

NRC-03-036

10 CFR 50, App. E

March 31, 2003

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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.

A045

DOCUMENT TRANSMITTAL

KEWAUNEE NUCLEAR POWER PLANT

FROM: DIANE FENCL - KNPP

TRANSMITTAL DATE 03-18-2003

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

OUTSIDE AGENCY COPIES (1-20)

S. Campion - NRC Document Control Desk (1)*	Krista Kappelman - PBNP - EP (10)*
S. Campion - NRC Region III (2, 3)*	Craig Weiss - Alliant Energy (11)*
S. Campion - NRC Resident Inspector (4) (receives Appx. A phone numbers)*	Jill Stern - Nuclear Management Company (12)*
S. Campion - State of Wisconsin (5)*	Chuck Zoia - NRC Region III (13)*
S. Campion - KNPP QA Vault (NRC Letter & Memo Only) (15)*	

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.**

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

PROC. NO.	TITLE	REV.	DATE
EP-AD			
EPIP-AD-01	Personnel Response to the Plant Emergency Siren	K	11-26-2002
EPIP-AD-02	Emergency Class Determination	AF	03-18-2003
EPIP-AD-03	KNPP Response to an Unusual Event	AH	03-18-2003
EPIP-AD-04	KNPP Response to Alert or Higher	AM	03-18-2003
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	AT	03-18-2003
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
EPIP-AD-11	Emergency Radiation Controls	S	12-19-2002
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
EPIP-AD-18	Potassium Iodide Distribution	P	02-27-2002
EPIP-AD-19	Protective Action Guidelines	S	01-20-2003

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

PROC. NO.	TITLE	REV.	DATE
EPIP-AD-20	KNPP Response to a Security Threat	D	01-20-2003
EP-ENV			
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
EP-ENV-3H	Protective Action Recommendations	Deleted	04-13-90
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
EP-ENV-5E	Reuter-Stokes Operation	Deleted	08-27-85

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

PROC. NO.	TITLE	REV.	DATE
EP-ENV-6	Data Analysis, Dose Projections and Protective Action Recommendations	Deleted	12-21-81
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
EP-EOF			
EP-EOF-1	Corporate Emergency Response Organization	Deleted	03-11-94
EPIP-EOF-02	Emergency Operations Facility (EOF) Activation	AA	08-06-2002
EPIP-EOF-03	EOF Staff Action for Unusual Event	AD	01-20-2003
EPIP-EOF-04	EOF Staff Action for Alert or Higher	AK	01-20-2003
EP-EOF-5	Corporate Staff Action for Site Emergency	Deleted	04-24-87
EP-EOF-6	Corporate Staff Action for General Emergency	Deleted	04-24-87
EP-EOF-7	Notification of Unusual Event	Deleted	04-06-94
EP-EOF-8	Relocation of EOF	Deleted	03-01-83
EPIP-EOF-08	Continuing Emergency Notifications	Z	01-28-2003
EP-EOF-9	Interface with Support Organizations	Deleted	03-05-84
EP-EOF-9	Notification of Site Emergency	Deleted	04-24-87
EP-EOF-10	Notification of General Emergency	Deleted	04-24-87
EPIP-EOF-11	Internal Communication and Documentation Flow	V	11-07-2002
EPIP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center Security	Q	06-20-2002

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

PROC. NO.	TITLE	REV.	DATE
EP-OP			
EP-OP-1	Control Room Emergency Organization	Deleted	04-24-87
EP-OP-2	Emergency Control Room Activation for Emergency Response	Deleted	04-24-87
EP-OP-3	Control Room Communications	Deleted	04-24-87
EP-OSF			
EP-OSF-1	Operation Support Facility Emergency Organization	Deleted	04-24-87
EPIP-OSF-02	Operational Support Facility Operations	V	11-26-2002
EPIP-OSF-03	Work Orders During an Emergency	P	05-09-2002
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
EPIP-OSF-04	Search and Rescue	E	05-23-2002
EP-RET			
EP-RET-1	Radiation Emergency Team Organization	Deleted	04-16-96
EPIP-RET-02	In-Plant Radiation Emergency Team	V	05-23-2002
EPIP-RET-02A	Radiation Protection Office/Radiological Analysis Facility (RPO/RAF) Activation	U	11-07-2002
EPIP-RET-02B	Gaseous Effluent Release Path, Radioactivity, and Release Rate Determination	S	08-06-2002
EP-RET-2C	Containment Air Sampling and Analysis	Deleted	03-01-83
EPIP-RET-02D	Emergency Radiation Entry Controls and Implementation	M	06-12-2001
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
EP-RET-2F	Personnel Decontamination	Deleted	04-13-90
EPIP-RET-03	Chemistry Emergency Team	P	02-18-2003
EPIP-RET-03A	Liquid Effluent Release Paths	L	11-29-2001
EP-RET-3B	Post-Accident Reactor Coolant Alternate Sampling Procedure	Deleted	01-25-88

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

PROC. NO.	TITLE	REV.	DATE
EPIP-RET-03C	Post Accident Operation of the High Radiation Sample Room	P	01-15-2002
EPIP-RET-03D	Containment Air Sampling Analysis Using CASP	N	01-15-2002
EP-RET-3E	Post Accident Operation of High Rad Sample Room Inline Multiported Count Cave	Deleted	08-27-85
EPIP-RET-04	SBF Activation	T	10-17-2002
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
EP-RET-4C	Site Radiological Monitoring	Deleted	07-12-94
EP-RET-4D	SAM-II Operation	Deleted	07-12-94
EP-RET-5	Plume Projection	Deleted	09-26-84
EPIP-RET-05	Site Boundary Dose Rates During Controlled Plant Cooldown	H	10-09-2001
EP-RET-5A	Plume Projection	Deleted	04-27-87
EP-RET-6	Dose Projection	Deleted	04-24-87
EP-RET-7	Radiological Analysis Facility/Radiation Protection Office Communications	Deleted	04-24-87
EPIP-RET-08	Contamination Control of the Aurora Medical Center	Deleted	05-23-2002
EPIP-RET-09	Post-Accident Population Dose	L	04-16-2002
EP-SEC			
EP-SEC-1	Security Organization	Deleted	04-24-87
EPIP-SEC-02	Security Force Response to Emergencies	Y	11-14-2002
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EPIP-SEC-03	Personnel Assembly and Accountability	AF	11-26-2002
EPIP-SEC-04	Security Force Actions for Dosimetry Issue	P	10-02-2001

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

PROC. NO.	TITLE	REV.	DATE
EP-SEC-5	Security Force Response to the EOF	Deleted	07-28-88
EPIP-SEC-05	Personnel Evacuation	G	06-20-2002
EP-TSC			
EPIP-TSC-01	Technical Support Center Organization and Responsibilities	S	01-28-2003
EPIP-TSC-02	Technical Support Center Activation	U	01-20-2003
EPIP-TSC-03	Plant Status Procedure	V	10-09-2001
EPIP-TSC-04	Emergency Physical Changes, Major Equipment Repair	N	05-09-2002
EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
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
EPIP-TSC-09A*	Core Damage Assessment	J	05-16-2002
EPIP-TSC-09B*	CORE Computer Program	Deleted	05-16-2002
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.			
EPIP-TSC-10	Technical Support for IPEOPs	K	05-09-2002

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

FIGURES					
EPIP	FIG #	Figure EPIPF	DESCRIPTION	REV.	DATE
EP-SEC-5 EPIP-APPX-A-06	EP-FIG-003	APPX-A-06-03	Technical Support Center - KNP Floor Plan	B	06-12-2001
EPIP-APPX-A-06	EP-FIG-005	APPX-A-06-02	Site Boundary Facility - KNP Floor Plan	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-008	APPX-A-06-01	Radiological Analysis Facility - KNP Floor Plan	A	10-31-2000
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
EPIP-APPX-A-06	EP-FIG-012	APPX-A-06-08	State/County Work Area - WPSC D2-1 Floor Plan	C	10-31-2000
EPIP-APPX-A-06	EP-FIG-013	APPX-A-06-09	NRC Work Area - WPSC D2-4 Floor Plan	A	10-31-2000
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
APPX-A-6	EP-FIG-034	---	Floor Plan - Media Briefing Center	Deleted	08-04-98
EPIP-EOF-12 EPIP-APPX-A-06	EP-FIG-035	APPX-A-06-06	General Office Building - WPSC (1st Floor) Floor Plan	C	10-24-2000
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
EPIP-OSF-02	EP-FIG-039A	OSF-02-02	Lower Priority Work	A	10-02-2001
EPIP-APPX-A-06	EP-FIG-043	APPX-A-06-10	JPIC - Federal Work Area - WPSC D2-9	B	12-21-2001
EPIP-APPX-A-06	EP-FIG-044	APPX-A-06-07	JPIC - State and County Work Area - WPSC D2-8	C	12-21-2001
EPIP-APPX-A-06	EP-FIG-045	APPX-A-06-05	JPIC - Utility Work Area - WPSC D2-7	C	12-21-2001
RET-08	EP-FIG-046	RET-08-01	Aurora Medical Center Location	Deleted	05-23-2002
EPIP-APPX-A-02	---	APPX-A-02-01	ERO Call Tree	Deleted	12-04-2001

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

NUMBER	TITLE	REVISION	DATE
	APPENDIX A		
APPX-A-1	Communication System Description	AF	08-04-98
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

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

FORM EPIPF	TITLE	REV.	DATE
APPENDIX B			
EP-AD			
AD-07-01	Event Notice - Nuclear Accident Reporting System Form (NARS)	U	03-06-2003
AD-07-02	State Call-Back - Question Guideline	C	11-15-2001
AD-07-03	Fax Event Notice	B	03-06-2003
AD-07-04	ERO Event Notification	B	03-06-2003
AD-11-01	Emergency Radiation Work Permit	H	12-19-2002
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
EP-ENV			
ENV-01-01	Environmental Dispatch Area Activation Checklist	D	10-31-2000
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
ENV-02-01	EMT Activation Checklist	N	08-20-2002
EP-EOF			
EOF-02-01	EOF Activation Checklist	T	08-06-2002
EOF-02-02	EOF Deactivation Checklist	N	01-28-2003
EOF-04-01	SRCL Initial Action Checklist	D	01-20-2003
EOF-04-02	Telephone Communications Log Sheet	A	12-14-2001
EOF-08-03	Fax for Emergency Declaration or Status Updates	H	01-20-2003
EOF-08-05	Plant Emergency Status Report	A	11-27-2001
EOF-08-06	Radiological Status Report	E	01-20-2003
EOF-11-02	Operating Status	G	11-07-2002

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

FORM EPIPF	TITLE	REV.	DATE
EOF-11-03	Environmental Status Board	G	11-07-2002
EOF-12-01	I.D. Badge Registration Form	G	10-24-2000
EP-OSF			
OSF 2.2	Maintenance Work in Progress	Deleted	07-08-98
OSF-03-01	Operational Support Facility Team Briefing	C	12-04-2001
EP-RET			
RET-02A-02	Emergency Sample Worksheet	E	06-05-2001
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
RET-02B-05	Steam Release	D	08-06-2002
RET-02B-06	Field Reading (Grab Sample)	B	08-06-2002
RET-04-01	SAM-2 Counting Equipment Worksheet	E	06-12-2001
RET 8.3	Hospital Survey 1	Deleted	06-05-2001
RET 8.4	Hospital Survey 2	Deleted	07-25-97
RET 8.5	Hospital Survey 3	Deleted	07-25-97
RET-08-06	Hospital Survey 4	Deleted	05-23-2002
RET-09-01	Post-Accident TLD Record Sheet	D	04-16-2002
EP-SEC			
SEC-03.01	Emergency Accountability Log	A	03-28-2000
SEC-04-01	Emergency Dosimeter Log	G	06-20-2002
EP-TSC			
TSC-01.01	Plant Status Summary for SAM Implementation	C	01-28-2003
TSC-01.02	Severe Accident Management Summary and Strategy Recommendation	B	02-06-2002

