

NRC-03-021

10 CFR 50, App. E

March 10, 2003

U.S. Nuclear Regulatory Commission
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KEWAUNEE NUCLEAR POWER PLANT
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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.



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 03-06-2003

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

OUTSIDE AGENCY COPIES (1-20)

S. Campion - NRC Document Control Desk (1)*
S. Campion - NRC Region III (2, 3)*
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)

W. Bartelme (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)(Partial Distribution)
W. Galarneau - SBF/ENV (108, 109)(Partial Distribution)
W. Galarneau - SBF/EM Team (110, 111, 111A)(Partial Distribution)
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.**

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| EP-AD-10 | Notification of General Emergency | Deleted | 04-27-87 |
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| EP-AD-13A | Limited Area Evacuation | Deleted | 03-01-83 |
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| EP-ENV-3D | Revision and Control of ISODOSE II | Deleted | 02-14-95 |
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| EP-ENV-5A | LCS-1 Operation | Deleted | 04-14-86 |
| EP-ENV-5B | MS-3 Operation | Deleted | 04-14-86 |
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| EP-OSF-1 | Operation Support Facility Emergency Organization | Deleted | 04-24-87 |
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| EPIP-RET-02B | Gaseous Effluent Release Path, Radioactivity, and Release Rate Determination | S | 08-06-2002 |
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| EPIP-SEC-03 | Personnel Assembly and Accountability | AF | 11-26-2002 |
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| EPIP-TSC-04 | Emergency Physical Changes, Major Equipment Repair | N | 05-09-2002 |
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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 |
| 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 |
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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-03 | Off-Site Telephone Numbers | Deleted | 02-06-2002 |
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| AD-18-01 | Airborne Radioiodine Dose Accountability and Potassium Iodide Distribution | B | 08-06-2002 |
| AD-18-02 | Record of Known Allergy To or Voluntary Refusal to Take Potassium Iodide | A | 02-27-2002 |
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| EOF-08-05 | Plant Emergency Status Report | A | 11-27-2001 |
| EOF-08-06 | Radiological Status Report | E | 01-20-2003 |
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| OSF-03-01 | Operational Support Facility Team Briefing | C | 12-04-2001 |
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| RET-02B-01 | Containment Stack Release (Grab Sample) | D | 08-06-2002 |
| RET-02B-02 | Auxiliary Building Stack (Grab Sample) | D | 08-06-2002 |
| RET-02B-03 | Auxiliary Building Stack (Sping Reading) | D | 08-06-2002 |
| RET-02B-04 | Containment Stack (Sping Reading) | C | 08-06-2002 |
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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-02-02 | TSC Ventilation Checklist | I | 01-20-2003 |
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| TSC-02-04 | TSC Chart Recorder Operation Checklist | E | 01-20-2003 |
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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 |
| 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 |
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| 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 |

EVENT NOTICE

NUCLEAR ACCIDENT REPORTING SYSTEM FORM (NARS)

ROLL-CALL

State Warning Center I or II _____ (Time) Kewaunee Co _____ (Time) Manitowoc Co. _____ (Time)

“This is the Kewaunee Nuclear Site calling from the (circle one) CRTSC/EOF. An incident has occurred at our facility. Please record the following information on your Nuclear Accident Reporting System form.” (Read below Box 1 through Box 12)

