



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-02-090

September 12, 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  
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  
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.

A045

# DOCUMENT TRANSMITTAL

KEWAUNEE NUCLEAR POWER PLANT

FROM: DIANE FENCL - KNPP

TRANSMITTAL DATE 09-12-2002

## EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

### OUTSIDE AGENCY COPIES (1-20)

T. Webb - NRC Document Control Desk (1)\*  
T. Webb - NRC Region III (2, 3)\*  
T. Webb - NRC Resident Inspector (4) (receives Appx. A phone numbers)\*  
T. Webb - State of Wisconsin (5)\*  
T. Webb - KNPP QA Vault (NRC Letter & Memo Only) (15)\*  
Krista Kappelman - PBNP - EP (10)\*  
Craig Weiss - Alliant Energy (11)\*  
Jill Stern - Nuclear Management Company (12)\*

PERSONAL COPIES (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)

REFERENCE COPIES - CUSTODIAN (41-100) These copies are for general reference by anyone. They are distributed throughout the plant and corporate offices. The named individual is the responsible custodian for the procedures and shall insure they are properly maintained.

NO Library - KNPP (59)  
C. Sternitzky - ATF-2 (44)  
M. Daron - Security Building (46)  
C. Grant - EOF (81)  
C. Grant - OSF (52)  
LOREB - STF (62, 66, 67, 68, 70, 72, 73, 74)  
STF Library (43)  
Resource Center - Training (82)  
D. Krall - CR/SS Office (51, 56)  
C. Grant - 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)  
Ops Admin. (126)  
C. Grant - TSC Response Binder (Partial Distribution)  
C. Grant - EOF Response Binder (Partial Distribution)

Originals to KNPP QA Vault

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

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

**KEWAUNEE NUCLEAR POWER PLANT  
 REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES  
 September 12, 2002**

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

**EPIP Index, dated 09-12-2002.**

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-15	O	EPIP-AD-15	P

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 Kewaunee Nuclear Power Plant's EIPs has been updated.

\_\_\_\_\_  
 SIGNATURE

\_\_\_\_\_  
 DATE

Please return this sheet to *DIANE FENCL*.

**Diane Fencl**

**Enclosure**

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<b>EP-AD</b>			
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 Evac	AF	06-20-2002
EPIP-AD-04	KNPP Response to Alert or Higher	AK	08-20-2002
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
EP-AD-9	Notification of Site Emergency	Deleted	04-27-87
EP-AD-10	Notification of General Emergency	Deleted	04-27-87
EPIP-AD-11	Emergency Radiation Controls	R	04-11-2002
EP-AD-12	Personnel Assembly and Accountability	Deleted	03-26-94
EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
EP-AD-13B	Emergency Assembly/Evacuation	Deleted	03-01-83
EP-AD-13C	Site Evacuation	Deleted	03-01-83
EP-AD-14	Search and Rescue	Deleted	05-25-94
EPIP-AD-15	Recovery Planning and Termination	P	09-12-2002
EP-AD-16	Occupational Injuries or Vehicle Accidents During Emergencies	Deleted	03-14-97
EP-AD-17	Communications	Deleted	03-05-84
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EPIP-AD-19	Protective Action Guidelines	Q	11-27-2001