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 03-18-2003

FORM EIPF	TITLE	REV.	DATE
TSC-01.03	Severe Accident Management – Status	B	02-06-2002
TSC-02-01	TSC and OSF Activation Checklist	P	01-20-2003
TSC-02-02	TSC Ventilation Checklist	I	01-20-2003
TSC-02-03	Emergency Response Data System (ERDS) Link Initiation Checklist	H	01-20-2003
TSC-02-04	TSC Chart Recorder Operation Checklist	E	01-20-2003
TSC-02-05	TSC and OSF De-Activation Checklist	C	01-28-2003
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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No. EPIP-AD-02	Rev. AF
		Title Emergency Class Determination	
		Date MAR 18 2003	Page 1 of 21
Reviewed By Dave Mielke		Approved By Rick Repshas	
Nuclear Safety Related	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	PORC Review Required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		SRO Approval Of Temporary Changes Required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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 de-escalate 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 Once indication is available that an emergency action level has been exceeded, classification must be made as soon as possible and must not exceed 15 minutes. Once a classification has been declared, notification must be initiated and in progress to the State and County agencies within 15 minutes of event classification using "Event Notice," Form EPIPF-AD-07-01. During the initial 15-minute classification assessment, there may be rapidly changing conditions. Classification during this initial period should be based on currently available plant status.

4.0 Initial Conditions

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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-02	Rev. AF
	Title Emergency Class Determination	
	Date MAR 18 2003	Page 2 of 21

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 IF a plant emergency exists, THEN 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, THEN return to Step 5.2.
- 5.6 IF Final Conditions (Section 6.0) are not met, THEN return to Step 5.3.
- 5.7 IF Final Conditions (Section 6.0) are met, THEN 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. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-02	Rev. AF
	Title Emergency Class Determination	
	Date MAR 18 2003	Page 3 of 21

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 QA Records

- 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	B	9
Primary Leak to LOCA	C	10
Primary to Secondary Leak	D	11
Loss of Power	E	12
Engineered Safety Feature Anomaly	F	13
Loss of Indication	G	14
DELETED	H	14
Secondary Side Anomaly	I	15
Miscellaneous Abnormal Plant Conditions	J	16
Fire and Fire Protection	K	17
DELETED	L	17
Earthquake	M	18
High Winds or Tornado	N	18
Flood, Low Water, or Seiche	O	19
External Events and Chemical Spills	P	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 meteorological</u> " conditions.	GENERAL EMERGENCY
Projected or measured dose rates to be provided by the Radiological Protection Director or Environmental 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 ½ 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, <u>OR</u> b. Charging Area R-4 $\geq 1.0E+4$ mr/hr, <u>OR</u> c. SFP Area R-5 $\geq 1.0E+4$ mr/hr, <u>OR</u> d. Plant area air sample indicates airborne contamination > 1,000 times the occupational DAC values.	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 1,000).	ALERT
(1) <u>Gaseous Releases</u> : See Chart A(2) (2) <u>Liquid Releases</u> : Notification by the Rad-Chem Group of violating ODCM 3.3.1 limits.	Offsite Dose Calculation Manual limits exceeded.	UNUSUAL EVENT

CHART A(2) GASEOUS EFFLUENT ACTION LEVELS

1. AUX BUILDING VENT RELEASES - WITH SIGNIFICANT CORE DAMAGE

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

NOTE: Use adverse meteorology conditions (ADV MET) only when, 10m and 60m wind speed < 5mph AND 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	AUX BLDG SPING MONITORS				AUX BLDG STACK MONITORS				EMERG. CLASS.
	MID RANGE CPM (01-07) PPCS PT G9086G		HIGH RANGE CPM (01-09) PPCS PT G9088G		R-35 MR/HR		R-36 R/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	GENERAL EMERG.
2	8.8E+5	5.5E+3	3.25E+1	*	**	3.9E+2	6.35E+1	4.0E-1	
3	5.9E+5	3.7E+3	2.16E+1	*	**	2.6E+2	4.2E+1	2.6E-1	
4	4.4E+5	2.7E+3	1.62E+1	*	**	2.0E+2	3.175E+1	2.0E-1	

1	8.8E+4	5.5E+2	3.0E+0	*	6.3E+3	3.9E+1	6.3E+0	*	SITE EMERG
2	4.4E+4	2.7E+2	1.5E+0	*	3.1E+3	1.9E+1	3.1E+0	*	
3	2.9E+4	1.8E+2	1.0E+0	*	2.1E+3	1.3E+1	2.1E+0	*	
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	*	*	*	ALERT
2	5.0E+2	3.1E+0	*	*	3.5E+1	*	*	*	
3	3.3E+2	2.0E+0	*	*	2.3E+1	*	*	*	
4	2.5E+2	1.5E+0	*	*	1.75E+1	*	*	*	

1	1.0E+2	6.2E-1	*	*	7.0E+0	*	*	*	UNUSUAL EVENT
2	5.0E+1	3.1E-1	*	*	3.5E+0	*	*	*	
3	3.3E+1	2.0E-1	*	*	2.3E+0	*	*	*	
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 WITHOUT CORE DAMAGE

NOTE: Use adverse meteorology conditions (ADV MET) only when, 10m and 60m wind speed < 5mph AND 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	AUX BLDG SPING MONITORS				EMERG. CLASS.
	MID RANGE CPM (01-07) PPCS PT G9086G		HIGH RANGE CPM (01-09) PPCS PT G9088G		
TOTAL NUMBER RUNNING	AVG MET	ADV MET	AVG MET	ADV MET	
1	**	9.4E+4	1.6E+4	1.0E+2	GENERAL EMERG.
2	**	4.7E+4	8.0E+3	5.0E+1	
3	**	3.1E+4	5.3E+3	3.3E+1	
4	**	2.3E+4	4.0E+3	2.5+1	

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

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

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

** Offscale High (Confirmation Only)

CHART A(2) GASEOUS EFFLUENT ACTION LEVELS continued

3. STEAM LINE RELEASE WITH SIGNIFICANT CORE DAMAGE

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.

R-15 (cpm)	"A" Steam Line Monitors		"B" Steam Line Monitors		Emergency Classification
	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
(1) CET > 1,200 Degrees for greater than 15 minutes, <u>OR</u> (2) R40 or R41 > 1,000 r/hr, <u>OR</u> (3) 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.) (1) <u>Fuel Handling accident in Containment</u> a. Alarm on R-11 <u>OR</u> R-12, <u>AND</u> b. Dropped spent fuel assembly, <u>OR</u> c. 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.	Major damage to spent fuel in containment or auxiliary building.	SITE EMERGENCY
(1) R-9 indication is offscale high, <u>AND</u> (2) Laboratory analysis confirms RCS activity levels comparable to USAR Appendix D, Table D.4-1.	<u>Severe loss of fuel cladding</u> a. Very high coolant activity sample b. Failed fuel monitor indicates greater than 1% fuel failures within 30 minutes or 5% total fuel failures.	ALERT
(1) <u>Fuel Handling Accident in Containment</u> a. A confirming report, <u>AND</u> b. Alarm on R-11 <u>OR</u> R-12, <u>OR</u> (2) <u>Fuel Handling Accident in Auxiliary Bldg.</u> a. A confirming report, <u>AND</u> b. 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 As determined by SP-37-065 (from T.S. 3.1.c)	High reactor coolant activity sample.	UNUSUAL EVENT
(1) R-9 is greater than 5.0 R/hr, <u>AND</u> (2) Verified by RCS chemistry sample analysis.	Failed fuel monitor indicates greater than 0.1% equivalent fuel failures within 30 minutes.	UNUSUAL EVENT

CHART C PRIMARY LEAK TO LOCA

NOTE: 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) <u>LOCA</u> is verified per IPEOP E-1, "Loss of Reactor or Secondary Coolant," <u>AND</u> (2) 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> (3) 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 ≥ 10% hydrogen concentration, <u>OR</u> d. Containment pressure exceeds 46 psig.	(1) Loss of coolant accident, <u>AND</u> (2) Initial or subsequent failure of ECCS, <u>AND</u> (3) Containment failure or potential failure exists (loss of 2 of 3 fission product barriers with a potential loss of 3rd barrier).	GENERAL EMERGENCY
(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, <u>AND</u> (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.	Rapid failure of steam generator tubes with loss of off-site power.	SITE EMERGENCY
(1) Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, <u>AND</u> (2) Primary-to-secondary leak rate > 400 GPM, <u>AND</u> (3) All three transformers: Main Aux., Reserve Aux., and Tertiary Aux., are de-energized.	Rapid gross failure of one steam generator tube with loss of off-site power.	ALERT
(1) Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, <u>AND</u> (2) Primary-to-secondary leak rate greater than 800 GPM indicated by SI flow <u>OR</u> RWST level change.	Rapid failure of multiple steam generator tubes.	ALERT
(1) Primary-to-secondary leakage > 150 gallons per day for more than 4 hours (TS 3.1.d.2). (Do not delay declaration if leakage suddenly increases above 150 gallons per day <u>AND</u> plant shutdown actions are initiated.)	Exceeding Primary-to-Secondary leak rate Technical Specification.	UNUSUAL EVENT

CHART E LOSS OF POWER

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

CHART F ENGINEERED SAFETY FEATURE ANOMALY

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
<p>(1) RCS > 200°F with a loss of cooling capability or inventory control:</p> <ul style="list-style-type: none"> a. Loss of negative reactivity control, <u>OR</u> 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, <u>AND</u> the inability to sustain either natural <u>OR</u> forced circulation with the steam generators ($\leq 350^\circ\text{F}$). <p>(A Site Emergency should be declared upon the initiation of bleed and feed per FR H.1, "Response to Loss of Secondary Heat Sink.")</p>	Complete loss of any function needed when RCS > 200°F.	SITE EMERGENCY
<p>(Apply this criteria when the RCS is $\leq 200^\circ\text{F}$.)</p> <p>(1) Loss of both trains of RHR</p> <p>(Does not apply when core is unloaded <u>OR</u> cavity is flooded with internals removed.)</p>	Complete loss of any function needed when RCS $\leq 200^\circ\text{F}$.	ALERT
<p>(1) Failure of both Rx trip breakers to open upon receipt of a valid signal. Applies even if IPEOP FR S.1 is not entered.</p>	Failure of the Reactor Protection System to initiate and complete a reactor trip which brings the reactor subcritical.	ALERT
<p>(1) Loss of ESF function, required support function or required Tech Spec instruments <u>OR</u> Exceeding Tech Spec Safety Limits, <u>AND</u></p> <p>(2) upon discovery, inability or failure to take required shutdown or mode change actions within the required time.</p> <p>(Total loss of AFW system when required (FR-H.1 implemented) should be declared a UE regardless of Tech Spec action compliance.)</p>	Inability to reach required shutdown within Tech Spec limits	UNUSUAL EVENT

