF-AD-07-01. There are times when it may be appropriate to delay classification while significant changes in plant parameters are evaluated for their impact on classification. Examples of such events are an unanticipated:
 - Plant Trip
 - SI Initiation
 - Entry into an orange or red path
 - Loss of a safety system

If such an event should occur during classification, it may be appropriate to exceed the 15 minute goal to ensure an accurate classification.

WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-AD-02	Rev. AD
Kewaunee Nuclear Power Plant	Title	Emergency Class Det	termination
Emergency Plan Implementing Procedure	Date	JUL 19 2002	Page 2 of 21

4.0 Initial Conditions

4.1 This procedure applies during any plant evolution that may result in an emergency declaration.

5.0 Procedure

- 5.1 Determine if a plant emergency exists during abnormal plant conditions by referring to Table 2-1, Emergency Action Level Charts.
- 5.2 <u>IF</u> a plant emergency exists, <u>THEN</u> perform the required actions of the appropriate emergency procedure listed below:
 - 5.2.1 EPIP-AD-03, "KNPP Response to an Unusual Event"
 - 5.2.2 EPIP-AD-04, "KNPP Response to Alert or Higher"
- 5.3 As plant conditions change, continue referring to the Emergency Action Level Charts.
- 5.4 Determine if the emergency should be reclassified.
- 5.5 IF the event is reclassified, <u>THEN</u> return to Step 5.2.
- 5.6 IF Final Conditions (Section 6.0) are not met, <u>THEN</u> return to Step 5.3.
- 5.7 IF Final Conditions (Section 6.0) are met, <u>THEN</u> use of this procedure may be suspended.

6.0 Final Conditions

6.1 Plant Emergency has been Terminated or Recovery actions have begun and the Responsible Director has suspended the use of EPIPs.

WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-AD-02	Rev. AD
Kewaunee Nuclear Power Plant	Title	Emergency Class Det	ermination
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7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-AD-01, Personnel Response to the Plant Emergency Siren
- 7.3 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.4 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.5 COMTRAK 89-001, NRC Inspection Report 88-11, Improve Guidance for Fires Chart G
- 7.6 OEA 87-246, Report OE 2265, Improve Description of Unusual Aircraft Activity Chart P
- 7.7 NRC Letter 07-11-94, Branch Position on Acceptable Deviations to NUREG-0654

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 <u>OA Records</u>

None

8.1.2 Non-QA Records

None

EMERGENCY ACTION LEVEL CHARTS

The following charts are separated into different abnormal operating conditions which may, depending upon their severity, be classified as an Unusual Event, Alert, Site Emergency, or General Emergency.

	CHART	PAGE
Abnormal Radiological Effluent	A (1)	5
Gaseous Effluent Action Levels	A (2)	6 - 8
Fuel Damage Indication	В	9
Primary Leak to LOCA	С	10
Primary to Secondary Leak	D	11
Loss of Power	Е	12
Engineered Safety Feature Anomaly	F	13
Loss of Indication	G	14
DELETED	Н	14
Secondary Side Anomaly	Ι	15
Miscellaneous Abnormal Plant Conditions	J	16
Fire and Fire Protection	K	17
DELETED	L	17
Earthquake	М	18
High Winds or Tornado	N	18
Flood, Low Water, or Seiche	0	19
External Events and Chemical Spills	Р	20
Security Contingency	Q	21

CHART A(1) ABNORMAL RADIOLOGICAL EFFLUENT

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
	SEE CHART A(2) -	Effluent monitors detect levels corresponding to greater than 1 rem/hr whole body or 5 rem/hr thyroid at the site boundary under " <u>actual</u> <u>meteorological</u> " conditions.	GENERAL EMERGENCY
Proj by tl Env	ected or measured dose rates to be provided ne Radiological Protection Director or ironmental Monitoring Teams.	Projected or measured in the environs dose rates greater than 1 rem/hr whole body or 5 rem/hr thyroid at the site boundary.	GENERAL EMERGENCY
	SEE CHART A(2)	Effluent monitors detect levels corresponding to greater than 50 mr/hr for ½ hour <u>OR</u> greater than 500 mr/hr for two minutes (or five times these levels to the thyroid) <u>OR</u> for "adverse meteorology."	SITE EMERGENCY
Projected or measured dose rates to be provided by the Radiological Protection Director or Environmental Monitoring Teams.		At the site boundary, projected or measured dose rates greater than 50 mr/hr for 1/2 hours <u>OR</u> greater than 500 mr/hr for two minutes (or five times these levels to the thyroid) or EPA PAGs are projected to be exceeded outside the site boundary.	SITE EMERGENCY
	SEE CHART A(2)	Radiological effluents greater than 10 times ODCM instantaneous limits.	ALERT .
a.	Containment R-2 OR R-7 \geq 1.0E+4 mr/hr, OR		
 b. Charging Area R-4 ≥ 1.0E+4 mr/hr, <u>OR</u> c. SFP Area R-5 ≥ 1.0E+4 mr/hr, <u>OR</u> 		Radiation levels or airborne contamination which indicate a severe degradation in the control of radioactive materials (e.g., radiation levels suddenly increase by a factor of	ALERT
d.	Plant area air sample indicates airborne contamination > 1,000 times the occupational DAC values.	1,000).	
(1)	Gaseous Releases: See Chart A(2)		
(2)	Liquid Releases: Notification by the Rad-Chem Group of violating ODCM 3.3.1 limits.	Offsite Dose Calculation Manual limits exceeded.	UNUSUAL EVENT

1. AUX BUILDING VENT RELEASES - WITH SIGNIFICANT CORE DAMAGE

Instrument readings assuming a post accident gas release <u>AND</u> Containment High Range Radiation Monitors 42599 (R-40) and 42600 (R-41) reads 1000 R/hr within one-half hour of the accident.

<u>NOTE</u>: Use adverse meteorology conditions (ADV MET) only when, 10m and 60m wind speed < 5mph <u>AND</u> Delta-T > +2.4 degrees F or Sigma Theta is < 3.01 degrees. All other cases are average meteorology (AVG MET).

