

NRC-03-014

10 CFR 50, App E

February 24, 2003

U.S. Nuclear Regulatory Commission  
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Washington, DC 20555

KEWAUNEE NUCLEAR POWER PLANT  
DOCKET 50-305  
LICENSE No. DPR-43  
RADIOLOGICAL EMERGENCY RESPONSE PLAN IMPLEMENTING PROCEDURES

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

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



Thomas Coutu  
Site Vice-President, Kewaunee Plant

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/o attach.

# DOCUMENT TRANSMITTAL

KEWAUNEE NUCLEAR POWER PLANT

FROM: DIANE FENCL - KNPP

TRANSMITTAL DATE 02-18-2003

## EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

### OUTSIDE AGENCY COPIES (1-20)

S. Campion - NRC Document Control Desk (1)\*  
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S. Campion - NRC Resident Inspector (4) (receives Appx. A phone numbers)\*  
S. Campion - State of Wisconsin (5)\*  
S. Campion - 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)  
S. Zutz - SBF/SEC (114)  
D. Krall - CR/Communicator (116)(Partial Distribution)

Simulator/Communicator (117)  
M. Fencl - Security (121)  
S. Zutz - 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  
 February 18, 2003**

Please follow the directions listed below.

EPIP Index, dated 02-18-2003.

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-05	D	EPIP-AD-05	E
EPIP-RET-03	O	EPIP-RET-03	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 Jeanne Ferris ext. 8545.

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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EPIP-AD-02	Emergency Class Determination	AE	11-26-2002
EPIP-AD-03	KNPP Response to an Unusual Event	AG	01-20-2003
EPIP-AD-04	KNPP Response to Alert or Higher	AL	01-20-2003
EP-AD-5	Site Emergency	Deleted	04-27-87
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	E	02-18-2003
EP-AD-6	General Emergency	Deleted	04-24-87
EPIP-AD-07	Initial Emergency Notifications	AS	01-20-2003
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
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EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
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EPIP-AD-15	Recovery Planning and Termination	P	09-12-2002
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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
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EPIP-ENV-04D	Plume Tracking for Environmental Monitoring Teams	O	08-20-2002
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EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	<b>Deleted</b>	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	<b>Deleted</b>	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	<b>Deleted</b>	03-23-84
EP-ENV-7	Site Access Facility Communications	<b>Deleted</b>	09-26-84
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EPIP-EOF-11	Internal Communication and Documentation Flow	V	11-07-2002
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EPIP-TSC-07	RV Head Venting Time Calculation	J	06-20-2002
EPIP-TSC-08A	Calculations for Steam Release from Steam Generators	O	11-26-2002
EPIP-TSC-08B*	STMRLS Computer Program	G	06-20-2002
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* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			
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* 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-APPX-A-06	EP-FIG-022	APPX-A-06-04	EOF - WPSC D2-3 Floor Plan	C	10-30-2001
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EPIP-OSF-02	EP-FIG-039	OSF-02-01	High Priority Work	A	10-02-2001
EPIP-OSF-02	EP-FIG-039A	OSF-02-02	Lower Priority Work	A	10-02-2001
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AD-07-03	Fax Event Notice	A	01-20-2003
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ENV-02-01	EMT Activation Checklist	N	08-20-2002
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EOF-02-02	EOF Deactivation Checklist	N	01-28-2003
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EOF-04-02	Telephone Communications Log Sheet	A	12-14-2001
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RET-04-01	SAM-2 Counting Equipment Worksheet	E	06-12-2001
RET 8.3	Hospital Survey 1	Deleted	06-05-2001
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TSC-02-03	Emergency Response Data System (ERDS) Link Initiation Checklist	H	01-20-2003
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TSC-03-02	Plant Equipment Status	L	06-12-2001
TSC-03-03	Environmental Status Board	J	06-12-2001
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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
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TSC-08A-03	Steam Release Data/Calculation Sheet (Open Valve)	E	12-14-2001
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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>		<b>No.</b> EPIP-AD-05	<b>Rev.</b> E
		<b>Title</b> Emergency Response Organization Shift Relief Guideline	
<i>Emergency Plan Implementing Procedure</i>		<b>Date</b> FEB 18 2003	<b>Page</b> 1 of 5
<b>Reviewed By</b> <u>Jeanne Ferris</u>		<b>Approved By</b> <u>Bill Bartelme</u>	
<b>Nuclear Safety Related</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>PORC Review Required</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>SRO Approval Of Temporary Changes Required</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

## 1.0 Purpose

- 1.1 This procedure provides instruction for conducting shift relief of the Emergency Response Organization (ERO) and support staff during a declared emergency.

## 2.0 General Notes

- 2.1 The shift relief process is a method used by ERO members and supporting plant staff to provide relief from their emergency response tasks by personnel replacement while maintaining the functions of the emergency organization.