**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> (2) Uncontrolled plant transient in progress or initiated during the loss.	Most or all alarms (annunciators) lost and a plant transient initiated or in progress.	SITE EMERGENCY
(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. (Not applicable when plant is at or below cold shutdown.)	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

**CHART H
(DELETED)**

CHART I SECONDARY SIDE ANOMALY

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
<p>(1) Main steam line break that results in a SI actuation, <u>AND</u></p> <p>(2) a. R-15 or R-19 reads offscale high with confirmation by chemistry analysis, <u>OR</u></p> <p style="padding-left: 20px;">b. Primary-to-secondary leakage > 50 gpm, <u>AND</u></p> <p>(3) a. R-9 or CNTMT high range rad monitors (42599, 42600) indicate > 10 R/hr, <u>OR</u></p> <p style="padding-left: 20px;">b. CNTMT hydrogen monitor indicates > 1% hydrogen concentration.</p>	<p>Steam line break, <u>AND</u></p> <p>Primary-to-secondary leak > 50 GPM, <u>AND</u></p> <p>Indication of Fuel Damage.</p>	<p>SITE EMERGENCY</p>
<p>(1) Main steam line break that results in a SI actuation, <u>AND</u></p> <p style="padding-left: 20px;">a. R-15 <u>OR</u> R-19 reads a factor of 1000 above normal, <u>OR</u></p> <p style="padding-left: 20px;">b. Primary-to-secondary leakage > 10 gpm.</p>	<p>Steam line break with significant (greater than 10 GPM) primary-to-secondary leakage.</p> <p>(Applies even if events occur in opposite steam generators.)</p>	<p>ALERT</p>
<p>(1) Turbine trip and observation of penetration of casing.</p>	<p>Turbine rotating component failure causing rapid plant shutdown.</p>	<p>UNUSUAL EVENT</p>
<p>(1) The uncontrolled depressurization of the secondary system that results in an SI actuation.</p>	<p>Rapid depressurization of the secondary side.</p>	<p>UNUSUAL EVENT</p>

CHART J
MISCELLANEOUS ABNORMAL PLANT CONDITIONS

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
<p>(1) Containment boundary failure or potential failure:</p> <p>a. Containment pressure > 46 psig, <u>OR</u></p> <p>b. Loss of all containment fan coil units and both trains of ICS, <u>OR</u></p> <p>c. Containment hydrogen monitor \geq 10% hydrogen concentration, <u>AND</u></p> <p>(2) Loss of core cooling capability:</p> <p>a. Loss of SI and RHR flow, <u>AND</u></p> <p>(3) Failure of shutdown system when required:</p> <p>a. Entry into IPEOP FR-S.1, "Response to Nuclear Power Generation/ATWS," <u>OR</u></p> <p>b. Loss of AFW for greater than 30 minutes with loss of main FW and condensate.</p>	<p>Other plant conditions that make a release of large amounts of radioactivity in a short time period possible; e.g., any core melt situation.</p> <p>Examples:</p> <ul style="list-style-type: none"> - 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 is imminent. 	<p style="text-align: center;">GENERAL EMERGENCY</p>
<p>(1) Evacuation of Control Room (E-O-06 event).</p>	<p>Evacuation of control room and control of shutdown systems required from local stations.</p>	<p style="text-align: center;">SITE EMERGENCY</p>
<p>(1) 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.</p> <p><u>Example:</u> Loss of AFW system when required, validated upon implementation of FR H.1 "Response to Loss of Secondary Heat Sink."</p>	<p>Other plant conditions that warrant increased awareness on the part of plant staff or state and/or local authorities.</p>	<p style="text-align: center;">UNUSUAL EVENT</p>

**CHART K
FIRE AND FIRE PROTECTION**

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

- NOTE:**
- 1.) Telephone numbers for U of W - Milwaukee Seismic Center are in the KPB Emergency Telephone Directory, ETD 02.
 - 2.) The Point Beach Seismic Monitor may be used if the KNPP Monitor is out of service.

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> (2) Plant above cold shutdown condition.	Sustained winds in excess of design levels with plant not in cold shutdown.	SITE EMERGENCY
(1) A tornado which strikes the facility, <u>AND</u> (2) Causes damage to render a single train of required ESF equipment to be inoperable.	Any tornado striking facility.	ALERT
(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

KNPP INDICATION				EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
FOREBAY LEVEL Indicated for > 15 minutes				Flood, low water, or seiche near design levels.	ALERT
0 PUMPS	1 PUMP	2 PUMPS	CORRESPOND TO LAKE LEVEL		
NOTE 3	NOTE 1	≥ 94% *	≥ 588 ft.		
< 50% *	NOTE 5	NOTE 5	< 568.5 ft.		
OR Deep water Wave ≥ 22.5 ft.					
FOREBAY LEVEL Indicated for > 15 minutes				50-year flood, low water level or seiche	UNUSUAL EVENT
0 PUMPS	1 PUMP	2 PUMPS	CORRESPOND TO LAKE LEVEL		
NOTE 2	≥ 98% *	≥ 88% *	≥ 586 ft.		
< 53.1% *	< 46.9% * NOTE 4	NOTE 5	< 569.5 ft.		
OR Deep water wave ≥ 18 ft. (as confirmed by the U.S. Coast Guard, Two Rivers)					

NOTE 1: Above the bottom of bar No. 1 painted on the south wall of the forebay.

NOTE 2: 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.

NOTE 4: 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.")

NOTE 5: 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> (2) An explosion occurs within a plant building, which causes a complete loss of an ESF function.	Severe damage to safe shutdown equipment from missiles or explosion.	SITE EMERGENCY
(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> (2) Portable monitors indicate toxic or explosive concentrations of the gas at life threatening levels in those vital areas.	Uncontrolled release of toxic or flammable gas is confirmed within vital area.	SITE EMERGENCY
(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> (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.)	Aircraft crash on-site or unusual aircraft activity over facility.	UNUSUAL EVENT
(1) Release of toxic or flammable gas from a ruptured tank/truck on site, <u>AND</u> (2) Portable monitors indicate toxic or explosive concentrations at life threatening levels of the gas near the spill area.	Uncontrolled release of toxic or flammable gas is confirmed on site.	UNUSUAL EVENT

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> (2) Security safeguards contingency event that results in a site specific HI level CREDIBLE threat as defined in the Security Plan.	Ongoing security compromise.	ALERT
(1) Security safeguards contingency event that results in a site specific LO level CREDIBLE threat as defined in the Security Plan, <u>OR</u> (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.	Security threat or attempted entry or attempted sabotage.	UNUSUAL EVENT

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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-AD-03	Rev.	AH		
		Title	KNPP Response to an Unusual Event				
		Date	MAR 18 2003	Page 1 of 24			
Reviewed By		Bill Bartelme		Approved By		Rick Repshas	
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 the Shift Manager/Emergency Director and other initial response personnel for an appropriate response to an **Unusual Event**.

2.0 General Notes

- 2.1 The **Shift Manager (SM)** is the initial **Emergency Director (ED)** in all situations. Any transfer of this responsibility shall be documented in the Shift Manager's log and communicated to all on-site directors.
- 2.2 At the Unusual Event level, radio-pager activation will be performed by Control Room personnel for all designated emergency response directors (primary and alternate).
- 2.3 IF approached by the media during a declared emergency, THEN refer them to the Telephone Response Center (JPIC) at **920-433-1400** or **1-800-838-6192** and tell them that this is their most accurate source for information.

3.0 Precautions and Limitations

- 3.1 Once indication is available that an emergency action level has been exceeded, classification must be made as soon as possible and must not exceed 15 minutes. Once a classification has been declared, notification must be initiated and in progress to the State and County agencies within 15 minutes of event classification using "Event Notice," Form EPIPF-AD-07-01.
- 3.2 The SM should remain in the Control Room during a declared emergency.
- 3.3 The following responsibilities of the ED shall not be delegated.
- 3.3.1 Determination of emergency classification (EPIP-AD-02).
- 3.3.2 Authorization of emergency exposures in excess of 10CFR Part 20 limits (EPIP-AD-11).
- 3.3.3 UNTIL the Emergency Response Manager assumes the responsibility following EOF activation, recommendations of protective actions to off-site authorities (EPIP-AD-19).
- 3.4 The ED should carefully consider the status of activities (especially those identified in Step 3.3 above) before relocating to the TSC. Relocation to the TSC prior to TSC activation is not recommended.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 2 of 24

3.5 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.

4.0 Initial Conditions

4.1 This procedure shall be implemented upon declaration of an **Unusual Event**.

5.0 Procedure

5.1 SM/ED shall take the following Initial Actions:

- 5.1.1 IF a credible security threat (Lo) exists, THEN go to EPIP-AD-20, "KNPP Response to a Security Threat" (Reference Operations Procedure E-0-08).
- 5.1.2 Contact the Shift Technical Advisor (STA) and direct them to report to the Control Room.
- 5.1.3 The SM/ED has the option to require assembly based on the nature of the event and their judgment of threat to plant staff safety.
- 5.1.4 IF assembly could present an unacceptable risk to plant employees as a result of a security event, THEN do NOT initiate assembly. Go to Step 5.1.6 (Reference Operations Procedure E-0-08).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 3 of 24

- 5.1.5 Choose and perform the appropriate plant announcement using plant Gai-tronics.
- a. Prepare your Gai-tronics message by making the choices identified in the appropriate box below.
 - b. IF assembly is NOT required, read aloud two (2) times over the Gai-tronics the message below.

“Attention all personnel. We are experiencing an Unusual Event. Designated emergency response directors should report to their duty locations. No additional response is required at this time.”

Choose (1) or (2)

- (1) No personnel protective actions are required at this time.
- (2) Personnel should avoid the (*plant area*) _____ because of (*type hazard*) _____.

- c. IF assembly is required, THEN:
 - Sound the plant siren.
 - Read aloud two (2) times on the Gai-tronics the message below.

“Attention all personnel. We are experiencing an Unusual Event. Designated emergency response directors should report to their duty locations. All other personnel should report to the nearest assembly area.”

Choose (1) or (2)

- (1) No additional personnel protective actions are required at this time.
- (2) Personnel should avoid the (*plant area*) _____ because of (*type hazard*) _____.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 4 of 24

5.1.6 Contact the Security Shift Captain/Site Protection Director.

- a. IF personnel assembly has been initiated, THEN verify that "Personnel Assembly and Accountability," EPIP-SEC-03, is initiated.
- b. Describe briefly the emergency event.

Note

No protective actions are required for an Unusual Event.

5.1.7 Complete the "Event Notice," Form EPIPF-AD-07-01.

- a. WHEN completing Box 8, get the downwind sector by using Table 1 on the back of the form.
- b. WHEN completing Box 10, check the following item:
 - (A) None

Note

IF there is more than one Notifier and Emergency Response Facility (ERF) Communicator-Control Room (CR), THEN Steps 5.1.8 and 5.1.10 should be done in parallel.

5.1.8 Direct the Notifier or ERF Communicator-CR to initiate notifications per EPIP-AD-07, Attachment A, using the "Event Notice," Form EPIPF-AD-07-01, completed in Step 5.1.7.