SV & SFP FANS	AU	X BLDG SPI	NG MONITO	ORS	S AUX BLDG STACK MONITORS				
	MID R CPM (PPCS PT	ANGE (01-07) ` G9086G	HIGH RANGE CPM (01-09) PPCS PT G9088G		R-35 MR/HR R/HR		R-35 MR/HR		
TOTAL NUMBER RUNNING	AVG MET	ADV MET	AVG MET	ADV MET	AVG MET	ADV MET	AVG MET	ADV MET	
1	**	1.1E+4	6.5E+1	•	**	7.9E+2	1.27E+2	7.9E-1	
2	8.8E+5	5.5E+3	3.25E+1	•	**	3.9E+2	6.35E+1	4.0E-1	GENERAL
3	5.9E+5	3.7E+3	2.16E+1	•	**	2.6E+2	4.2E+1	2.6E-1	EMERG.
4	4.4E+5	2.7E+3	1.62E+1	*	**	2.0E+2	3.175E+1	2.0E-1	-
			<u>,</u>						
1	8.8E+4	5.5E+2	3.0E+0	•	6.3E+3	3.9E+1	6.3E+0	*	
2	4.4E+4	2.7E+2	1.5E+0	*	3.1E+3	1.9E+1	3.1E+0	•	SITE
3	2.9E+4	1.8E+2	1.0E+0	*	2.1E+3	1.3E+1	2.1E+0	•	EMERG.
4	2.2E+4	1.3E+2	•	*	1.5E+3	9.5E+0	1.5E+0	•	
1	1.0E+3	6.2E+0	•	•	7.0E+1	*	*	*	
		21510			255+1	L .	•	•	

NOTE: R-13 and R-14 are expected to be off scale high during all events on this page.

1	1.0E+3	6.2E+0	٠	•	7.0E+1	*	*	*	
2	5.0E+2	3.1E+0	*	•	3.5E+1	*	•	*	ALERT
3	3.3E+2	2.0E+0	*	*	2.3E+1	*	•	+	ALLA
4	2.5E+2	1.5E+0	*	*	1.75E+1	•	•	•	

					····		T	r	
1	1.0E+2	6.2E-1	•	٠	7.0E+0	•	*	*	
2	5.0E+1	3.1E-1	•	•	3.5E+0	*	•	+	UNUSUAL
3	3.3E+1	2.0E-1	*	•	2.3E+0	*	•	*	EVENT
4	2.5E+1	1.5E-1	+	+	1.7E+0	•	*	•	

* Offscale Low

** Offscale High (Confirmation Only)

CHART A(2) GASEOUS EFFLUENT ACTION LEVELS continued

2. AUX BUILDING VENT RELEASES <u>WITHOUT CORE DAMAGE</u>

- <u>NOTE</u>: Use adverse meteorology conditions (ADV MET) only when, 10m and 60m wind speed < 5mph <u>AND</u> Delta-T > +2.4 degrees F or Sigma Theta is < 3.01 degrees. All other cases are average meteorology (AVG MET).
- NOTE: R-13 and R-14 are expected to be off scale high during all events on this page.

SV & SFP FANS	<u> </u>	EMERG. CLASS.					
TOTAL NUMBER RUNNING	MID RANGE CPM (01-07) PPCS PT G9086G		HIGH RANGE CPM (01-09) PPCS PT G9088G		MID RANGE HIGH RANG CPM (01-07) CPM (01-09) PPCS PT G9086G PPCS PT G908		
	AVG MET	ADV MET	AVG MET	ADV MET			
1	**	9.4E+4	1.6E+4	1.0E+2			
2	**	4.7E+4	8.0E+3	5.0E+1	GENERAL		
3	**	3.1E+4	5.3E+3	3.3E+1	EMERG.		
4	**	2.3E+4	4.0E+3	2.5+1			

1	7.5E+5	4.6E+3	8.0E+2	5.0E+0	-
2	3.7E+5	2.3E+3	4.0E+2	2.5E+0	SITE
3	2.5E+5	1.5+3	2.6E+2	1.6E+0	EMERG.
4	1.8E+5	1.1E+3	2.0E+2	1.2E+0	

SV & SFP FANS TOTAL NUMBER RUNNING	AUX BLDG SPING MONITORS		
	LOW RANGE Ci/cc (01-05) PPCS PT G9084G	MID RANGE CPM (01-07) PPCS PT 9086G	EMERG. CLASS.
1	**	8.6E+3	
2	**	4.3E+3	ALERT
3	**	2.8E+3	ALERI
4	**	2.1E+3	

1	6.3E-2	8.6E+2	
2	3.1E-2	4.3E+2	UNUSUAL
3	2.1E-2	2.8E+2	EVENT
4	1.5E-2	2.1E+2	

** Offscale High (Confirmation Only)

CHART A(2) GASEOUS EFFLUENT ACTION LEVELS continued

3. STEAM LINE RELEASE <u>WITH SIGNIFICANT CORE DAMAGE</u>

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Instrument readings assuming radioactive steam is releasing at a total of 1.4E+5 pounds per hour to the atmosphere AND Containment High Range Radiation Monitor 42599 (R-40) or 42600 (R-41) reads 1000 R/hr within one-half hour of the accident.

	". Steam Lin	4" e Monitors	"B" Steam Line Monitors		Emergency Classification
R-15 (cpm)	R-31 (mR/hr)	R-32 (R/hr)	R-33 (mR/hr)	R-34 (R/hr)	
**	1.3E+3	1.3E+0	1.3E+03	1.3E+0	General Emergency
**	6.0E+1		6.0E+1		Site Emergency
**	1.5E-1		1.5E-1		Alert
2.0E+05					Unusual Event

** Offscale High (Confirmation Only)

4. SHIELD BUILDING STACK RELEASE

Instrument readings assuming SBV System is operating in the recirculation mode.