## 3.0 Precautions and Limitations

- 3.1 None

## 4.0 Initial Conditions

- 4.1 This procedure should be implemented during the preparation for, conduct of, and closure of a shift relief when a plant emergency of alert or higher has been declared or when directed by the Emergency Director or Emergency Response Manager.

## 5.0 Procedure

### Note

*Operating Crews in the Control Room will follow established Operation's shift relief procedures.*

### 5.1 Directors shall:

#### 5.1.1 Prepare for shift relief

- 5.1.1.1 Determine the level of ERO support needed for your area of responsibility for the next shift.
- 5.1.1.2 Identify the individual(s) available for comprising the relief shift. Sources include individuals sent home at the start of the event for relief and individuals who were not available when the initial event notification was made.
- 5.1.1.3 Identify a location (preferably outside the response facility) where briefings and debriefings can be conducted.

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- 5.1.1.4 With the concurrence of the Emergency Director, set a relief shift briefing date and time.
- 5.1.1.5 Obtain information from the Site Protection Director concerning travel routes to or from the plant through Kewaunee and Manitowoc Counties in areas that have been evacuated.
- 5.1.1.6 Instruct the ERO members under your direction to contact their ERO position's relief to provide them with relief briefing date, time, and travel route instructions.
- 5.1.2 Conduct a shift relief briefing
  - 5.1.2.1 Gather all relief shift personnel in the designated location.
  - 5.1.2.2 Provide a briefing that includes, but is NOT limited to:
    - Brief history of the event and milestones
    - Current plant status
    - Hazards associated with current plant status
    - Potential for changes that may affect the safety of employees
    - Expected relief shift activities
  - 5.1.2.3 Send relief staff to their respective workstations in small numbers, so that the operation of the facility as a whole is not disrupted.
- 5.1.3 Conduct a debriefing for the off-going shift
  - 5.1.3.1 Gather all off-going ERO members in the designated location.
  - 5.1.3.2 Designate an individual to record comments made by the off-going shift.
  - 5.1.3.3 Provide an opportunity for all members to identify problems, concerns, and strengths encountered during the shift just completed.
    - Communications
    - Safety
    - Procedure Issues
    - Job Performance Improvement Opportunities
  - 5.1.3.4 Ensure a copy of the recorded comments are given to the on-coming facility directors, and a copy for the event file created in each facility.

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5.1.3.5 Inform the off-going shift of travel routes and monitoring expectations established by Kewaunee and Manitowoc Counties for evacuated areas around the plant.

5.1.3.6 Inform the off-going shift of their anticipated return time. If this is not known, ensure a list of phone numbers is available for off-going staff so they can be notified of information about the next shift.

5.1.4 WHEN all workstations in the facility have been relieved, conduct a facility briefing to review current conditions, activities, and priorities.

5.1.5 IF Final Conditions (Section 6.0) have NOT been met, THEN return to Step 5.1.

5.1.6 IF Final Conditions (Section 6.0) have been met, THEN stop using this procedure.

5.2 The Site Protection Director (or designee) shall:

5.2.1 WHEN directed by the Emergency Director, coordinate the movement of the shift personnel to and from the Kewaunee Nuclear Power Plant (KNPP).

5.2.2 Review relief shift report location(s), time, and expected routes into the plant with Directors in the Technical Support Center (TSC).

**!! Caution !!**

*Plant staff being relieved shall follow the evacuation and reception center check-in requirements of either the Kewaunee County Emergency Government or Manitowoc County Emergency Management when leaving the plant.*

5.2.3 Contact the Kewaunee County Emergency Operations Center (EOC) to decide appropriate ingress and egress route(s) for the plant through Kewaunee County.

- a. Ask for Law Enforcement.
- b. Determine the best routes through Kewaunee County and the EPZ traffic checkpoints.
- c. Discuss approximate number of people needing ingress and egress of the plant and the approximate time.
- d. Discuss the appropriate mode of transportation (car, bus, etc.).
- e. Determine county contact points for coordinating an entrance or exit from the EPZ.

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- 5.2.4 Contact the Manitowoc County Emergency Operations Center (EOC) to decide appropriate ingress and egress route(s) for the plant through Manitowoc County.
- a. Ask for the Sheriff.
  - b. Determine the best routes through Manitowoc County and the EPZ traffic checkpoints.
  - c. Discuss approximate number of people needing ingress and egress of the plant and the approximate time.
  - d. Discuss the appropriate mode of transportation (car, bus, etc.).
  - e. Determine county contact points for coordinating an entrance or exit from the EPZ.

5.2.5 IF bus transportation is needed, THEN contact the Administrative Logistics Director in the Emergency Operations Facility (EOF) to arrange for this service.