| | | |
|--|---|---|
| 1. Reason For Call: <input type="checkbox"/> Initial Report <input type="checkbox"/> Emergency Classification Change <input type="checkbox"/> PAR Change | | |
| 2. STATUS <input checked="" type="checkbox"/> [A] Actual Event | 3. STATION/AFFECTED UNIT <input type="checkbox"/> [S] Kewaunee (Check plant) | |
| 4. ONSITE CLASSIFICATION <input type="checkbox"/> [A] Unusual Event <input type="checkbox"/> [B] Alert <input type="checkbox"/> [C] Site Area Emergency <input type="checkbox"/> [D] General Emergency <input type="checkbox"/> [E] Recovery <input type="checkbox"/> [F] Terminated | 5. TIME & DATE OF CLASSIFICATION / PAR CHANGE / TERMINATION <input type="checkbox"/> [A] Classification Time _____ Date _____ EAL Chart _____ <input type="checkbox"/> [B] Par Change Time _____ Date _____ <input type="checkbox"/> [C] Recovery/Termination Time _____ Date _____ | |
| 6. RELEASE STATUS ----- <input type="checkbox"/> [A] Unusual Event or Alert <input type="checkbox"/> [A1] NONE <input type="checkbox"/> [A2] OCCURRING <input type="checkbox"/> [A3] TERMINATED <input type="checkbox"/> [B] Site Area Emergency or General Emergency: <input type="checkbox"/> [B1] POTENTIAL <input type="checkbox"/> [B2] OCCURRING <input type="checkbox"/> [B3] TERMINATED | | 7. TYPE OF RELEASE <input type="checkbox"/> [A] NOT APPLICABLE <input type="checkbox"/> [B] AIRBORNE <input type="checkbox"/> [C] LIQUID |
| 8. WIND DIRECTION (15 minute average) FROM _____ DEGREES DOWNWIND SECTORS: A B C D E F G H J K L M N P Q R (Circle affected sectors.) | 9. WIND SPEED & STABILITY CLASS (Current 15 minute average.) MILES/HR : _____ STABILITY CLASS: A B C D E F G (Circle applicable stability class) | |
| 10. PROTECTIVE ACTION RECOMMENDATIONS <input type="checkbox"/> [A] NONE (UNUSUAL EVENT, ALERT, SITE AREA EMERGENCY) <input type="checkbox"/> [B] EVACUATE <u>ALL</u> SECTORS OUT TO _____ MILES (GENERAL EMERGENCY) EVACUATE DOWNWIND SECTORS _____ OUT TO _____ MILES | | |
| 11. ADDITIONAL INFORMATION (Minimum required, event description) _____ _____ _____ | | |

APPROVAL SIGNATURE _____ DATE / TIME APPROVED _____ / _____
(EMERGENCY DIRECTOR / EMERGENCY RESPONSE MANAGER)

12. EMERGENCY COMMUNICATOR _____ / _____
(Print/sign)

[D] Callback number: 920-388-0101

EVENT NOTICE

NUCLEAR ACCIDENT REPORTING SYSTEM FORM (NARS)

| | |
|--------------|--|
| NOTE: | DO NOT FAX THIS PAGE TO STATE AND LOCAL AUTHORITIES |
|--------------|--|

DIRECTIONS FOR FILLING OUT THE FORM

| | |
|---------|---|
| Box #1 | Reason For Call: Check appropriate. |
| Box #2 | Status is as checked. |
| Box #3 | Check plant. |
| Box #4 | Classification being declared. IF this is a PAR Change notification, THEN check the current classification. |
| Box #5 | Check the applicable event(s) and fill in the time and date. If a classification, fill in EAL chart letter. |
| Box #6 | Indicate whether a radioactive release is occurring. The definition of radioactive release is the release of radioactive material to the environment attributable to the emergency event. At a minimum, a potential radioactive release always exists at a SE and General Emergency because of the definition of SE and General Emergency. |
| Box #7 | Indicate whether there is an airborne or liquid radioactive release in progress. IF there is no release in progress, THEN Check Not Applicable. |
| Box #8 | Use the current Primary 10-meter 15-minute average MET DATA if reliable; OTHERWISE , use the backup 10 meter 15-minute average MET DATA or the Primary 60 meter 15-minute average MET DATA. <ol style="list-style-type: none"> 1. Fill the blank indicating the "From" wind direction. 2. Circle the appropriate downwind affected sectors using guidance of Table 1. |
| Box #9 | Use the current primary tower 10 meter 15-minute average MET DATA IF reliable; OTHERWISE , use the backup tower 10 meter, or primary tower 60 meter data. <ol style="list-style-type: none"> 1. Fill the blank indicating the current wind speed. 2. IF available, Circle the appropriate stability class. Use Delta-T for stability class IF reliable, OTHERWISE Primary or Backup Sigma Theta for stability class. Stability class can be found on the Control Room ARTO screen. Click on the "met data" icon in the bottom right corner and the screen that pops up will have stability class. |
| Box #10 | Indicate protective action recommendations. <ol style="list-style-type: none"> 1. For a General Emergency, indicate a PAR as directed by procedure EPIP-AD-03 or EPIP-AD-04 or EPIP-AD-19. 2. IF this is a PAR change, THEN include any previously chosen affected sectors to indicate all affected sectors. |
| Box #11 | <ol style="list-style-type: none"> 1. IF classifying an event, THEN at a minimum describe the EAL being implemented. 2. IF making a PAR change, THEN write "None", "PAR Change" or other applicable information related to the PAR. |