Reactor Bldg. Discharge Vent SPING		Emergency Classification
PPCS PT G9077G (02-07) Mid Range (cpm)	PPCS PT G9079G (02-09) High Range (cpm)	
1.3E+05	1.5E+2	General Emergency
6.7E+03	7.0E+0	Site Emergency
1.5E+1		Alert
		Unusual Event

CHART B FUEL DAMAGE INDICATION

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
 CET > 1,200 Degrees for greater than 15 minutes, OR R40 or R41 > 1,000 r/hr, OR SACRG-1, Severe Accident Control Room Guideline Initial Response has been implemented. 	Plant conditions exist that make the release of large amounts of radioactivity in a short time period possible.	GENERAL EMERGENCY
(Major damage is more than one spent fuel element damaged.)	Major damage to spent fuel in containment or auxiliary building.	SITE EMERGENCY
 Fuel Handling accident in Containment Alarm on R-11 <u>OR</u> R-12, <u>AND</u> Dropped spent fuel assembly, <u>OR</u> Report of a large object dropped in Rx core, <u>OR</u> 		
 (2) <u>Fuel Handling Accident in Auxiliary Bldg.</u> a. Alarm on R-13 or R-14, <u>AND</u> b. A large object dropped in spent fuel pool, <u>OR</u> c. A dropped spent fuel assembly, <u>OR</u> d. A loss of water level below spent fuel. 		
(1) R-9 indication is offscale high, AND	Severe loss of fuel cladding	ALERT
(2) Laboratory analysis confirms RCS activity levels comparable to USAR Appendix D, Table D.4-1.	a. Very high coolant activity sample	
	 b. Failed fuel monitor indicates greater than 1% fuel failures within 30 minutes or 5% total fuel failures. 	
 Fuel Handling Accident in Containment A confirming report, <u>AND</u> Alarm on R-11 <u>OR</u> R-12, <u>OR</u> <u>Fuel Handling Accident in Auxiliary Bldg.</u> A confirming report, <u>AND</u> Alarm on R-13 <u>OR</u> R-14. 	Fuel damage accident with release of radioactivity to containment or auxiliary building.	ALERT
 (1) With RCS Temperature > 500°F, a. > 0.2 μCi/gram DOSE Equivalent I-131 for 48 hours, <u>OR</u> b. Exceeding T.S. Figure 3.1-3 for Dose Equivalent I-131, <u>OR</u> c. > 91/Ē μCi/cc 	High reactor coolant activity sample.	UNUSUAL EVENT
As determined by SP-37-065 (from T.S. 3.1.c)	Failed fuel monitor indicates greater	UNUSUAI
 R-9 is greater than 5.0 R/hr, <u>AND</u> Verified by RCS chemistry sample analysis. 	than 0.1% equivalent fuel failures within 30 minutes.	EVENT

CHART C PRIMARY LEAK TO LOCA

<u>NOTE</u>: This chart does not apply when leakage from the Reactor Coolant System is caused by a Steam Generator tube rupture.

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) (2) (3)	 <u>LOCA</u> is verified per IPEOP E-1, "Loss of Reactor or Secondary Coolant," <u>AND</u> ECCS failure is indicated by: a. SI and RHR pumps not running, <u>OR</u> b. Verification of no flow to the reactor vessel, <u>OR</u> c. Core exit thermocouples indicate greater than 1,200°F, <u>AND</u> Failure or potential failure of containment is indicated by: a. Physical evidence of containment structure damage, <u>OR</u> b. Containment Pressure is > 23 PSIG and loss of all containment fan coil units and both trains of ICS, <u>OR</u> c. Containment hydrogen monitor indicates 	 Loss of coolant accident, <u>AND</u> Initial or subsequent failure of ECCS, <u>AND</u> Containment failure or potential failure exists (loss of 2 of 3 fission product barriers with a potential loss of 3rd barrier). 	GENERAL EMERGENCY
	\geq 10% hydrogen concentration, <u>OR</u>		
(1)	SI System is activated and RCS leakage exceeds charging system capacity as verified by Control Room indications or IPEOPs.	Reactor Coolant System leakage greater than make-up pump capacity.	SITE EMERGENCY
(1)	Charging flow verses letdown flow indicates an unisolable RCS leak > 50 gpm.	Reactor Coolant System leak rate greater than 50 GPM.	ALERT
(1)	Initiation of reactor shutdown <u>required</u> by Technical Specification, Section T.S. 3.1.d. Indicated leakage may be determined using Reactor Coolant System mass balance calculations performed by SP-36-082.	Exceeding Reactor Coolant System leak rate, Technical Specifications, requiring reactor shutdown.	UNUSUAL EVENT

CHART D PRIMARY TO SECONDARY LEAK

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, AND	Rapid failure of steam generator tubes with loss of off-site power.	SITE EMERGENCY
(2)	Primary-to-secondary flow > 800 GPM OR RCS pressure decreasing uncontrollably, <u>AND</u>		
(3)	All three transformers Main Aux., Reserve Aux., and Tertiary Aux., are de-energized.		
(1)	Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, <u>AND</u>	Rapid gross failure of one steam generator tube with loss of off-site power.	ALERT
(2)	Primary-to-secondary leak rate > 400 GPM, AND		
(3)	All three transformers: Main Aux., Reserve Aux., and Tertiary Aux., are de-energized.		
(1)	Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, <u>AND</u>	Rapid failure of multiple steam generator tubes.	ALERT
(2)	Primary-to-secondary leak rate greater than 800 GPM indicated by SI flow <u>OR</u> RWST level change.		
(1)	Primary-to-secondary leakage > 150 gallons per day for more than 4 hours (TS 3.1.d.2).	Exceeding Primary-to-Secondary leak rate Technical Specification.	UNUSUAL EVENT
(De inci shu	not delay declaration if leakage suddenly reases above 150 gallons per day <u>AND</u> plant tdown actions are initiated.)		