5.1.9 IF the event notification is a combination declaration and termination (quick in and out event), THEN determine the need to activate ERO radio pagers.

5.1.10 If appropriate, direct the Notifier or ERF Communicator-CR to activate pagers for Primary Directors and selected support personnel (group codes 9211 and 9222) in accordance with EPIP-AD-07 Step 5.2. (See KPB Emergency Telephone Directory for individual pager numbers).

- a. Obtain a copy of Form EPIPF-AD-07-04, "ERO Event Notification," and provide the following on the form:
 - Pager access code in Step #4
 - Pager message code in Step #5
- b. Give Form EPIPF-AD-07-04 to the Notifier/ERF Communicator-CR and instruct this individual to notify the ERO.

5.1.11 Direct the STA to notify the NRC in accordance with Step 5.5.3 of this procedure.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 5 of 24

5.1.12 Review "State Call-Back - Question Guideline," Form EPIPF-AD-07-02, to prepare for questions which are most likely to be asked by State Duty Officer or State Radiological Coordinator.

5.1.13 Log all significant events and actions.

5.1.14 Update facility directors as needed including such information as:

- Current Emergency Classification
- Conclusions that led to the current classification
- Conditions that may be improving or declining
- Potential changes in status and possible classification changes

5.1.15 UNTIL relieved by a designated ED, continue to make assessments of plant conditions and perform the required actions of the ED (Section 5.2 of this procedure). Go to Step 5.2.7.

5.2 Emergency Director (Designated) shall:

5.2.1 WHEN notified that an Emergency has been declared:

- a. Report to the Control Room.
- b. IF an Emergency Director has been designated, UNTIL released, THEN assist the designated Emergency Director.
- c. IF an Emergency Director has NOT been designated, THEN notify the Shift Manager of your intent to assume the responsibilities of the Emergency Director and continue implementation of this procedure.

5.2.2 WHEN appropriate, accept a briefing from the Shift Manager and STA. Key points listed below:

- a. _____ Classification chart used to determine emergency level.
- b. _____ Protective Action Recommendation in effect.
- c. _____ Status of off-site and KNPP notifications.
- d. _____ Status of plant accountability.
- e. _____ Status of plant operation.
- f. _____ Control Room support priorities.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-03	Rev.	AH
	Title	KNPP Response to an Unusual Event		
	Date	MAR 18 2003	Page 6 of 24	

Note

Verbally inform the Shift Manager that you have accepted the ED responsibilities.

- 5.2.3 Accept formal turnover of responsibilities (for ED) from SM to include:
- Direction and supervision of emergency response operations
 - Approval of changes in emergency classifications
 - Review and approval of all exposures in excess of 10 CFR Part 20 limits
 - PARs (unless transferred to the ERM)
 - Protective actions for plant personnel
 - Continuous accident assessment
- 5.2.4 Notify other directors and Control Room staff of the transfer of the ED responsibility to you and your location.
- 5.2.5 Ensure date and time is entered in the Control Room Chronological Log of Events for turnover of responsibilities for ED from SM.
- 5.2.6 When appropriate:
- a. Relocate to the Technical Support Center (TSC)
 - b. Direct TSC Support Personnel to enter date and time of arrival in TSC chronological log.
- 5.2.7 Ensure the overall emergency level is continually reviewed.
- a. _____ Event Classification (EPIP-AD-02)
 - b. _____ PAR (EPIP-AD-19)
 - c. _____ Emergency radiological exposures (EPIP-AD-11)
- 5.2.8 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.2.7.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 7 of 24

5.2.9 Determine the response status with an information gathering briefing. Include the following emergency response organization directors.

- a. _____ Event Operations Director (EOD):
 - Off-Site Notifications (EPIP-AD-07)
 - Plant Operations Status
 - Control Room support priorities
- b. _____ Radiological Protection Director (RPD):
 - Status of Radiological Effluent Releases (potential off-site dose consequences)
 - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure)
 - Status of Personal Injuries or Vehicle Accidents
- c. _____ Technical Support Center Director (TSCD):
 - Significant Plant Trends
 - Emergency Response Status
- d. _____ Support Activities Director (SAD):
 - Maintenance Activities
 - Search and Rescue (EPIP-OSF-04)
 - Maintenance Support Requirements
- e. _____ Site Protection Director (SPD):
 - Personnel Accountability (EPIP-SEC-03)
 - Significant Security Activities

5.2.10 Determine priorities of major tasks required to minimize the impact on the public and mitigate the incident. Weigh activities in the following areas:

- Operations
- Radiological
- Technical Support
- Maintenance
- Security

5.2.11 Inform Emergency Response Manager (ERM) of plant conditions and priorities.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 8 of 24

- 5.2.12 WHEN appropriate, brief the emergency directors on plant conditions and priorities.
- 5.2.13 IF the ERM has not assumed the responsibility, THEN provide Plant Emergency status updates to off-site authorities.
- a. IF off-site EOCs are activated, THEN use the Dial Select to contact off-site organizations.
 - b. IF off-site organization EOCs are NOT activated, WHEN those organizations initiate a request, provide status updates.
 - c. Use the "State Call-Back - Question Guideline," Form EPIPF-AD-07-02, or "Plant Emergency Status Report," Form EPIPF-EOF-08-05, and/or "Radiological Status Report," Form EPIPF-EOF-08-06, as information guides.
- 5.2.14 Review the need for any Emergency Director Assistants.
- 5.2.15 IF plant conditions indicate the need to activate the full emergency response organization, THEN:
- a. Notify all Directors of your decision to activate the full ERO.
 - b. Direct the Notifier or ERF Communicator-CR to activate pagers for all emergency response personnel (group code 9233) in accordance with EPIP-AD-07 Step 5.2.
 - c. Go to EPIP-AD-04 Step 5.2.4.
- 5.2.16 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.2.17 Review the requirements of Section 5.1 of "Recovery Planning and Termination," EPIP-AD-15, and determine if recovery or termination activities can be implemented in accordance with EPIP-AD-15.
- 5.2.18 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.2.5.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 9 of 24

5.2.19 WHEN Final Conditions (Section 6.0) are met:

- a. Notify the Emergency Response Manager of the event termination or entry into recovery and the suspension of use of the EIPs.
- b. IF the event is an **ENTRY INTO RECOVERY**, THEN read aloud two (2) times on the Gai-tronics the message below.

“Attention all personnel. We have entered plant recovery operations. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as needed. Use of EIPs is suspended when all final actions have been completed to the satisfaction of the facility Director. The Recovery Manager is _____ and the Environmental Liaison is _____.”

- c. IF the event is an emergency class **TERMINATION**, THEN read aloud two (2) times on the Gai-tronics the message below.

“Attention all personnel. We have terminated the Emergency response. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as appropriate. Use of EIPs is suspended when all final actions have been completed to the satisfaction of the facility Director.”

- d. Ensure that termination or recovery notifications have been initiated by the NRC communicator.
- e. Verify that “Event Notice,” Form EIPF-AD-07-01, is being transmitted in accordance with EPIP-AD-07 or EPIP-EOF-08.
- f. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- g. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- h. Implement EPMP-02.01, “Declared Emergency Evaluation and Documentation.”

5.3 The Notifier shall:

- 5.3.1 WHEN notified or upon hearing the Event announcement (except when a Security Event is in progress), report immediately to the SM in the Control Room.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 10 of 24

5.3.2 WHEN directed by the Emergency Director/Shift Manager, perform event notifications. Go to EPIP-AD-07.

5.3.3 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.3.2.

5.3.4 IF an Emergency Response Facility (ERF) Communicator-Control Room (CR) is not available, THEN assume the role of the ERF Communicator-CR and go to Step 5.4.4.

5.3.5 UNTIL released, remain in the Control Room and help the designated ERF Communicator-CR.

5.3.6 WHEN released, report back to the Shift Captain.

5.4 Emergency Response Facility (ERF) Communicator-Control Room (CR) shall:

5.4.1 WHEN directly notified, paged by radio-pager, or hearing the event announcement:

- a. Report to the Control Room immediately.
- b. IF an ERF Communicator-CR has been designated, UNTIL released, THEN assist the ERF Communicator-CR as instructed.
- c. IF an ERF Communicator-CR has NOT been designated, THEN assume the responsibilities of the ERF Communicator-CR and continue to implement this procedure.

5.4.2 Notify the SM/ED of your arrival and assumption of the ERF Communicator-CR duties.

5.4.3 If applicable, obtain the status of notifications and verifications call backs from the Notifier.

5.4.4 IF there is an event •**DECLARATION**, •**TERMINATION**, or •**ENTRY INTO RECOVERY**, and directed by the SM/ED, THEN go to EPIP-AD-07 or EPIP-EOF-08 and make the appropriate event notifications.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 11 of 24

Note

Off-Site and other needed ERO or ERF communications shall be completed before providing support for NRC communications unless there is more than one ERF Communicator-CR available.

- 5.4.5 Contact the Event Operations Director (EOD), ask them to determine if the Technical Support Center, Emergency Operations Facility, and Joint Public Information Center want to assign a person in their facilities to man the 4-way communications link with the Control Room.
- a. IF yes, ask the EOD to remind the other facilities that they can enter the 4-way communications link by using the telephone number and access code provided in the KPB Emergency Telephone Directory ETD-03, "Emergency Response Facilities Telephone List," THEN enter the 4-Way Communication Link.
- b. IF no, THEN make yourself available to support the ED, EOD, or STA.

- 5.4.6 IF requested by the STA, THEN provide communications support with the NRC.

Note

IF there is an event escalation, THEN immediately return support for NRC communications back to the STA or the individual assigned by the SM/ED or EOD unless there is more than one ERF Communicator-CR available.

- 5.4.7 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.4.4.
- 5.4.8 Review the need for the Notifier and assistant communicators support.
- 5.4.9 IF additional communicator support is needed, THEN contact the Technical Support Center Director.
- 5.4.10 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.4.11 Notify the EOD of any significant events.
- 5.4.12 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.4.4.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 12 of 24

5.4.13 WHEN Final Conditions (Section 6.0) are met:

- a. Ensure that termination or recovery communications have been completed in accordance with Step 5.4.6.
- b. Verify that the bell switch on the emergency government verification line is in the ON position.
- c. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper places.
- d. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

5.5 Shift Technical Advisor shall:

Note

The Shift Technical Advisor shall be capable of responding to the Control Room within 10 minutes.

5.5.1 Report to the Control Room to be briefed on plant conditions.

5.5.2 Assist the Shift Manager in assessing plant conditions and determining emergency classification as defined in EPIP-AD-02, "Emergency Class Determination."

Note

IF all off-site and ERO notifications are complete, THEN NRC notifications may be delegated to an extra ERF Communicator-CR.

5.5.3 Perform NRC Notification:

- a. Gather information needed to prepare the NRC "Event Notification Worksheet," Form GNP-11.04.04-1.

Note

If needed, the commercial telephone number is (301) 951-0550.

- b. Notify the NRC (Headquarters, Rockville) as soon as possible, but not more than one hour after declaration of the Event, using the Emergency Notification System (ENS) phone.

Note

The NRC may request continuous communications per 10CFR50.72(c)(3). The STA must coordinate this activity with accident assessment until arrival of sufficient ERF Communicator-CR.