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EPIP-ENV-01	Environmental Monitoring Group Organization and Responsibilities	W	08-20-2002
EPIP-ENV-02	Environmental Monitoring Team Activation	X	10-02-2001
EP-ENV-3A	Environmental Protection Director Actions and Directives	Deleted	09-26-84
EP-ENV-3B	EM Team Actions	Deleted	09-26-84
EPIP-ENV-03C	Dose Projection Using RASCAL Version 2.2 Software	W	08-20-2002
EP-ENV-3D	Revision and Control of ISODOSE II	Deleted	02-14-95
EP-ENV-3E	Manual Determination of X/Q	Deleted	04-24-87
EP-ENV-3F	Manual Determination of X/Q (Green Bay Meteorological Data)	Deleted	05-30-86
EP-ENV-3G	Manual Dose Projection Calculation	Deleted	06-02-89
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EPIP-ENV-04A	Portable Survey Instrument Use	T	08-20-2002
EPIP-ENV-04B	Air Sampling and Analysis	X	08-20-2002
EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
EPIP-ENV-04C	Ground Deposition Sampling and Analysis	X	08-20-2002
EPIP-ENV-04D	Plume Tracking for Environmental Monitoring Teams	O	08-20-2002
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
EP-ENV-5C	SAM II Operation	Deleted	04-14-86
EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
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EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
EP-ENV-7	Site Access Facility Communications	Deleted	09-26-84
EP-ENV-8	Total Population Dose Estimate Calculations	Deleted	04-14-86
<b>EP-EOF</b>			
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EPIP-EOF-02	Emergency Operations Facility (EOF) Activation	AA	08-06-2002
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EPIP-EOF-08	Continuing Emergency Notifications	X	06-20-2002
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EP-EOF-10	Notification of General Emergency	Deleted	04-24-87
EPIP-EOF-11	Internal Communication and Documentation Flow	U	11-15-2001
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EP-OP-3	Control Room Communications	Deleted	04-24-87
<b>EP-OSF</b>			
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EPIP-OSF-02	Operational Support Facility Operations	U	02-06-2002
EPIP-OSF-03	Work Orders During an Emergency	P	05-09-2002
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
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EPIP-RET-02D	Emergency Radiation Entry Controls and Implementation	M	06-12-2001
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
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EPIP-RET-03	Chemistry Emergency Team	O	02-01-2000
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EP-RET-4A	EOF Radiological Monitoring	Deleted	03-10-83
EPIP-RET-04A	SBF Operation/Relocation	Deleted	10-02-2001
EP-RET-4B	Radiological Controls at Site Access Facility	Deleted	07-12-94
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EPIP-SEC-02	Security Force Response to Emergencies	X	02-06-2002
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EPIP-SEC-03	Personnel Assembly and Accountability	AE	07-19-2002
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EPIP-TSC-02	Technical Support Center Activation	T	02-06-2002
EPIP-TSC-03	Plant Status Procedure	V	10-09-2001
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EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
EPIP-TSC-07	RV Head Venting Time Calculation	J	06-20-2002
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EPIP-TSC-08B*	STMRLS Computer Program	G	06-20-2002
EP-TSC-8C*	See EP-TSC-8B	Deleted	04-16-92
* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			
EP-TSC-9	Core Damage Assessment Using Released Radionuclides	Deleted	09-30-86
EPIP-TSC-09A*	Core Damage Assessment	J	05-16-2002
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EP-TSC-9C*	See EP-TSC-9B	Deleted	04-16-92
* EP-TSC-9A, Rev. D was totally deleted; therefore, EP-TSC-9B became EP-TSC-9A. EP-TSC-9B was previously EP-TSC-9C.			
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EPIP-EOF-12 Form EPIPF-EOF-02-01	EP-FIG-009	EOF-12-01	Division Office Building (2nd Floor) Floor Plan	B	10-24-2000
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EPIP-AD-19	EP-FIG-014	AD-19-01	Population Distribution by Geographical Sub-Areas (with sectors)	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-022	APPX-A-06-04	EOF - WPSC D2-3 Floor Plan	C	10-30-2001
EPIP-EOF-12	EP-FIG-024	EOF-12-02	Location of JPIC and Media Briefing Center Map	C	06-20-2002
EP-SEC-5	EP-FIG-026	SEC-05-01	KNP Site Map & Evacuation Routes	C	06-20-2002
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APPX-A-6	EP-FIG-037	---	Floor Plan - Corporate Response Center	Deleted	08-04-98
APPX-A-6	EP-FIG-038	---	Floor Plan - JPIC	Deleted	08-04-98
EPIP-OSF-02	EP-FIG-039	OSF-02-01	High Priority Work	A	10-02-2001
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EPIP-APPX-A-02	Response Personnel Call List	Deleted	02-06-2002
EPIP-APPX-A-03	Off-Site Telephone Numbers	Deleted	02-06-2002
EPIP-APPX-A-06	KNPP Emergency Response Facility Telephone Numbers	AA	12-21-2001