CHART E LOSS OF POWER

-

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	RCS is \geq 350°F, <u>AND</u>	Failure of off-site and on-site AC power, <u>AND</u>	GENERAL EMERGENCY
(2)	Buses 1 through 6 are de-energized including the D/G supplies to buses 5 and 6, <u>AND</u>	Total loss of auxiliary feedwater makeup capability for greater than 2 hours. (Loss	
(3)	Loss of the turbine driven AFW pump, <u>AND</u>	ot power plus loss of all AFW would lead to clad failure and potential containment failure.)	
(4)	Conditions exist for greater than 2 hours. Buses 1 through 6 are de-energized including the		SITE
	D/G supplies to buses 5 and 6 for longer than 15 minutes. (Does not apply when core is unloaded or cavity is flooded with internals removed.)	Loss of on-site AC power (for more than 15 minutes).	EMERGENCY
(1)	Low voltage lockout OR de-energized condition on all safeguards DC distribution cabinets for greater than 15 minutes.	Loss of all vital on-site DC power (for more than 15 minutes).	SITE EMERGENCY
	a. BKA 102 and BKB 102, <u>OK</u> b BRA 104 and BRB 104. OR		
	c. BRA 102 and BRB 104, <u>OR</u>		
	d. BRB 102 and BRA 104		
(Doe floo	es not apply when core is unloaded or cavity is ded with internals removed.)		-
(1)	Low voltage lockout <u>OR</u> de-energized condition on all safeguards DC distribution cabinets for less than 15 minutes.	Loss of all vital on-site DC power (for less than 15 minutes).	ALERT
	a. BRA 102 and BRB 102, OR		
	b. BRA 104 and BRB 104, <u>OR</u>		
	c. BRA 102 and BRB 104, <u>OK</u>		
	u. DKD 102 and DKA 104 es not apply when core is unloaded or cavity is		
floo	ded with internals removed.)		
(1)	Buses 1 through 6 are de-energized, AND	Loss of off-site power, AND	ALERT
(2)	The D/G supplies to buses 5 and 6 do not respond as designed. AC power is restored to bus 5 or 6 within 15 minutes. (Does not apply when core is unloaded or cavity is flooded with internals removed.)	Loss of on-site AC power (for less than 15 minutes.)	
(1)	With the Reactor Coolant System above cold shutdown condition:	Loss of off-site power, <u>OR</u>	UNUSUAL EVENT
	a. All three transformers: Main Aux., Reserve Aux., and Tertiary are de-energized, <u>OR</u>	Loss of on-site power capability.	
	 Both D/Gs unavailable (unable to supply bus 5 or 6 by any means). 		
(1)	Core is unloaded or reactor cavity is flooded with internals removed, <u>AND</u>	Loss of off-site power, AND	UNUSUAL EVENT
(2)	Buses 1 through 6 are de-energized including the D/G supplies to buses 5 and 6 for longer than 15 minutes.	Loss of on-site AC power (for more than 15 minutes).	

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CHART F ENGINEERED SAFETY FEATURE ANOMALY

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
 RCS > 200°F with a loss of cooling capability or inventory control: 	Complete loss of any function needed when RCS > 200°F.	SITE EMERGENCY
a. Loss of negative reactivity control, <u>OR</u>		1
b. Steam dump, S/G safeties, and power operating reliefs not operable (> 350°F), <u>OR</u>		
c. Inability to feed S/Gs (No AFW or Main Feedwater/Condensate Flow), <u>OR</u>		
d. Loss of RCS inventory control, <u>OR</u>		
e. Loss of both trains of RHR, AND		
the inability to sustain either natural <u>OR</u> forced circulation with the steam generators ($\leq 350^{\circ}$ F).		
(A Site Emergency should be declared upon the initiation of bleed and feed per FR H.1, "Response to Loss of Secondary Heat Sink.")		
(Apply this criteria when the RCS is $\leq 200^{\circ}$ F.)	Complete loss of any function needed when $RCS < 200^{\circ}F$	ALERT
(1) Loss of both trains of RHR		
(Does not apply when core is unloaded <u>OR</u> cavity is flooded with internals removed.)		· · · · · · · · · · · · · · · · · · ·
 Failure of both Rx trip breakers to open upon receipt of a valid signal. Applies even if IPEOP FR S.1 is not entered. 	Failure of the Reactor Protection System to initiate and complete a reactor trip which brings the reactor subcritical.	ALERT
 Loss of ESF function, required support function or required Tech Spec instruments <u>OR</u> Exceeding Tech Spec Safety Limits, <u>AND</u> 	Inability to reach required shutdown within Tech Spec limits	UNUSUAL EVENT
 (2) upon discovery, inability or failure to take required shutdown or mode change actions within the required time. 		
(Total loss of AFW system when required (FR-H.1 implemented) should be declared a UE regardless of Tech Spec action compliance.)		

CHART G LOSS OF INDICATION

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	Total loss of Annunciator System computer alarms, and sequence of events recorder for greater than 15 minutes, <u>AND</u>	Most or all alarms (annunciators) lost and a plant transient initiated or in progress.	SITE EMERGENCY
(2)	Uncontrolled plant transient in progress or initiated during the loss.		
(1)	Total loss of Annunciator System, computer alarms, and sequence of events recorder. (Not applicable when plant is at or below cold shutdown.)	Most or all alarms (annunciators) lost.	ALERT
(1)	Significant loss of ESF or Rx Protection instrumentation. An Unusual Event should <u>NOT</u> be declared for a non-emergency Tech Spec backdown, when the affected parameter remains monitorable.	Indications or alarms on process or effluent parameters not functional in control room to an extent requiring plant shutdown or other significant loss of assessment capability.	UNUSUAL EVENT
(Nc shu	t applicable when plant is at or below cold tdown.)		