- c. Provide the NRC with the necessary information from a completed Event Notification Worksheet.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 13 of 24

5.5.4 WHEN the ERF Communicator-CR (ERFCM-CR) arrives and plant status and other activities are at a point that it is appropriate, turn NRC communications over to the ERFCM-CR by taking the following actions:

- a. Brief the ERFCM-CR on plant conditions, the status of NRC notification and updates.
- b. Inform the ERFCM-CR that you are turning over responsibility for NRC communications to them.

5.5.5 Support the Control Room staff with technical and analytical assistance in diagnosing abnormal events and to ensure adequate core cooling.

5.5.6 Monitor plant conditions and provide assistance as needed to the Shift Manager.

5.5.7 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.6.5.

5.5.8 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.5.5.

5.5.9 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

5.6 Event Operations Director (EOD) shall:

5.6.1 WHEN notified that an Emergency has been declared:

- a. Report to the Control Room.
- b. IF an Event Operations Director has been designated, UNTIL released, THEN assist the designated Event Operations Director.
- c. IF an Event Operations Director has NOT been designated, THEN notify the Shift Manager of your intent to assume the responsibilities of the Event Operations Director and continue implementation of this procedure.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 14 of 24

Note

Verbally inform the Shift Manager that you have accepted the EOD responsibilities.

- 5.6.2 Accept formal turnover of responsibilities (for EOD) from SM to include:
- TSC and EOF communications
 - Maintaining verification of accountability
 - Staffing of Control Room
 - Processing work requests
 - Monitoring fire fighting operations and maintaining accountability of fire team
 - Obtaining additional assistance from Emergency Response Organization
 - Monitoring and support of plant operations
- 5.6.3 Notify the SM/ED of your arrival and assumption of Event Operations Director responsibilities.
- 5.6.4 Ensure date and time is entered in the Control Room Chronological Log of Events for turnover of responsibilities for EOD from SM.
- 5.6.5 WHEN appropriate, accept a briefing from the Shift Manager and STA.
- 5.6.6 If required, verify Control Room personnel accountability is being maintained.
- 5.6.7 Review Control Room staffing requirements and:
- a. Contact additional operations personnel as needed and request that they report to the site (See KPB Emergency Telephone Directory for names and numbers).
 - b. Release any personnel not required.
- 5.6.8 Assess overall plant status.
- Verify equipment status and instrument indications.
 - Verify Radiation monitors for abnormal indications.
 - Review corrective actions that have been taken.
- 5.6.9 Make any recommendations to the Shift Manager as necessary.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 15 of 24

- 5.6.10 Brief the Emergency Director of any changes on:
- Off-Site Notifications (EPIP-AD-07)
 - Plant Operations Status
 - Control Room support priorities
- 5.6.11 Inform the RPD of any changes in radiological indications.
- 5.6.12 If required, request technical or maintenance support from the ED.
- 5.6.13 Prepare all work requests (WR) for approval.
- a. Review WR and designate retest requirements.
 - b. If required to do the job, determine and initiate system lineups and tagouts.
- 5.6.14 Brief the Control Room staff periodically on:
- Emergency response status
 - Priorities
 - Specific guidance and assignments
- 5.6.15 If appropriate, plan for shift relief per EPIP-AD-05.
- 5.6.16 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.7.5.
- 5.6.17 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.6.4.
- 5.6.18 WHEN Final Conditions (Section 6.0) are met:
- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
 - b. Collect all completed records and logs from all documents generated during the course of the event.
 - c. Schedule a self critique with all CR event participants (all shifts) as soon as practical.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 16 of 24

5.7 Radiological Protection Director (RPD) shall:

5.7.1 WHEN notified that an Emergency has been declared:

- a. Report to the Radiation Protection Office (RPO).
- b. IF a Radiation Protection Director has been designated, UNTIL released, THEN assist the designated RPD.
- c. IF a Radiation Protection Director has NOT been designated, THEN assume the responsibilities of the RPD and continue implementing this procedure.

5.7.2 Notify the ED/TSCD of your arrival in the RPO and assumption of RPD responsibilities.

5.7.3 If required, verify personnel accountability in RPO is being maintained.

5.7.4 If required, assist the SAD in search and rescue operations (EPIP-OSF-04).

5.7.5 Check radiological and meteorological information available in the TSC.

5.7.6 If needed, request additional Area and Process radiation monitor information from the Event Operations Director.

5.7.7 Verify that emergency radiation controls are being implemented (EPIP-AD-11).

5.7.8 If required, assist the SPD with Personnel Evacuation, (EPIP-SEC-05).

Note

Transportation of a contaminated injured person shall be to the Aurora Medical Center and a Radiation Technologist should be dispatched to the hospital.

Note

IF there is a question as to the extent of injuries, THEN it should be treated as a critical injury.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 17 of 24

Note

Off-Site Support Agencies and their phone numbers are listed in the KPB Emergency Telephone Directory, ETD 02, "Off-Site Agency Call List".

5.7.9 **IF** there are injuries or vehicle accidents associated with plant personnel or contractors, **THEN** contact the appropriate support.

- a. **IF** the injury is a "Medical Attention (Critical) Injury," see NAD-02.09 for definition of critical injuries, a vehicle accident with injuries, **THEN**:
1. Contact the County Sheriffs office with jurisdiction at the location of the injury(s). (Kewaunee County has jurisdiction on the KNPP site.)
 - Kewaunee County Dispatch - 911
 - Manitowoc County Dispatch - 920-683-4200
 2. Notify the dispatcher of the accident and/or injury and request a rescue squad (all critically injured personnel shall be transported by rescue squad).
 3. Provide the dispatcher with the following information:
 - Your name, position, and return telephone number.
 - The location of the accident and when it occurred.
 - How many and how the injury(s) occurred.
 - Nature and extent of injuries and condition of the patient(s).
 - If any, extent of radioactive contamination and instructions that transportation of a potentially contaminated injured person shall be to the Aurora Medical Center.
 - Plant name, location.
 - If required, plant access instructions.
 4. If the injury is on-site:
 - Inform the SPD of your request for a rescue squad and its estimated time of arrival.
 - Direct the SPD to have the vehicle driven to the proper plant entrance.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 18 of 24

5. IF the accident potentially involves radioactive contamination, THEN:
 - Dispatch a Radiation technologist to the accident site for contamination control.
 - Dispatch a Radiation Technologist to the Aurora Medical Center to assist the hospital staff.
 6. Insure that the requirements for "Injury/Illness Response," NAD-02.09, are implemented.
 7. Inform the Emergency Director, Emergency Response Manager, and the Plant Spokesperson of the accident and details of the injuries.
- b. IF the Injury is a "Medical Attention (Non-critical) Injury," THEN:

Note

Any KNPP or contractor vehicle may be used for transport of (non-critical) injured personnel.

1. Arrange for transportation of the injured person.
2. Direct the SPD to have the vehicle driven to the proper plant entrance.
3. Contact the hospital or clinic and provide the following information:
 - Your name, position, and return telephone number.
 - When, how many, and how the injury(s) occurred.
 - Nature of injuries and condition of the patient.
 - If any, extent of radioactive contamination.
 - Plant name, location, and access instructions.
 - Estimated time of arrival for the patient(s) at the hospital or clinic.
4. IF there are contaminated injuries, THEN send a Radiation Technologist to the Aurora Medical Center to assist the hospital staff.
5. Insure that the requirements for "Injury/Illness Response," NAD-02.09, are implemented.
6. Inform the Emergency Director, Emergency Response Manager, and the Plant Spokesperson of the accident and details of the injuries.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-03	Rev.	AH
	Title	KNPP Response to an Unusual Event		
	Date	MAR 18 2003	Page 19 of 24	

- 5.7.10 Brief the Emergency Director of plant radiological conditions.
- Status of Radiological Effluent Releases (potential off-site dose consequences).
 - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure).
 - Status of Personal Injuries or Vehicle Accidents.
- 5.7.11 Review the personnel requirements in the RPO/RAF and:
- a. As needed, contact Radiation Technologists to augment the on-shift personnel.
 - b. Release any RPO staff not required.
- 5.7.12 If appropriate, coordinate with the ALD to establish contract support for long term accident support.
- 5.7.13 If appropriate, relocate to the TSC.
- 5.7.14 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.7.15 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.8.5.
- 5.7.16 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.7.3.
- 5.7.17 WHEN Final Conditions (Section 6.0) are met:
- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to there proper place.
 - b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
 - c. Verify all samples collected have been cataloged and appropriately stored.
 - d. Schedule a self critique with all event participants in the RPO/RAF (all shifts) as soon as practical.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 20 of 24

5.8 Technical Support Center Director (TSCD) shall:

5.8.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Technical Support Center Director has been designated, UNTIL released, THEN assist the designated TSCD.
- c. IF a Technical Support Center Director has NOT been designated, THEN assume the responsibilities of the TSCD and continue implementing this procedure.

5.8.2 Notify the Emergency Director of your assumption of TSCD responsibilities.

5.8.3 Contact the Emergency Director and obtain information on plant status.

5.8.4 If required, verify accountability is being maintained in the TSC (EPIP-SEC-03).

5.8.5 Brief the Emergency Director on TSC activities:

- Significant Plant Trends
- Emergency Response Status

5.8.6 Ensure the TSC staff is informed of plant status and ED priorities.

5.8.7 Review TSC staffing requirements.

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

5.8.9 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.9.5.

5.8.10 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.8.4.

5.8.11 WHEN Final Conditions (Section 6.0) are met:

- a. Ensure TSC and OSF are deactivated per "Technical Support Center Activation," EPIP-TSC-02.
- b. Collect all records and logs from all documents generated during the course of the event.
- c. Schedule a self critique with all event participants in the TSC (all shifts) as soon as practical.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 21 of 24

5.9 Support Activities Director (SAD) shall:

5.9.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Support Activities Director has been designated, UNTIL released, THEN assist the designated SAD.
- c. IF a Support Activities Director has NOT been designated, THEN assume the responsibilities of the SAD and continue implementing this procedure.

5.9.2 Notify the Emergency Director of your assumption of SAD responsibilities and obtain information on plant status and immediate actions.

5.9.3 If needed, direct search and rescue operations (EPIP-OSF-04).

5.9.4 Direct emergency maintenance activities in accordance with the priorities established by the Emergency Director.

5.9.5 Review the maintenance staffing requirements to mitigate the incident.

5.9.6 Brief the Emergency Director on OSF activities:

- Maintenance Activities
- Search and Rescue (EPIP-OSF-04)
- Maintenance Support Requirements

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

5.9.8 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.10.6.

5.9.9 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.9.3.

5.9.10 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in the OSF (all shifts) as soon as practical.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 22 of 24

5.10 Site Protection Director (SPD) shall:

5.10.1 WHEN notified that an Emergency has been declared:

- a. Report to the Security Building.
- b. IF a Site Protection Director has been designated, UNTIL released, THEN assist the designated SPD.
- c. IF a Site Protection Director has NOT been designated, THEN assume the responsibilities of the SPD and continue implementing this procedure.

5.10.2 Notify the ED/TSCD of your arrival in the Security Building and assumption of the SPD responsibility.

5.10.3 Direct the implementation "Security Force Response to Emergencies," EPIP-SEC-02.

5.10.4 If required, establish "Personnel Assembly and Accountability," EPIP-SEC-03.

5.10.5 IF Search and Rescue is required due to accountability results, THEN notify the Support Activities Director.

5.10.6 If appropriate, relocate to the TSC.

5.10.7 Obtain information from the RPD or the Control Room concerning fire, chemical, or radiological hazards present within the protected area.