TABLE 1

| WIND DIRECTION (FROM) | AFFECTED DOWNWIND SECTORS |
|--|---------------------------|
| For any wind direction, if adverse meteorology (Use for block 10 "PAR" only) | ALL |
| >350 5-9 | HJK |
| >9-13 | HJKL |
| >13-31.5 | JKL |
| >31.5-35.5 | JKLM |
| >35.5-54 | KLM |
| >54-58 | KLMN |
| >58-76.5 | LMN |
| >76.5-80.5 | LMNP |
| >80.5-99 | MNP |
| >99-103 | MNPQ |
| >103-121.5 | NPQ |
| >121.5-125.5 | NPQR |
| >125.5-144 | PQR |
| >144-148 | PQRA |
| >148-166.5 | QRA |
| >166.5-170.5 | QRAB |
| >170.5-189 | RAB |
| >189-193 | RABC |
| >193-211.5 | ABC |
| >211.5-215.5 | ABCD |
| >215.5-234 | BCD |
| >234-238 | BCDE |
| >238-256.5 | CDE |
| >256.5-260.5 | CDEF |
| >260.5-279 | DEF |
| >279-283 | DEFG |
| >283-301.5 | EFG |
| >301.5-305.5 | EFGH |
| >305.5-324 | FGH |
| >324-328 | FGHI |
| >328-346.5 | GHJ |
| >346.5-350.5 | GHJK |

EVENT NOTICE

**TABLE 2
CONVERSION OF DELTA T AND SIGMA THETA**

| STABILITY CLASSIFICATION | PASQUILL CATEGORIES | SIGMA THETA ($\sigma\theta$) (DEGREES) | 60M - 10M DELTA T ($^{\circ}$ F/50M) |
|--------------------------|---------------------|--|---------------------------------------|
| Extremely Unstable | A | $\sigma\theta \geq 22.5$ | DELTA T ≤ -1.71 |
| Moderately Unstable | B | $22.5 > \sigma\theta \geq 17.5$ | $-1.71 < \text{DELTA T} \leq -1.53$ |
| Slightly Unstable | C | $17.5 > \sigma\theta \geq 12.5$ | $-1.53 < \text{DELTA T} \leq -1.35$ |
| Neutral | D | $12.5 > \sigma\theta \geq 7.5$ | $-1.35 < \text{DELTA T} \leq -0.45$ |
| Slightly Stable | E | $7.5 > \sigma\theta \geq 3.8$ | $-0.45 < \text{DELTA T} \leq 1.35$ |
| Moderately Stable | F | $3.8 > \sigma\theta \geq 2.1$ | $1.35 < \text{DELTA T} \leq 3.60$ |
| Extremely Stable | G | $2.1 > \sigma\theta$ | $3.60 < \text{DELTA T}$ |

FAX EVENT NOTICE

DATE: _____

Check

1. Send a fax broadcast of the "Event Notice," Form EPIPF-AD-07-01.
 - a. Dial "9-1(800) 839-6734" on the fax machine telephone receiver.
 - b. Follow the prompts and enter "1115947," (the seven digit mailbox number).
 - c. Enter "985947" (pin code).
 - d. Press "#."
 - e. Enter "008#" (broadcast list number).
 - f. Press "#" (immediate delivery).
 - g. Place the document in the fax machine, with fax cover sheet, Form EPIPF-EOF-08-03.
 - h. Press the "START" (or "FAX") button.
 - i. Hang up the telephone receiver.

2. IF the fax broadcast capability is lost, THEN send fax copies of the "Event Notice," Form EPIPF-AD-07-01, to the following locations individually:

| DESIGNATOR | REMOTE FAX LOCATION | REMOTE FAX NUMBER |
|------------|---------------------------------|--------------------|
| A or 1 | NRC Headquarters | 9-1 (301) 816-5151 |
| B or 2 | Wisconsin WEM (EOC) | 9-1 (608) 242-3299 |
| C or 3 | Wisconsin-Rad. Protection (EOC) | 9-1 (608) 242-3285 |
| D or 4 | DHFS Mobile Lab | 9-1 (920) 794-7388 |
| E or 5 | Kewaunee County EG (EOC) | 9-1 (920) 487-2963 |
| F or 6 | Manitowoc County EM (EOC) | 9-1 (920) 683-4568 |
| G or 7 | American Nuclear Insurance | 9-1 (860) 561-4655 |
| H or 8 | INPO | 9-1 (770) 644-8549 |
| I or 9 | Point Beach Admin | 9-1 (920) 755-6857 |
| J or 10 | KNPP TSC | 9-1 (920) 388-8396 |
| K or 11 | JPIC | 9-1 (920) 431-6428 |
| L or 12 | Point Beach CR | 9-1 (920) 755-6258 |
| M or 13 | NMC | 9-1 (715) 377-3355 |
| N or 14 | KNPP CR | 9-1 (920) 388-8817 |
| O or 15 | EOF | 9-1 (920) 433-7626 |

ERO EVENT NOTIFICATION
(Page 1 of 2)

DATE: _____

Check

Note

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

Note

To activate all of the pagers for Directors and select staff at an unusual event, you must repeat Steps 2 through 6 for the pager codes 9211 and 9222, and 9244 and 9255. WHEN directed, activate the radio pager codes which have been selected by the SM/ED or ERM.

1. Dial ext. "5213" on any WPSC PBX Telephone (extension xxxx). _____

2. IF the PBX phone system is inoperable, THEN:
 - Dial "1-920-617-5213" from a Kewaunee (388-xxxx) or other non Green Bay external telephone company exchange line, OR
 - Dial "617-5213" from any Green Bay (433-xxxx , 617-xxxx, etc.) external telephone company exchange, OR
 - Dial "9-1-920-617-5213" from a Centrex (431-xxxx) exchange located in the EOF.

3. IF the KNPP paging system is inoperable or unavailable, THEN go to Step 9. _____

4. WHEN the phone answers and responds with a single (1) beep, dial the pager access code selected below (the SM/ED or ERM must check one of the options below). _____
 - "9233" - ALERT or HIGHER EVENT (All emergency pager holders),
 - "9211" AND "9222"- UNUSUAL EVENT (Directors and Select Staff)
 - "9244" AND "9255" - CREDIBLE SECURITY THREAT
 - " _____ " - code(s) provided by the SM/ED or ERM (individual, fire, PORC etc.).

5. WHEN the phone responds with three (3) beeps, dial the message code selected below (the SM/ED or ERM must check one of the options below). _____
 - " _____ " - number provided by the SM/ED or ERM.
 - "66666" - UNUSUAL EVENT
 - "44666" - CREDIBLE SECURITY THREAT - UNUSUAL EVENT
 - "77777" - ALERT
 - "44777" - CREDIBLE SECURITY THREAT - ALERT
 - "88888" - SITE EMERGENCY
 - "99999" - GENERAL EMERGENCY
 - "44444" - TERMINATION OR RECOVERY

ERO EVENT NOTIFICATION

(Page 2 of 2)

Check

6. Press the “#” key. WHEN the phone responds with five (5) beeps, hang up. _____
7. IF another pager access code is to be activated, THEN return to Step 1. _____
8. Verify that the ERO control pager in the Control Room (or any ERO member’s pager) has activated and displays the message within 3-4 minutes. _____

Note

The following steps are to be used if the radio paging system is inoperable or significantly degraded outside of normal working hours.

Note

A Liaison should not accept responsibility for the ERO Call Tree unless they have immediate access to the KPB Emergency Telephone Directory.

Note

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

9. IF problems are encountered with the KNPP paging system, THEN use the alternate ERO notification method. _____
 - a. Call the State or County Liaisons listed in the Emergency Telephone Directory tab “KNPP ERO Call List,” ETD 01A, until two liaisons accept the ERO Call Tree responsibility.
 - b. Inform the first Liaison accepting the ERO Call Tree Task that a(n) (select one) Unusual Event, Alert, Site Emergency, General Emergency, or Credible Security Threat, was declared at _____ (time) and the ERO Call Tree Part “A” in the Emergency Telephone Directory tab “KNPP ERO Call List,” ETD 01A, should be activated.
 - c. Inform the second Liaison accepting the ERO Call Tree Task that a(n) (select one) Unusual Event, Alert, Site Emergency, General Emergency, or Credible Security Threat, was declared at _____ (time) and the ERO Call Tree Part “B” in the Emergency Telephone Directory tab “KNPP ERO Call List,” ETD 01A and tab “KPB ERO Call List,” ETD 01C, should be activated.