CHART H

(DELETED)

CHART I SECONDARY SIDE ANOMALY

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)(2)(3)	 Main steam line break that results in a SI actuation, <u>AND</u> a. R-15 or R-19 reads offscale high with confirmation by chemistry analysis, <u>OR</u> b. Primary-to-secondary leakage > 50 gpm, <u>AND</u> a. R-9 or CNTMT high range rad monitors (42599, 42600) indicate > 10 R/hr, <u>OR</u> b. CNTMT hydrogen monitor indicates > 1% hydrogen concentration. 	Steam line break, <u>AND</u> Primary-to-secondary leak > 50 GPM, <u>AND</u> Indication of Fuel Damage.	SITE EMERGENCY
(1)	 Main steam line break that results in a SI actuation, <u>AND</u> a. R-15 <u>OR</u> R-19 reads a factor of 1000 above normal, <u>OR</u> b. Primary-to-secondary leakage > 10 gpm. Turbine trip and observation of penetration of 	Steam line break with significant (greater than 10 GPM) primary-to-secondary leakage. (Applies even if events occur in opposite steam generators.) Turbine rotating component	ALERT
	casing.	failure causing rapid plant shutdown.	EVENT
(1)	The uncontrolled depressurization of the secondary system that results in an SI actuation.	Rapid depressurization of the secondary side.	UNUSUAL EVENT

CHART J MISCELLANEOUS ABNORMAL PLANT CONDITIONS

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)(2)(3)	 Containment boundary failure or potential failure: a. Containment pressure > 46 psig, <u>OR</u> b. Loss of all containment fan coil units and both trains of ICS, <u>OR</u> c. Containment hydrogen monitor ≥ 10% hydrogen concentration, <u>AND</u> Loss of core cooling capability: a. Loss of SI and RHR flow, <u>AND</u> Failure of shutdown system when required: a. Entry into IPEOP FR-S.1, "Response to Nuclear Power Generation/ATWS," <u>OR</u> b. Loss of AFW for greater than 30 minutes 	 Other plant conditions that make a release of large amounts of radioactivity in a short time period possible; e.g., any core melt situation. Examples: Failure of main FW and AFW systems for greater than 30 minutes without Safety Injection and Residual Heat Removal flow. Plus a containment failure is imminent. Transient requiring the operation of shutdown systems with a failure of these shutdown systems. In addition, failure of SI and RHR and containment failure 	GENERAL EMERGENCY
(1)	with loss of main FW and condensate. Evacuation of Control Room (E-O-06 event).	Evacuation of control room and control of shutdown systems required from local stations	SITE EMERGENCY
(1) <u>Exa</u>	Conditions that warrant increased awareness on part of the plant staff will be evaluated by the Plant Manager or his designate. This is to determine if conditions are applicable for activating the E.P. <u>imple</u> : Loss of AFW system when required, validated upon implementation of FR H.1 "Response to Loss of Secondary Heat Sink."	Other plant conditions that warrant increased awareness on the part of plant staff or state and/or local authorities.	UNUSUAL EVENT

CHART K FIRE AND FIRE PROTECTION

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	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	A fire within the Auxiliary Building, Technical Support Center, safeguards alley, D/G rooms, Battery Rooms, or screenhouse that defeats redundant safety trains of ESF equipment causing the required ESF system to be inoperable.	A fire compromising the functions of safety systems.	SITE EMERGENCY
(1)	A fire within the Auxiliary Building, Technical Support Center, safeguards alley, D/G rooms, Battery Rooms, or screenhouse that lasts more than 10 minutes <u>OR</u> causes a single train of required ESF equipment to be inoperable.	A fire potentially affecting safety systems.	ALERT
(1)	Any fire within the protected area lasting more than 10 minutes.	A fire within the plant lasting more than 10 minutes.	UNUSUAL EVENT

CHART L

(DELETED)

CHART M EARTHQUAKE

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	Activation of seismic recorder with TRIGGER, OBE, and DBE lights lit in relay room on RR159, <u>AND</u>	An earthquake greater than Design Basis Earthquake (DBE).	SITE EMERGENCY
(2)	Verification of a seismic event by physical experience or from U. of W Milwaukee Seismic Center.		
(1)	Activation of seismic recorder with TRIGGER, and OBE lights lit in relay room on RR159, AND	An earthquake greater than Operational Basis Earthquake (OBE).	ALERT
(2)	Verification of a seismic event by physical experience or from U. of W Milwaukee Seismic Center.		
(1)	Activation of seismic recorder with TRIGGER light lit in relay room on RR159, <u>OR</u>	An earthquake felt in plant or detected on station seismic instrumentation	UNUSUAL EVENT
(2)	An earthquake felt in the Plant*.		
(*S) dan Seis	hould be confirmed by evidence of physical hage or verification from University of Wisconsin smic Center.)		

<u>NOTE</u>: Telephone numbers for U of W - Milwaukee Seismic Center are in the KPB Emergency Telephone Directory, ETD 02.

CHART N HIGH WINDS OR TORNADO

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	Winds in excess of 100 mph for greater than 1 hour, <u>AND</u>	Sustained winds in excess of design levels with plant not in cold shutdown.	SITE EMERGENCY
(2)	Plant above cold shutdown condition.		
(1)	A tornado which strikes the facility, AND	Any tornado striking facility.	ALERT
(2)	Causes damage to render a single train of required ESF equipment to be inoperable.		
(1)	A tornado observed on-site causing significant damage to the facility.	Any tornado on-site.	UNUSUAL EVENT

CHART O FLOOD, LOW WATER, OR SEICHE

<u></u>					
				EMERGENCY	
				CLASSIFICATION	
	KNPP	INDICATIC	N	CRITERIA	CLASSIFICATION
FOI	REBAY LEV	'EL	-	Flood, low water, or	
Indicat	ed for > 15 n	ninutes		seiche near design	ALERT
			CORRESPOND	levels.	
UPUMPS	I PUMP	2 PUMPS	TO LAKE LEVEL		
NOTE 3	NOTE 1	≥ 94% *	≥ 588 ft.		
< 50% *	NOTE 5	NOTE 5	< 568.5 ft.		
<u>OR</u> Deep wa	ter Wave ≥ 2	2.5 ft.			
FOF	REBAY LEV	'EL		50-year flood, low	
Indicat	ed for > 15 n	ninutes		water level or seiche	UNUSUAL
			CORRESPOND		EVENT
0 FUMES	I POMP	2 PUMPS	TO LAKE LEVEL		
NOTE 2	≥ 98% *	≥ 88% *	≥ 586 ft.		
< 53.1% *	< 46.9% *	NOTES	. 5 (0, 5, 0		
NOTE 4 NOTE 3		< 309.3 ft.			
<u>OR</u> Deep water wave \geq 18 ft. (as confirmed by the					
U.S. Coast G	uard, Two R	ivers)	-		