5.10.8 IF hazards identified by the RPD or the Control Room warrant it, THEN restrict personnel movement.

5.10.9 IF directed by the ED, THEN initiate a plant evacuation (EPIP-SEC-05).

5.10.10 Brief the Emergency Director on security activities:

- Removal of visitors from site (i.e., fishermen) (EPIP-SEC-02)
- Personnel Accountability (EPIP-SEC-03)
- Access Control
- Significant Security Activities

5.10.11 Ensure that the Security Force and staff are informed of any significant issues relative to their activities.

5.10.12 If required, ensure accountability is maintained (EPIP-SEC-03).

5.10.13 Review security staffing requirements and make appropriate adjustments.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-03	Rev.	AH
	Title	KNPP Response to an Unusual Event		
	Date	MAR 18 2003	Page 23 of 24	

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

5.10.15 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and go to EPIP-AD-04 Step 5.11.7.

5.10.16 IF Final Conditions (Section 6.0) are NOT met, THEN go to Step 5.10.7.

5.10.17 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in Security (all shifts) as soon as practical.

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 EIPs.

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 COMTRAK 87-152, Downgrading of EALs
- 7.3 COMTRAK 88-068, Calling in Additional Communicators as Required
- 7.4 NRC Inspection Report K-87-195, same as Step 7.2
- 7.5 10CFR50.72(c)(3), Maintaining Open Communications with the NRC
- 7.6 NAD-02.09, Injury/Illness Response
- 7.7 EPIP-AD-02, Emergency Class Determination
- 7.8 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.9 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.10 EPIP-AD-07, Initial Emergency Notifications
- 7.11 EPIP-AD-11, Emergency Radiation Controls

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-03	Rev. AH
	Title KNPP Response to an Unusual Event	
	Date MAR 18 2003	Page 24 of 24

- 7.12 EPIP-AD-15, Recovery Planning and Termination
- 7.13 EPIP-AD-19, Protective Action Guidelines
- 7.14 EPIP-AD-20, KNPP Response to a Security Threat
- 7.15 EPIP-EOF-08, Continuing Emergency Notifications
- 7.16 EPIP-OSF-04, Search and Rescue
- 7.17 EPIP-SEC-02, Security Force Response to Emergencies
- 7.18 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.19 EPIP-SEC-05, Personnel Evacuation
- 7.20 EPIP-TSC-02, Technical Support Center Activation
- 7.21 KPB Emergency Telephone Directory
- 7.22 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.23 Form GNP-11.04.04-1, Event Notification Worksheet
- 7.24 Form EPIPF-AD-07-01, Event Notice
- 7.25 Form EPIPF-AD-07-02, State Call-Back - Question Guideline
- 7.26 Form EPIPF-AD-07-03, Fax Event Notice
- 7.27 Form EPIPF-AD-07-04, ERO Event Notification

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

- Event Notice, Form EPIPF-AD-07-01
- Event Notification Worksheet, Form GNP-11.04.04-1

8.1.2 Non-QA Records

None

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM			
	Title KNPP Response to Alert or Higher				
	Date MAR 18 2003	Page 1 of 32			
Reviewed By Bill Bartelme		Approved By Rick Repshas			
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 the Shift Manager/Emergency Director and other initial response personnel for an appropriate response to an **Alert, Site Emergency, or General Emergency**.

2.0 General Notes

- 2.1 The Shift Manager (SM) is the initial Emergency Director (ED) in all situations. Any transfer of this responsibility shall be documented in the Shift Manager's log and communicated to all on-site directors.
- 2.2 As more information becomes available, initial protective action recommendations should be adjusted in accordance with plant conditions, dose projections, time available to evacuate, estimated evacuation times, and meteorological conditions (EPIP-AD-19, "Protective Action Guidelines").
- 2.3 IF approached by the media during a declared emergency, THEN refer them to the Telephone Response Center at (920) 433-1400 or 1-800-838-6192 and tell them that this is their most accurate source for information.

3.0 Precautions and Limitations

- 3.1 Once indication is available that an emergency action level has been exceeded, classification must be made as soon as possible and must not exceed 15 minutes. Once a classification has been declared, notification must be initiated and in progress to the State and County agencies within 15 minutes of event classification using "Event Notice," Form EPIPF-AD-07-01.
- 3.2 The SM should remain in the Control Room during a declared emergency.
- 3.3 The following responsibilities of the ED shall NOT be delegated:
- 3.3.1 Determination of emergency classification (EPIP-AD-02, "Emergency Class Determination").
- 3.3.2 Authorization of emergency exposures in excess of 10CFR Part 20 limits (EPIP-AD-11, "Emergency Radiation Controls").
- 3.3.3 UNTIL the Emergency Response Manager assumes the responsibility following EOF activation, recommendations of protective actions to off-site authorities (EPIP-AD-19).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 2 of 32	

3.4 The ED should carefully consider the status of activities (especially those identified in Step 3.3 above) before relocating to the TSC. Relocation to the TSC prior to TSC activation is not recommended.

3.5 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.

4.0 Initial Conditions

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

5.0 Procedure

5.1 SM/ED shall take the following Initial Actions:

5.1.1 IF a security threat exists, THEN go to EPIP-AD-20, "KNPP Response to a Security Threat" (Reference Operations Procedure E-0-08).

5.1.2 Contact the Shift Technical Advisor (STA) and direct them to report to the Control Room.

5.1.3 IF the event can be declared and terminated within one notification, THEN the SM/ED has the option to require assembly based on the nature of the event and their judgment of threat to plant staff safety. In case assembly is not warranted, go to Step 5.1.6.c.

5.1.4 IF assembly could present an unacceptable risk to plant employees as a result of a security event, THEN do NOT initiate assembly. Go to Step 5.1.6 (Reference Operations Procedure E-0-08).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 3 of 32

5.1.5 Initiate personnel assembly.

- a. Prepare your Gai-tronics message by making the choices identified in the box below in Step 5.1.5.c.
- b. Sound the plant siren.
- c. Read aloud two times on the Gai-tronics the message below.

“Attention all personnel. We are experiencing an (*Choose One*) (*Alert/Site Emergency/General Emergency*). Emergency response organization personnel should report to their duty locations. All other personnel should report to the nearest assembly area.”

Choose (1) or (2)

(1) No additional personnel protective actions are required at this time.

(2) Personnel should avoid the (*plant area*) _____ because of (*type hazard*) _____.

5.1.6 Contact the Security Shift Captain/Site Protection Director.

- a. Verify “Security Force Response to Emergencies,” EPIP-SEC-02, actions are being implemented for an Alert or Higher.
 - Verify on-site members of the general public are directed to leave the site in accordance with EPIP-SEC-02.
 - Verify control measures for site access/egress are established in accordance with EPIP-SEC-02.
- b. IF personnel assembly has been initiated, THEN verify that “Personnel Assembly and Accountability,” EPIP-SEC-03, is initiated.
- c. Describe briefly the emergency event.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 4 of 32

Note

Protective actions for the public are required for a General Emergency only.

5.1.7 Complete the “Event Notice,” Form EPIPF-AD-07-01.

Note

Adverse meteorology exists if:

1. The 10 AND 60 meter wind speed is less than 5 mph, AND
 2. Delta T is greater than +2.4°F OR Sigma Theta is less than 3.01 degrees.
(Refer to Graphic Display #52 from the PPCS terminal).
- a. IF adverse meteorology does NOT exist, THEN complete Box 8 by getting the downwind sector(s) from Table 1 on the back of Form EPIPF-AD-07-01.
 - b. IF adverse meteorology does exist, THEN enter N/A in Box 8 and explain in Box 11.
 - c. IF the event is a General Emergency and adverse meteorology does NOT exist, WHEN completing Box 10, THEN enter the following items:
 - (B) Evacuate ALL sectors out to 2 miles, AND

Note

To determine sectors in (B), include the downwind sector(s) from Table 1 on back of Form EPIPF-AD-07-01.

- (B) Evacuate downwind sectors _____ out to 5 miles.
- d. IF the event is a General Emergency and adverse meteorology exists, WHEN completing Box 10, THEN enter the following item:
 - (B) Evacuate ALL sectors out to 5 miles.
 - e. IF the event is an Alert or Site Emergency, WHEN completing Box 10, THEN check the following item:
 - (A) None

Note

IF there is more than one Notifier and Emergency Response Facility (ERF) Communicator-Control Room (CR), THEN Steps 5.1.8 and 5.1.10 should be done in parallel.

5.1.8 Direct the Notifier or ERF Communicator-CR to initiate notifications per Attachment A of EPIP-AD-07, “Initial Emergency Notifications,” using the “Event Notice,” Form EPIPF-AD-07-01, completed in Step 5.1.7.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 5 of 32

- 5.1.9 IF the event notification is a combination declaration and termination (quick in and out event), THEN determine the need to activate ERO radio pagers.
- 5.1.10 Direct the Notifier or ERF Communicator-CR to activate pagers for all emergency response personnel (group code 9233) in accordance with EPIP-AD-07 Step 5.2. (See KPB Emergency Telephone Directory for individual pager numbers.)
- a. Obtain a copy of Form EPIPF-AD-07-04, "ERO Event Notification," and provide the following on the form:
- Pager access code in Step #4
 - Pager message code in Step #5
- b. Give Form EPIPF-AD-07-04 to the Notifier/ERF Communicator-CR and instruct this individual to notify the ERO.
- 5.1.11 Direct the STA to notify the NRC in accordance with Step 5.6.3 of this procedure.
- 5.1.12 Review "State Call-Back - Question Guideline," Form EPIPF-AD-07-02, to prepare for questions which are most likely to be asked by State Duty Officer or State Radiological Coordinator.
- 5.1.13 Log all significant events and actions.
- 5.1.14 Verify Control Room Ventilation System operation.
- 5.1.15 Report any increase in Control Room radiation to the Radiological Protection Director (RPD) for habitability assessment.
- 5.1.16 Request support from Technical Support Center (TSC) or OSF staff as needed.
- 5.1.17 Update facility directors as needed including such information as:
- Current Emergency Classification
 - Conclusions that led to the current classification
 - Conditions that may be improving or declining
 - Potential changes in status and possible classification changes
- 5.1.18 Until relieved by a designated ED, continue to make assessments of plant conditions and perform the required actions of the ED (Section 5.2 of this procedure) go to Step 5.2.9.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 6 of 32	

5.2 **Emergency Director (Designated)** shall:

5.2.1 WHEN notified that an Emergency has been declared:

- a. Report to the Control Room.
- b. IF an Emergency Director has been designated, THEN until released,
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated Emergency Director.
- c. IF an Emergency Director has NOT been designated, THEN notify the Shift Manager of your intent to assume the responsibilities of the Emergency Director and continue implementation of this procedure.

5.2.2 When appropriate, accept a briefing from the Shift Manager and STA. Key points listed below:

- a. _____ Classification chart used to determine emergency level.
- b. _____ Protective Action Recommendation in effect.
- c. _____ Status of off-site and KNPP notifications.
- d. _____ Status of plant accountability.
- e. _____ Status of plant operation.
- f. _____ Control Room support priorities.