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ENV-01-02	EMT Status	B	10-31-2000
ENV-01-03	Meteorological and Plant Status Data	C	12-14-2001
ENV-01-04	EMT Orders/Field Data	B	10-31-2000
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EOF-04-02	Telephone Communications Log Sheet	A	12-14-2001
EOF-08-03	Fax for Emergency Declaration or Status Updates	G	11-27-2001
EOF-08-05	Plant Emergency Status Report	A	11-27-2001
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<b>EP-RET</b>			
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RET-04-01	SAM-2 Counting Equipment Worksheet	E	06-12-2001
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RET 8.5	Hospital Survey 3	Deleted	07-25-97
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RET-09-01	Post-Accident TLD Record Sheet	D	04-16-2002
<b>EP-SEC</b>			
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SEC-04-01	Emergency Dosimeter Log	G	06-20-2002
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TSC-01.02	Severe Accident Management Summary and Strategy Recommendation	B	02-06-2002
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TSC-02-05	TSC and OSF De-activation Checklist	A	10-09-2001
TSC-03-01	Plant System Status	L	06-12-2001
TSC-03-02	Plant Equipment Status	L	06-12-2001
TSC-03-03	Environmental Status Board	J	06-12-2001
TSC-03-04	Radiation Monitors	I	01-08-2002
TSC-04-01	Emergency Physical Change Request	G	05-09-2002
TSC-04-02	Emergency Physical Change Safety Review	Deleted	05-09-2002
TSC-04-03	Emergency Physical Change Index	F	08-29-2000
TSC-07-01	Head Venting Calculation	G	06-20-2002
TSC-08A-01	Steam Release Data Sheet (Energy Balance)	H	12-14-2001
TSC-08A-02	Steam Release Calculation Sheet (Energy Balance)	G	12-14-2001
TSC-08A-03	Steam Release Data/Calculation Sheet (Open Valve)	E	12-14-2001
TSC-08A-04	Steam Release Data/Calculation Sheet (STMRLS Program)	D	12-14-2001
TSC-09A-01	Core Exit Thermocouple Data	D	05-16-2002
TSC-09A-02	Fuel Rod Clad Damage Estimate	D	05-16-2002
TSC-09A-03	Fuel Rod Overtemperature Damage Estimate	E	05-16-2002
TSC 9A.4	Core Damage Based on Activity Ratios	Deleted	05-16-2002
TSC-09A-05	Core Damage Assessment (Monitoring Data)	E	05-16-2002
TSC 9A.6	Core Damage Summary	Deleted	05-16-2002

<b>WISCONSIN PUBLIC SERVICE CORP.</b> <b>Kewaunee Nuclear Power Plant</b> <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-AD-15	Rev.	P		
		Title	Recovery Planning and Termination				
		Date	SEP 12 2002	Page 1 of 5			
Reviewed By		Jeanne Ferris		Approved By		W. L. Yarosz	
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

## 1.0 Purpose

- 1.1 This procedure provides instruction for terminating a declared emergency, establishing a recovery plan, restoring the plant to a normal operating status, and deactivating the Emergency Response Organization.
- 1.2 The goals of the recovery effort are to assess the in-plant consequences of the emergency, to assist the state with the intermediate and ingestion phase radiological operations and to initiate plant cleanup and repair operations.

## 2.0 General Notes

- 2.1 During a declared emergency, a point is reached when the plant will be placed in a stable condition. Factors which pose a threat to the health and safety of the general public shall be identified and controlled. These conditions could be attained even though specific Emergency Action Levels are exceeded. The Emergency Director, in conjunction with the Emergency Response Manager, shall determine that there is no longer a need to keep the emergency organization in effect. After a decision has been made to terminate the emergency, then plant recovery operations will begin.

## 3.0 Precautions and Limitations

- 3.1 None

## 4.0 Initial Conditions

- 4.1 This procedure shall be implemented upon declaration of an Unusual Event, Alert, Site Emergency, General Emergency, or when directed by the Shift Manager or Emergency Director.

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## 5.0 Procedure

### 5.1 Responsibilities

5.1.1 **Emergency Director, in conjunction with the Emergency Response Manager, shall determine:**

- 5.1.1.1 At the onset of an emergency condition, response action to mitigate the consequences of the accident takes precedence over recovery actions. The Emergency Response Manager may initiate some limited recovery operation during the response phase. Gradually, as the response effort begins to abate, recovery efforts gain more importance.
- 5.1.1.2 EPIP-AD-02 is not written to facilitate de-escalation, therefore, any decision to de-escalate shall be based on a thorough review of EPIP-AD-02 to determine whether any EAL applies to current plant conditions.
- 5.1.1.3 It is not required to de-escalate from an emergency action level. Moving from a given action level directly into recovery is preferable. However, there may be occasions when it is more appropriate to de-escalate.
- 5.1.1.4 Refer to and review Section 9 of the Kewaunee Nuclear Power Plant Emergency Plan.
- 5.1.1.5 Review any procedures specific to the emergency necessary to supplement this procedure.
- 5.1.1.6 Evaluate the status of emergency conditions and determine at what point in time the emergency organization can be secured and return to the normal plant and corporate organization. Evaluate plant damage and on-site radiological clean-up operations needed. Evaluate off-site radiological impact that may have occurred or may continue during the recovery operation.
- 5.1.1.7 Determine the manpower, equipment, and materials needed to start the recovery operation.
- 5.1.1.8 Make recommendations to the Site Vice President concerning who would be best suited to fill the positions of Recovery Manager and Environmental Liaison (if needed).