- NOTE 1: Above the bottom of bar No. 1 painted on the south wall of the forebay.
- <u>NOTE 2</u>: Above the bottom of bar No. 2 painted on the south wall of the forebay.
- NOTE 3: Above the bottom of bar No. 3 painted on the south wall of the forebay.
- <u>NOTE 4</u>: Applies to an uncontrollable decrease (cannot be restored by operator action. If the water box inlet valves are throttled, use other means to determine lake level per E-CW-04, "Loss of Circulating Water.")
- <u>NOTE 5</u>: The corresponding forebay level for the associated lake level is below the circulating water pump trip setpoint of 42%. Therefore, this criterion will not be reached.
- * Computer point for forebay level is L09075A and should be used because of its greater accuracy. Plant elevations and lake elevations are referenced to International Great Lakes Datum (IGLD), 1955

(IGLD 1955 = IGLD 1985 - 0.7 FEET)

CHART P EXTERNAL EVENTS AND CHEMICAL SPILLS

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	An aircraft crash into plant buildings which causes a complete loss of an ESF function.	Aircraft crash affecting vital structures by impact <u>OR</u> fire.	SITE EMERGENCY
(1)	A missile strikes plant buildings, <u>OR</u>	Severe damage to safe shutdown equipment from missiles or explosion.	SITE EMERGENCY
(2)	An explosion occurs within a plant building, which causes a complete loss of an ESF function.		
(1)	Release of flammable or toxic gas from a ruptured container, which causes or is likely to cause evacuation of stations necessary to control shutdown systems, <u>AND</u>	Uncontrolled release of toxic or flammable gas is confirmed within vital area.	SITE EMERGENCY
(2)	Portable monitors indicate toxic or explosive concentrations of the gas at life threatening levels in those vital areas.		
(1)	An aircraft crashes into plant buildings <u>AND</u> causes a single train of required ESF equipment to be inoperable.	Aircraft crash on facility.	ALERT
(1)	A missile strikes the facility <u>AND</u> causes a single train of required ESF equipment to be inoperable.	Missile impact from whatever source on facility.	ALERT
(1)	Release of toxic or flammable gas at life threatening levels from a ruptured container enter the protected area <u>AND</u> impacts safe operation of the plant.	Uncontrolled release of toxic or flammable gas is confirmed within the protected area.	ALERT
(1)	Self-explanatory.	Known explosion damage to facility affecting plant operation.	ALERT
(1)	An aircraft crash within the site boundary, <u>OR</u>	Aircraft crash on-site or unusual aircraft activity over facility.	UNUSUAL EVENT
(2)	Unusual aircraft activity such as erratic flying, dropped unidentified object, or other hostile acts, which threaten the plant or plant personnel. (Any other persistent aircraft activity for which identification attempts through the FAA or other agencies have been unsuccessful.)		
(1)	Release of toxic or flammable gas from a ruptured tank/truck on site, <u>AND</u>	Uncontrolled release of toxic or flammable gas is confirmed on site.	UNUSUAL EVENT
(2)	Portable monitors indicate toxic or explosive concentrations at life threatening levels of the gas near the spill area.		

CHART Q SECURITY CONTINGENCY

	KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1)	Physical attack on the plant that has resulted in unauthorized personnel occupying the control room or any other vital areas as described in the Security Plan.	Loss of physical control of the plant.	GENERAL EMERGENCY
(1)	Physical attack on the plant involving imminent occupancy of the control room, auxiliary shutdown panels, or other vital areas as defined by the Security Plan.	Imminent loss of physical control of the plant.	SITE EMERGENCY
(1)	Security safeguards contingency event that results in a hostile force entering the protected area of the plant, but not gaining control over shutdown capability or of any vital areas as defined in the Security Plan, <u>OR</u>	Ongoing security compromise.	ALERT
(2)	Security safeguards contingency event that results in a site specific HI level CREDIBLE threat as defined in the Security Plan.		
(1)	Security safeguards contingency event that results in a site specific LO level CREDIBLE threat as defined in the Security Plan, <u>OR</u>	Security threat or attempted entry or attempted sabotage.	UNUSUAL EVENT
(2)	Security safeguards contingency event that results in a Bomb threat accompanied by interception of bomb materials, <u>OR</u>		· -
(3)	Security safeguards contingency event that results in an attempted entry into the protected area of the plant by a hostile force, <u>OR</u>		
(4)	Security safeguards contingency event that results in undetonated bomb found within the protected area.		

NOTE: Security staff will NOT act as notifier during security events. Utilize Control Room staff for notifications.

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Kewaunee Nuclear Power Plant			Title	Personnel Assembly and Accountability			ability
Emergenc	y Plan Implementi	ng Procedure	Date	JUL 19	2002	Page 1	of 11
Reviewed By	Dave Seebart		Approv	ed By Willia	im Yarosz		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ Yes SR ☑ No Ch	O Approval (nporary anges Requi	Of red	□ Yes ☑ No

1.0 Purpose

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

2.0 General Notes

- 2.1 When initial assembly and accountability are in progress, certain individuals (as designated in EPIP-AD-01, "Personnel Response to the Plant Emergency Siren") will be allowed to move in, out, and about the PA before initial accountability is complete.
- 2.2 Emergency Response Organization (ERO) staff shall report to their duty locations.
- 2.3 Visitors, Contractors, and non-ERO personnel on-site should assemble in the nearest designated Assembly Area.
- 2.4 Severe Weather
 - 2.4.1 Several of the Assembly Areas are <u>NOT</u> appropriate for severe weather safety.
 - a. Warehouse Annex Lunchroom relocate to the locker room.
 - b. Administrative Training Facility (ATF) Lunchroom relocate to the ATF Basement.
 - c. Simulator Training Facility (STF) Lobby relocate to the Simulator Control Room away from the glass partition along the west wall close to the floor.
 - d. Classroom C Security Building relocate to the Security Building locker room.

<u>Note</u>

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

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

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3.0 Precautions and Limitations

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

4.0 Initial Conditions

4.1 Personnel assembly is required whenever the plant emergency siren is sounded. Accountability will be required upon assembly unless otherwise directed by the Shift Manager/Emergency Director.