Note

Verbally inform the Shift Manager that you have accepted the ED responsibilities.

5.2.3 Accept formal turnover of responsibilities (for ED) from SM to include:

- Direction and supervision of emergency response operations
- Approval of changes in emergency classifications
- Review and approval of all exposures in excess of 10 CFR Part 20 limits
- PARs (unless transferred to the ERM)
- Protective actions for plant personnel
- Continuous accident assessment

5.2.4 Notify other directors and Control Room staff of the transfer of the ED responsibility to you and your location.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 7 of 32	

- 5.2.5 Ensure date and time is entered in the Control Room Chronological Log of Events for turnover of responsibilities for ED from SM.
- 5.2.6 When appropriate:
- Relocate to the Technical Support Center (TSC)
 - Direct TSC Support Personnel to enter date and time of arrival in TSC chronological log.
- 5.2.7 If appropriate, direct the Offsite Communicator in the TSC to take responsibility for off-site notifications from the Control Room.
- 5.2.8 Brief the TSC staff on the plant conditions.
- 5.2.9 Ensure the overall emergency level is continually reviewed.
- _____ Event Classification (EPIP-AD-02)
 - _____ PAR (EPIP-AD-19)
 - _____ Emergency Radiological Exposures (EPIP-AD-11)

Warning

It is NOT required to de-escalate from an Emergency Action Level. Termination or direct entry into recovery is preferable. However, there may be occasions when it is more appropriate to de-escalate.

EPIP-AD-02 and other EIPs are NOT written to facilitate de-escalation. Therefore, any decision to de-escalate instead of entering recovery must be based on a thorough review of EPIP-AD-02 and careful use of appropriate procedures.

- 5.2.10 IF plant conditions have met the conditions for escalating or de-escalating the emergency classification (EPIP-AD-02), document the time and emergency level being declared, THEN:
- IF assembly could present an unacceptable risk to plant employees as a result of a Security Event, THEN do NOT initiate assembly. Go to Step 5.2.10(d).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 8 of 32

- b. IF accountability has NOT already been completed, THEN:
1. Direct a Control Room staff member to sound the plant siren.
 2. WHEN the plant siren has been sounded, read aloud two times on the Gai-tronics the message below:

“Attention all personnel. We have (Choose One) escalated/de-escalated from (Choose One) (Unusual Event/Alert/Site Emergency/General Emergency) to (Choose One) ((Unusual Event/Alert/Site Emergency/General Emergency). Designated emergency response directors should take appropriate action.

Emergency Personnel shall report to their emergency duty station. All other personnel should report to the nearest assembly area.”

Choose (1) or (2)

- (1) No additional personnel protective actions are required at this time.
- (2) Personnel should avoid the (plant area) _____ because of (type hazard) _____.

- c. IF personnel assembly has been completed, THEN:
1. Direct a Control Room staff member to sound the plant siren.
 2. When the plant siren has been sounded, read aloud two (2) times on the Gai-tronics the message below:

“Attention all personnel. We have (Choose One) escalated/de-escalated from (Choose One) (Unusual Event/Alert/Site Emergency/General Emergency) to (Choose One) (Unusual Event/Alert/Site Emergency/General Emergency). Designated emergency response directors should take appropriate action.”

Choose (1) or (2)

- (1) No additional personnel protective actions are required at this time.
- (2) Personnel should avoid the (plant area) _____ because of (type hazard) _____.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 9 of 32

- d. IF the EOF has NOT accepted responsibility for off-site notifications and PARs, THEN:

Note

Protective actions for the public are required for a General Emergency only.

1. Review current and potential protective action recommendations (EPIP-AD-19).
2. IF time permits, THEN contact off-site authorities via the Dial-Select to discuss pending changes in classification and/or appropriate PAR.
3. Initiate revised event classifications and/or PAR on "Event Notice," Form EPIPF-AD-07-01.
4. Review and sign all "Event Notice," Form EPIPF-AD-07-01, that are generated from the CR/TSC.
5. Forward approved "Event Notice," Form EPIPF-AD-07-01, to the Offsite Communicator for transmission to off-site agencies.
6. For initial or change in classification, direct the Offsite Communicator to activate pagers for all emergency response personnel (group code 9233) in accordance with EPIP-AD-07 Step 5.2. (See KPB Emergency Telephone Directory for individual pager numbers.)
 1. Obtain a copy of Form EPIPF-AD-07-04, "ERO Event Notification," and provide the following on the form:
 - Pager access code in Step #4
 - Pager message code in Step #5
 2. Give Form EPIPF-AD-07-04 to the Offsite Communicator and instruct this individual to notify the ERO.
 7. Verify that required notifications are made (EPIP-AD-07 or EPIP-EOF-08, "Continuing Emergency Notifications").
- e. IF the EOF has taken responsibility for off-site notifications and PARs, THEN ensure the ERM is notified of the emergency level escalation and the time it was declared.
- f. Direct the Shift Technical Advisor to notify the NRC in accordance with Step 5.6.3 of this procedure.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 10 of 32

5.2.11 Determine the response status with an information collection brief. Include the following emergency response organization Directors:

- a. _____ Event Operations Director (EOD):
 - Off-site Notifications (EPIP-AD-07)
 - Plant Operations Status
 - Control Room support priorities
- b. _____ Radiological Protection Director (RPD):
 - Status of Radiological Effluent Releases (potential off-site dose consequences)
 - Off-site Dose Assessment Evaluation
 - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure)
 - Status of Personal Injuries or Vehicle Accidents
 - Availability of Potassium Iodide (EPIP-AD-18, "Potassium Iodide Distribution")
 - Status of plant conditions that could warrant evacuation of non-essential plant personnel
- c. _____ Technical Support Center Director (TSCD):
 - TSC Activation and Operational Status (EPIP-TSC-02, Technical Support Center Activation")
 - Significant Plant Trends
 - "Core Damage Assessment" (EPIP-TSC-09A, "Core Damage Assessment")
- d. _____ Support Activities Director (SAD):
 - OSF Activation and operational status
 - OSF Facility Operations (EPIP-OSF-02, "Operational Support Facility Operations")
 - Maintenance Activities
 - "Search and Rescue" (EPIP-OSF-04, "Search and Rescue")

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 11 of 32	

e. _____ Site Protection Director (SPD):

- Removal of Visitors from site (i.e., fishermen) (EPIP-SEC-02)
- Personnel Accountability (EPIP-SEC-03)
- Access Control
- Significant Security Activities

f. _____ Severe Accident Management Team Leader (SAMTL):

- SAM Team Status
- Severe Challenge Status
- Strategies Implemented
- Strategies being Evaluated
- New Strategy Recommendations

5.2.12 Determine priorities of major tasks required to minimize the impact on the public and mitigate the incident. Weigh activities in the following areas:

- Operations
- Radiological
- Technical Support
- Maintenance
- Security

5.2.13 Inform Emergency Response Manager (ERM) of:

- Status of the plant.
- On-site or off-site radiological releases or potential releases.
- Priorities of tasks to minimize the impact to the public.
- Incidents of public interest (i.e., fires, spills, personnel contaminations, and personnel injuries).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page	12 of 32

5.2.14 When appropriate, brief the Plant Emergency Response Organization on plant conditions and priorities. Give specific guidance and assignments considering the following:

- a. If required, direct evacuation of non-essential personnel from the plant.
 - Direct the SPD to initiate a plant evacuation.
 - Direct the RPD to assist the SPD in the plant evacuation.
 - Contact the Manitowoc and Kewaunee County Emergency Directors and the ERM to coordinate the evacuation (may use Dial Select).
 - The SPD implements and coordinates instructions.
 - Update the Manitowoc and Kewaunee County Emergency Directors and the ERM on the status of the evacuation (may use Dial Select).
- b. If appropriate, instruct the data coordinator to initiate plant parameter trends on the following:
 - Safety Assessment System
 - Digital Display (#3)
 - PPCS Trend Recorders

5.2.15 IF the ERM has NOT assumed the responsibility, THEN provide Plant Emergency status updates to off-site authorities.

- a. IF off-site EOCs are activated, THEN use the Dial Select to contact off-site organizations.
- b. IF off-site organization EOCs are NOT activated, WHEN those organizations initiate a request, THEN provide status updates.
- c. Use the "State Call-Back - Question Guideline," Form EPIPF-AD-07-02, or "Plant Emergency Status Report," Form EPIPF-EOF-08-05, and/or "Radiological Status Report," Form EPIPF-EOF-08-06, as information guides.

5.2.16 Review the plant Emergency Response Staffing requirements and need for any Emergency Director Assistants.

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

5.2.18 Review the requirements of Section 5.1 of EPIP-AD-15, "Recovery Planning and Termination," and determine if recovery or termination activities can be implemented.

5.2.19 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.2.7.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 13 of 32

5.2.20 WHEN Final Conditions (Section 6.0) are met:

- a. Notify the Emergency Response Manager of the event termination or entry into recovery and the suspension of the use of the use of EPIPs.
- b. IF the event is an ENTRY INTO RECOVERY, THEN read aloud two times on the Gai-tronics the message below:

“Attention all personnel. We have entered plant recovery operations. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as appropriate. Use of EPIPs is suspended when all final actions have been completed to the satisfaction of the facility Director. The Recovery Manager is _____ and the Environmental Liaison is _____.”

- c. IF the event is an emergency class TERMINATION, THEN read aloud two times on the Gai-tronics the message below:

“Attention all personnel. We have terminated the Emergency response. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as appropriate.”

- d. Ensure that termination or recovery notifications have been initiated by the NRC communicator.
- e. Verify that “Event Notice,” Form EPIPF-AD-07-01, is being transmitted accordance with EPIP-AD-07 or EPIP-EOF-08.
- f. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to there proper place.
- g. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- h. Implement EPMP-02.01, “Declared Emergency Evaluation and Documentation.”

5.3 The Notifier shall:

- 5.3.1 WHEN notified or upon hearing the Event announcement (except when a Security Event is in progress), report immediately to the SM in the Control Room.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 14 of 32	

5.3.2 WHEN directed by the Emergency Director/Shift Manager to perform event notifications, go to EPIP-AD-07.

5.3.3 IF an Emergency Response Facility (ERF) Communicator-Control Room (CR) is NOT available, THEN assume the role of the ERF Communicator-CR and go to Step 5.4.4.

5.3.4 When notified by the Offsite Communicator in the EOF or TSC that they are prepared to accept offsite communications:

- a. Receive confirmation from the ED or EOD that it is appropriate to transfer communications.
- b. Inform the Offsite Communicator that he has responsibility for offsite notifications.
- c. Ensure date, time, and location is entered in the Control Room Chronological Log of Events for turnover of responsibilities to the Offsite Communicator from the Notifier.
- d. Inform the ED or EOD that offsite communications have been transferred to the Offsite Communicator, and that the log entry for this transfer has been made.
- e. Ensure the bell is turned off on the Government Verification line.

5.3.5 Until released, remain in the Control Room and help the designated ERF Communicator-CR.

5.3.6 WHEN released, report back to the Shift Captain.

5.4 **Emergency Response Facility (ERF) Communicator shall:**

5.4.1 WHEN directly notified, paged by radio-pager, or hearing the event announcement:

- a. Report to the Control Room immediately.
- b. IF the ERF Communicator-CR has been designated, THEN until released, assist the designated ERF Communicator-CR.
- c. IF an ERF Communicator-CR has NOT been designated, THEN assume the responsibilities of the ERF Communicator-CR and continue to implement this procedure.