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### 5.1.2 Recovery Manager

- 5.1.2.1 Works with appropriate plant and corporate personnel to formulate a recovery plan which will return the Plant to a normal operating status.
- 5.1.2.2 Maintain routine contact with all appropriate Federal, State, and Local Agencies concerning recovery operations until the recovery is terminated.
- 5.1.2.3 Oversee the recovery operation based on guidance stated in Section 5.2.2 below.
- 5.1.2.4 Ensures that all new procedures are reviewed by Plant Operations Review Committee (PORC) prior to use.

### 5.1.3 Environmental Liaison (if designated)

- 5.1.3.1 Coordinate all environmental radiological sampling and analysis performed by Nuclear Management Company (NMC) staff contracted environmental monitoring personnel.
- 5.1.3.2 Maintain contact with Federal, State, and Local Agencies performing environmental radiological sampling within the EPZ.
- 5.1.3.3 Obtain sample results from Federal, State, and Local Agencies and compare these results to NMC obtained sample results.

## 5.2 Requirements

- 5.2.1 **Securing the Emergency Organization:** The Emergency Director, in conjunction with the Emergency Response Manager, will review and address the items listed below prior to securing the emergency organization.
  - 5.2.1.1 The plant is in a shutdown condition and/or there is no apparent likelihood that the initial emergency situation will recur or that further plant degradation will develop.
  - 5.2.1.2 Radiation levels in affected in-plant areas are stable or decreasing.
  - 5.2.1.3 Releases of radioactive material to the environment greater than Technical Specifications have ceased.
  - 5.2.1.4 Containment pressure is steady or decreasing.

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- 5.2.1.5 The reactor is in a safe shutdown condition and long-term core cooling is established or is capable of normal operations within Technical Specifications. Verify shutdown margin as required by Technical Specifications for the core has been established. Evaluate the possibility of an uncoolable core.
- 5.2.1.6 Any fire, flood, earthquake, or similar emergency conditions are controlled or have ceased.
- 5.2.1.7 All required emergency notifications have been completed.
- 5.2.1.8 There is no longer a need for the full activation of the emergency response organization or emergency response facilities.
- 5.2.2 Recovery Operation: The Manager - Kewaunee Plant and the Recovery Manager will remain cognizant of the items listed below during the recovery operation.
  - 5.2.2.1 Appropriate off-site authorities shall be informed of the recovery organization and plans, including communication links to be used.
  - 5.2.2.2 The declared emergency will be investigated and documented through the Licensee Event Report (LER) system in accordance with NAD-11.08, "Action Request Process."
  - 5.2.2.3 When completed, a copy of the event LER shall be sent to:
    - a. The NRC
    - b. The State of Wisconsin, Wisconsin Emergency Management
    - c. The Kewaunee County Emergency Government
    - d. The Manitowoc County Emergency Management
  - 5.2.2.4 Procedures or procedure changes instituted to respond to the emergency shall be evaluated for their applicability prior to use during the recovery process.
  - 5.2.2.5 Plant accountability and access control status will be reviewed and appropriate procedures implemented.
  - 5.2.2.6 The PORC shall review all nuclear safety related procedures written to effect plant recovery.
  - 5.2.2.7 An estimation of the total population radiation exposure will be calculated for any and all releases of radioactive material that took place during the declared emergency. The analysis will be performed using established procedures and using Regulatory Guide 1.109 as a reference.

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## 6.0 Final Conditions

- 6.1 Recovery operations may be terminated and the plant returned to a normal operating status after the Site Vice President is confident that the plant can be maintained within Technical Specifications.

## 7.0 References

- 7.1 EPIP-AD-02, Emergency Class Determination
- 7.2 NAD-11.08, Action Request Process
- 7.3 NRC Inspection Report 88-11 (COMTRAK 88-067)
- 7.4 Kewaunee Nuclear Power Plant Emergency Plan, Section 9
- 7.5 Kewaunee Nuclear Power Plant Technical Specifications and Operating License
- 7.6 Kewaunee Nuclear Power Plant USAR
- 7.7 Title 10 Code of Federal Regulations Parts 20 and 50, Appendix E
- 7.8 NRC Inspection Report K-87-195
- 7.9 EPIP-RET-09, Post-Accident Population Dose

## 8.0 Records

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

8.1.1 QA Records

None

8.1.2 Non-QA Records

None