5.0 Procedure

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

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

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

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

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5.2 Master Accountability Coordinator (MAC) shall:

- 5.2.1 <u>WHEN</u> accountability is required:
 - a. Report to the Security Building.
 - b. IF a MAC has been designated and UNTIL they are released,
 - 1. If appropriate, plan a shift relief per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."
 - 2. Help the designated MAC.
 - c. <u>IF a MAC has NOT</u> been designated, notify the Site Protection Director (SPD) of your intent to assume the responsibilities of the MAC and continue implementation of this procedure.
 - d. Assign an Accountability Coordinator to the South Security Building Visitor's Desk.
 - Inform this Accountability Coordinator to complete Form EPIPF-SEC-03.01, "Emergency Accountability Log," for ERO members entering the Protected Area.
 - 2. Implement Step 5.3.8 of this procedure.
 - e. <u>IF</u> there is no Accountability Coordinator available for the Security Visitor's Desk, <u>THEN</u> assign a plant staff or security staff member to perform Step 5.2.1.d.
- 5.2.2 After the sound of the plant emergency siren:
 - a. Contact CAS to ensure SAS/CAS has started the "Emergency Accountability Program" on the SMS.
 - b. Make a public address announcement that the program has been activated and personnel in accountability areas should now swipe.
- 5.2.3 Contact Security to verify there is <u>NOT</u> a hard copy visitor list. If this list is available, pick up the KNPP Protected Area Visitor and Non-Designated Vehicle log (SIP 20.02-1) at the Registration Desk.
- 5.2.4 Contact each Visitor's Escort via Gai-tronics to ensure accountability of their Visitor, place a check mark next to the Visitor's name as reported by the Escort.
- 5.2.5 Four minutes after siren activation for a declared emergency, make a public address announcement that personnel who have not swiped a card reader must do so immediately.
- 5.2.6 Five minutes after the SMS Emergency Program has been started, obtain an Emergency Report from CAS or SAS.

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- 5.2.7 Should attempts fail to locate personnel who are unaccounted for, direct the CAS or SAS to run a computer report on that person.
- 5.2.8 Review the Emergency Report
 - a. Contact the Control Room and strike any names from the list that have been positively accounted for (individual is in the Control Room or is accounted for on their "Emergency Accountability Log").
 - b. Contact the Technical Support Center (TSC) and strike any names from the list that have been positively accounted for (individual is in the TSC or is accounted for on their "Emergency Accountability Log").
 - c. Contact all names remaining on the list by any possible means.
- 5.2.9 <u>WHEN</u> all personnel have been contacted or reasonable attempts to contact have failed, record the names of individuals not accounted for and their last known location and provide this information to the SPD.
- 5.2.10 Contact the Accountability Areas outside the PA (per Table 1) to determine the number and location of personnel on-site but not within the Protected Area.
- 5.2.11 Report to the SPD the number and location of personnel on-site but outside the PA and obtain an update regarding personnel hazards and/or severe weather.
- 5.2.12 IF the plant emergency siren sounds after initial accountability, <u>THEN</u> return to Step 5.2.2.
- 5.2.13 Provide Accountability Coordinators (AC) with information regarding personnel hazards and/or severe weather provided by the SPD and continue to do so on a periodic basis.
- 5.2.14 Brief the SPD on any change in accountability status or new problems (i.e., groups or individuals overdue in assembly areas).
- 5.2.15 If appropriate, plan a shift relief for the MAC per EPIP-AD-05.
- 5.2.16 IF Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> return to Step 5.2.12.

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- 5.2.17 <u>WHEN</u> Final Conditions (Section 6.0) are met,
 - a. Return your work area to normal status and return emergency procedures, forms, etc. to there proper place.
 - b. Record any discrepancies to emergency supplies that need correction and report them to the SPD.
 - c. Collect all completed forms, notes, and other documentation and give them to the SPD.

5.3 Accountability Coordinator (AC) shall:

- 5.3.1 <u>WHEN</u> accountability is required:
 - a. Report to your assigned assembly area.
 - b. <u>IF an AC has NOT</u> been designated, <u>THEN</u> notify a Facility Director or MAC of your intent to assume the responsibilities of the AC in the assembly area and continue implementation of this procedure.
 - c. IF an AC has been designated and <u>UNTIL</u> they are released,
 - 1. Help in facility activation.
 - 2. If appropriate, plan a shift relief per EPIP-AD-05.
 - 3. Help the designated AC.
- 5.3.2 Obtain Accountability packet located in the assembly areas in the following locations:
 - a. Control Room (CR) On the wall behind the Control Room Supervisor's desk.

<u>Note</u>

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

- b. Technical Support Center (TSC) On the desk near the entrance door (No. 410).
- c. Radiation Protection Office (RPO) Next to the entrance door (No. 55).
- d. Administrative Training Facility (ATF) Lunchroom southwest corner, above the phone and Gai-tronics.
- e. Warehouse Annex Lunchroom west wall, above the phone and Gai-tronics.
- f. Security Building Room "C" on the wall by the phone and Gai-tronics.
- g. Site Training Facility (STF) Lobby on the wall by the Gai-tronics.

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5.3.3 Locate yourself near the SMS accountability card reader.

<u>Note</u>

Visitors have non-magnetic badges, so they should <u>NOT</u> swipe their key card in an accountability card reader. Log visitors and report their information to the MAC.

- 5.3.4 <u>WHEN</u> the Gai-tronics announcement is made that emergency accountability has been initiated, ensure that all badged personnel located in the area swipe their Security key card in the accountability reader and receive a green light.
- 5.3.5 <u>IF</u> a Director or Supervisor notifies you of individuals who will <u>NOT</u> assemble, <u>THEN</u> record them as if they were leaving the facility per Step 5.3.8.
- 5.3.6 During accountability, demand quiet and cooperation. Maintain accountability of personnel assembled there.
- 5.3.7 <u>WHEN</u> provided by the MAC, inform personnel in your assembly area of information on hazardous areas.

<u>Note</u>

Only address the teams or individuals you logged out.