5.2.6 Provide the information from Steps 5.2.3 through 5.2.5 to all ERO Directors.

5.2.7 Review AND implement procedure EPIP-SEC-05, "Personnel Evacuation," for staff who will be leaving the plant.

5.2.8 IF Final Conditions (Section 6.0) have NOT been met, THEN return to Step 5.2.

5.2.9 IF Final Conditions (Section 6.0) have been met, THEN stop using this procedure.

**5.3 All ERO members and support staff shall:**

5.3.1 WHEN directed, contact your relief person and give them the following information:

- Reporting location (facility or a designated staging area)
- The route to take to the reporting location
- The time to be at the reporting location

5.3.2 WHEN your relief arrives, perform a one-on-one turnover paying particular attention to:

- Status of events and activities related to the position
- Hazards associated with current plant status
- Potential for changes that may affect the safety of employees
- Events and activities that will carry forward into the next shift
- Events and activities to be initiated during the next shift

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5.3.3 Work side-by-side for as long as needed to ensure continuity of effort.

5.3.4 Meet for a debriefing with the off-going shift at a location designated by your director.

5.3.5 Provide a phone number where the person relieving you can contact you while off duty.

## 6.0 Final Conditions

6.1 The Emergency Response Manager has determined that shift rotation will not be required, or the plant emergency has been closed out, or recovery actions have begun and the Emergency Response Manager has suspended the use of EPIPs.

## 7.0 References

7.1 EPIP-SEC-05, Personnel Evacuation

## 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

- Comments recorded in Step 5.1.3.2

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Reviewed By			Bill Bartelme			
Approved By			Bill Bartelme			
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 defining the responsibilities and requirements of the Chemistry Emergency Team.

## 2.0 General Notes

- 2.1 None

## 3.0 Precautions and Limitations

- 3.1 None

## 4.0 Initial Conditions

- 4.1 This procedure shall be implemented during an **Alert, Site Emergency, General Emergency**, or if requested by the Radiological Protection Director (RPD) or the Emergency Director (ED).

## 5.0 Procedure

### 5.1 Responsibilities

- 5.1.1 The **Chemistry Emergency Team** is responsible for performing the chemical analysis necessary for the determination of shutdown margin, extent of liquid effluent releases, extent of core damage, and conditions in the various building sumps and other liquid waste collection points.
- 5.1.2 In the event of a chemical spill, the **Chemistry Emergency Team** is responsible for assessment, control, and clean-up.
- 5.1.3 The **Chemistry Emergency Team** is also responsible for all operation of the Containment Air Sample Panel and Containment Hydrogen Analyzer.
- 5.1.4 Any analyses where expected dose to the team member is greater than 10CFR20 limits must be authorized by an Emergency Radiation Work Permit (See EPIP-AD-11).

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## 5.2 Requirements

5.2.1 The following initial actions shall be taken upon activation of the Chemistry Emergency Team.

5.2.1.1 If off-site, report to the plant in accordance with EPIP-AD-03 or EPIP-AD-04.

5.2.1.2 Report to the Radiation Protection Office (or Radiological Analysis Facility) and contact the RPD for information on what chemistry samples are required.

5.2.1.3 Request habitability assessment from HP for the High Rad Sample Room, Hot Chem Lab, and Cold Chem Lab.

5.2.2 When directed by the ED or RPD, take the following samples per EPIP-RET-03C:

5.2.2.1 Diluted liquid sample of primary coolant for:

- Boron analysis
- Gamma isotopic analysis

5.2.2.2 An inline liquid sample for:

- pH
- Oxygen
- Conductivity
- Chlorides

5.2.2.3 An inline undiluted gas sample for hydrogen analysis.

5.2.2.4 A diluted gas sample for gamma isotopic analysis.

5.2.2.5 An undiluted liquid sample for off-site analysis.

5.2.2.6 Initiate operation of 1A and 1B Hydrogen Analyzers for Containment.

5.2.3 When directed by the ED or RPD, take steam generator samples to determine primary-secondary leakage and release to the environment.

5.2.4 Characterize liquid effluent release paths.

5.2.5 Analyze various building sumps for assessment of radiological hazards.

5.2.6 Assist in analysis of environmental samples.

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

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## 6.0 Final Conditions

- 6.1 Plant Emergency has been Terminated or Recovery actions have begun and the Emergency Response Manager has suspended the use of EIPs.

## 7.0 References

7.1 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline

7.2 EPIP-AD-11, Emergency Radiation Controls

### 7.3 Implementing Procedures

7.3.1 EPIP-RET-03A, Liquid Effluent Release Paths

7.3.2 EPIP-RET-03C, Post-Accident Operation of the High Radiation Sample Room

7.3.3 EPIP-RET-03D, Containment Air Sampling Analysis Using CASP

## 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