5.3.8 <u>WHEN</u> an individual elects to move to another area, log their departure on "Emergency Accountability Log," Form EPIPF-SEC-03-01, as follows:

<u>Note</u>

This includes visitors also.

- a. In the "Name" column: Enter the name of the individual leaving the area.
- b. In the "Card" column: Enter the individual's security card number.

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c. In the "Destination" column: Enter the location to which the individual is heading.

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

- d. In the "Departure Time" column: Enter the time the individual departed the area.
- e. In the "Return/Arrive Time" column: Enter the time the individual returns to the area or the time you are informed they arrive at another Assembly Area by the Accountability Coordinator in that area.
- 5.3.9 <u>IF</u> an individual arrives in your area who did not log out of your area and is not immediately returning to the area he checked out of, <u>THEN</u> contact the area he departed and notify them of the individual's arrival time and intent to stay.
- 5.3.10 IF moving the entire group of assembled personnel to another area, <u>THEN</u>:
 - a. Contact the MAC to inform them of the intended move.
 - b. Record badge numbers of people moving.
 - c. Instruct personnel in your area to proceed <u>directly</u> to the new destination, staying in a group until head count can be verified.

REFERENCE USE

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- d. Verify the badge numbers upon arrival at the new location.
- e. Contact the MAC to verify arrival and to provide a phone number at the new location.
- 5.3.11 <u>IF</u> the plant siren is sounded following the initial accountability, <u>THEN</u> initiate contacts to all individuals listed as <u>NOT</u> "Returned or Arrived" on your Form EPIPF-SEC-03-01:
 - a. <u>WHEN</u> contacted, give them any information you know about the siren sounding.
 - b. <u>IF</u> instructed by a Facility Director, instruct the individual to come back to an assembly area.
 - c. Note the individuals that were contacted and notify the MAC of individuals logged out of your area and whether you were able to contact them.
 - d. Return to Step 5.3.4.
- 5.3.12 If appropriate, plan a shift relief for the area AC per EPIP-AD-05.
- 5.3.13 IF Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> return to Step 5.3.7.
- 5.3.14 IF Final Conditions (Section 6.0) are met, THEN

<u>Note</u>

Flag any discrepancies to emergency supplies that need correction.

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

5.4 Security Force shall:

- 5.4.1 <u>WHEN</u> accountability is required and the SMS system is offline, manually maintain a log of personnel entering/exiting the PA to enable the MAC to update the accountability roster as necessary.
- 5.4.2 Guide PA ingress/exit in accordance with EPIP-SEC-02, "Security Force Response to Emergencies."
- 5.4.3 **Patrolling Security Officers** shall:
 - a. Verify their locations by portable radio to the Shift Captain for accountability.
 - b. Obtain personal dosimetry to take with them on patrol in accordance with EPIP-SEC-04, "Security Force Actions for Dosimetry Issue."

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6.0 Final Conditions

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

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-AD-01, Personnel Response to the Plant Emergency Siren
- 7.3 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.4 EPIP-AD-11, Emergency Radiation Controls
- 7.5 EPIP-RET-02D, Emergency Radiation Entry Controls and Implementation
- 7.6 EPIP-SEC-02, Security Force Response to Emergencies
- 7.7 EPIP-SEC-04, Security Force Actions for Dosimetry Issue

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 <u>QA Records</u>

None

- 8.1.2 Non-OA Records
 - Emergency Accountability Log, Form EPIPF-SEC-03-01

ACCOUNTABILITY AREAS (Inside the Protected Area)

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

ALTERNATE LOCATION	PHONE NUMBER
Administrative Training Facility (Basement)	6548
Warehouse Annex (Locker Room)	6454

ACCOUNTABILITY AREAS (Outside the Protected Area)

LOCATION	PHONE NUMBER
Security Building Classroom C	6548
Simulator Training Facility (Lobby)	8427

ALTERNATE LOCATION	PHONE NUMBER
Security Locker Room (Security Building)	8292
Simulator Training Facility (Simulator Control Room)	8607

ACCOUNTABILITY LEADERS

LEADER		PHONE NUMBER
Master Accountability Coordinator (Security Building)		8509
Accountability Coordinator (Sec. Bldg. Visitor's Desk)		8289
Site Protection Director (Sec. Bldg.)		8418
	(TSC)	PBX 8591 Kew. Ex. 388-0459

Friday, July 19, 2002

Attention: NRC Document Control Desk

The purpose of this letter is to inform you that we have not yet received the Document Transmittal Sheet for revisions of procedures made in your copy of the Emergency Plan Implementing Procedures (EPIP) manual.

We are currently performing an audit for all manuals that are distributed from Document Control at Kewaunee Nuclear Power Plant. Since we have not received receipts from you in some time, we are enclosing an index of the Emergency Plan Implementing Procedures (EPIP) Manual. Please use this index to ensure that your manual is up to date. If you find any discrepancies in this manual, please contact me, Laura Ihlenfeldt at (920)-388-8881, or Yvonne Elsen at (920)-388-8136 and we will ensure that you receive the correct updates.

Please complete this audit and sign, date, and return this to me within 30 days, or your manuals will be cancelled.

Thank you in advance for your help!

Yvonne Elsen Document Control Supervisor 388-8136

Laura Ihlenfeldt 388-8881

Date: _____

Signature: _____

INDEX

DATE: 07-19-2002

e

PROC. NO.	TITLE	REV.	DATE	
EP-AD				
EPIP-AD-01	Personnel Response to the Plant Emergency Siren	J	01-08-2002	
EPIP-AD-02	Emergency Class Determination	AD	07-19-2002	
EPIP-AD-03	KNPP Response to an Unusual Event	AF	06-20-2002	
EPIP-AD-04	KNPP Response to Alert or Higher	AJ	06-20-2002	
EP-AD-5	Site Emergency	Deleted	04-27-87	
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	D	05-09-2002	
EP-AD-6	General Emergency	Deleted	04-24-87	
EPIP-AD-07	Initial Emergency Notifications	AR	06-20-2002	
EP-AD-8	Notification of Alert or Higher	Deleted	02-26-96	
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