5.4.2 Notify the SM/ED of your arrival and assumption of the ERF Communicator-CR duties.

5.4.3 If applicable, obtain the status of notifications and verification call backs from the Notifier.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 15 of 32

5.4.4 IF there is an event: DECLARATION, ESCALATION, DE-ESCALATION, CHANGE IN PAR, TERMINATION, OR ENTRY INTO RECOVERY, AND directed by the SM/ED, go to EPIP-AD-07 OR EPIP-EOF-08 AND make the appropriate event notifications.

5.4.5 Review the need for the Notifier or additional communicator support.

5.4.6 IF additional Communicator support is needed, THEN contact the Technical Support Center Director

5.4.7 IF State and County notifications and ERO notifications are complete, or if a Notifier is implementing them, THEN enter the 4-Way Communications Link. The “dial in number” and “access number” are listed in the KPB Emergency Telephone Directory, ETD 03, “Emergency Response Facilities Telephone List.”

5.4.8 Notify the EOD of any significant events.

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

5.4.10 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.4.4.

5.4.11 WHEN Final Conditions (Section 6.0) are met:

- a. Verify that the bell switch on the emergency government verification line is in the ON position.
- b. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- c. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

5.5 The Control Room Support Person (SP-C) shall:

5.5.1 WHEN directly notified, paged by radio-pager, or hearing the event announcement:

- a. Report to the Control Room immediately.
- b. IF a Control Room Support Person has been designated, THEN until released, assist the Control Room Support Person, as instructed.
- c. IF a Control Room Support Person has NOT been designated, THEN assume the responsibilities of the Control Room Support Person and continue to implement this procedure.

5.5.2 Initiate or maintain accountability in the Control Room (EPIP-SEC-03).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 16 of 32	

5.5.3 Support the Control Room staff with:

- a. Chronological log of events
- b. Copying and faxing
- c. Answering telephones

5.5.4 Review the need for additional Control Room Support Personnel.

5.5.5 IF additional Support Personnel are needed, THEN notify the EOD.

5.5.6 If appropriate, plan for a shift relief per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."

5.5.7 Notify the EOD of any significant issues.

5.5.8 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.5.2.

5.5.9 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

5.6 **Shift Technical Advisor** shall:

Note

The Shift Technical Advisor shall be capable of responding to the Control Room within 10 minutes.

5.6.1 Report to the Control Room to be briefed on plant conditions.

5.6.2 Assist the Shift Manager in assessing plant conditions and determining emergency classification as defined in EPIP-AD-02, "Emergency Class Determination."

Note

The responding NRC Communicator may be asked to assist in NRC notification. Off-site and other needed ERO or ERF communications shall be completed before the ERF Communicator-CR can provide this support, unless there is more than one ERF Communicator-CR available.

5.6.3 Perform NRC Notification:

- a. Gather information needed to prepare the NRC "Event Notification Worksheet," Form GNP-11.04.04-1.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 17 of 32

Note

If needed, the commercial telephone number is (301) 951-0550.

- b. Notify the NRC (Headquarters, Rockville) as soon as possible, but not more than one hour after declaration of the Event, using the Emergency Notification System (ENS) phone.

Note

The NRC may request continuous communications per 10CFR50.72(c)(3). The STA must coordinate this activity with accident assessment until arrival of an NRC Communicator OR activation of the TSC allows them to assume this activity.

- c. Provide the NRC with the necessary information from a completed Event Notification Worksheet.

5.6.4 **WHEN** the NRC Communicator arrives **OR** the TSC accepts responsibility for NRC communications and plant status and other activities are at a point that it is appropriate, turn NRC communications over by taking the following actions:

- a. Brief on plant conditions, the status of NRC notification and updates.
- b. Inform them that you are turning over responsibility for NRC communications to them.
- c. Ensure date and time is entered in the Control Room Chronological Log of Events for turnover of responsibilities for NRC communications from the STA.

5.6.5 Support the Control Room staff with technical and analytical assistance in diagnosing abnormal events and to ensure adequate core cooling.

5.6.6 Monitor plant conditions and provide assistance as needed to the Shift Manager.

5.6.7 **IF** Final Conditions (Section 6.0) have **NOT** been met, **THEN** go to Step 5.6.5.

5.6.8 **WHEN** Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 18 of 32

5.7 Event Operations Director (EOD) shall:

5.7.1 WHEN notified that an Emergency has been declared:

- a. Report to the Control Room.
- b. IF an Event Operations Director has been designated, THEN until released,
 - If appropriate, plan a shift relief per EPIP-AD-05, AND
 - Assist the designated Event Operations Director.
- c. IF an Event Operations Director has NOT been designated, THEN assume the responsibilities of the Event Operations Director and continue implementation of this procedure.

Note

Verbally inform the Shift Manager that you have accepted the EOD responsibilities.

5.7.2 Accept formal turnover of responsibilities (for EOD) from SM to include:

- TSC and EOF communications
- Maintaining verification of accountability
- Staffing of Control Room
- Processing work requests
- Monitoring fire fighting operations and maintaining accountability of fire team
- Obtaining additional assistance from Emergency Response Organization
- Monitoring and support of plant operations

5.7.3 Notify the SM/ED of your arrival and assumption of Event Operations Director responsibilities.

5.7.4 Ensure date and time is entered in the Control Room Chronological Log of Events for turnover of responsibilities for EOD from SM.

5.7.5 WHEN they are activating, verify DAROME communication links with TSC and EOF.

5.7.6 When appropriate, accept a briefing from the Shift Manager and STA.

5.7.7 Verify Control Room personnel accountability is being maintained.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 19 of 32	

- 5.7.8 Review Control Room staffing requirements, AND
- a. Direct the Notifier/Communicator to contact additional operations personnel as needed and request that they report to the site (See KPB Emergency Telephone Directory for names and numbers).
 - b. Release any personnel NOT required.
- 5.7.9 Assess overall plant status.
- Verify equipment status and instrument indications.
 - Verify Radiation monitors for abnormal indications.
 - Review corrective actions that have been taken.
- 5.7.10 As necessary, make any recommendations to the Shift Manager.
- 5.7.11 Brief the Emergency Director of any changes on:
- Off-site Notifications (EPIP-AD-07 or EPIP-EOF-08)
 - Plant Operations Status
 - Control Room support priorities
- 5.7.12 Inform the RPD of any changes in radiological indications.
- 5.7.13 If required, request technical or maintenance support from the ED.
- 5.7.14 Prepare all work requests (WR) for approval.
- a. Review WR and designate retest requirements.
 - b. If required to do the job, determine and initiate system lineups and tagouts.
- 5.7.15 Brief the Control Room staff periodically on:
- Emergency response status
 - Priorities
 - Specific guidance and assignments
- 5.7.16 If appropriate, plan for shift relief per EPIP-AD-05.
- 5.7.17 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.7.5.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 20 of 32	

5.7.18 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records and logs from all documents generated during the course of the event.
- c. Schedule a self critique with all CR event participants (all shifts) as soon as practical.

5.8 **Radiological Protection Director (RPD) shall:**

5.8.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Radiation Protection Director has been designated, THEN until released,
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated RPD.
- c. IF a Radiation Protection Director has NOT been designated, THEN assume the responsibilities of the RPD and continue implementing this procedure.

5.8.2 Notify the ED/TSCD of your arrival in the TSC and assumption of RPD responsibilities.

5.8.3 Direct the staff to activate the RPO/RAF (EPIP-RET-02A, "RPO - RAF Activation").

5.8.4 When conditions warrant, the RPD shall relocate the RPO to the RAF.

5.8.5 Direct staff to establish Radiation Emergency Team organization (EPIP-RET-02, "In-Plant Radiation Emergency Team").

5.8.6 If required, verify personnel accountability in RPO is being maintained.

5.8.7 If required, assist the SAD in search and rescue operations (EPIP-OSF-04).

5.8.8 Check radiological and meteorological information available in the TSC.

5.8.9 If needed, contact the Data Coordinator or ERF Communicator-TSC for additional Area and Process radiation monitor information.

5.8.10 Verify that emergency radiation controls are being implemented (EPIP-AD-11).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-04	Rev. AM
	Title KNPP Response to Alert or Higher	
	Date MAR 18 2003	Page 21 of 32

5.8.11 Verify controlled area access is being maintained (EPIP-RET-02D, "Emergency Radiation Entry Controls and Implementation").

Note

Ensure the Control Room is prepared to support sampling.

5.8.12 As dictated by the emergency event, direct the Chemistry Emergency Team (CET) or In-Plant Radiation Emergency Team (IRET) to take samples and to implement additional IRET and CET procedures.

- "Gaseous Effluent Release Path, Radioactivity, and Release Rate Determination," EPIP-RET-02B
- "Liquid Effluent Release Paths," EPIP-RET-03A
- "Post Accident Operation of the High Radiation Sample Room," EPIP-RET-03C
- "Containment Air Sampling Analysis Using CASP," EPIP-RET-03D
- "SBF Operation/Relocation," EPIP-RET-04A
- "Site Boundary Dose Rates During Controlled Plant Cooldown," EPIP-RET-05
- "Contamination Control of the Aurora Medical Center," HP-01.020
- "Post Accident Population Dose," EPIP-RET-09

5.8.13 IF dose calculation capability is NOT available in the EOF AND a radioactive release has occurred or there is the potential for a release, THEN:

- a. Direct the staff to perform dose projections (EPIP-ENV-03C, "Dose Projection Using RASCAL Version 2.2 Software").
- b. Maintain an overall awareness of environmental conditions and the contributing factors for development of protective action recommendations in accordance with procedure EPIP-AD-19.

5.8.14 Monitor plant conditions for indications of radioactive iodine and with concurrence of the ED make KI available, if appropriate (EPIP-AD-18).

5.8.15 If required, assist the SPD with Personnel Evacuation (EPIP-SEC-05).

Note

Transportation of a contaminated injured person shall be to the Aurora Medical Center and an IRET should be dispatched to the hospital.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 22 of 32	

Note

IF there is a question as to the extent of injuries, THEN it should be treated as a critical injury.

Note

Off-Site Support Agencies and their phone numbers are listed in the KPB Emergency Telephone Directory.

5.8.16 IF there are injuries or vehicle accidents associated with plant personnel or contractors, THEN contact the appropriate support agencies.

a. IF the injury is a "Medical Attention (Critical) Injury" or a vehicle accident with injuries (see NAD-02.09 for definition of critical injuries), THEN:

1. Contact the County Sheriff's office with jurisdiction at the location of the injury(s). (Kewaunee County has jurisdiction on the KNPP site.)

- Kewaunee County Dispatch - 911
- Manitowoc County Dispatch - (920) 683-4200

2. Notify the dispatcher of the accident and/or injury and request a rescue squad (all critically injured personnel shall be transported by rescue squad).

3. Provide the dispatcher with the following information:

- Your name, position, and return telephone number.
- The location of the accident and when it occurred.
- How many and how the injury(s) occurred.
- Nature and extent of injuries and condition of the patient(s).
- If any, extent of radioactive contamination and instructions that transportation of a potentially contaminated injured person shall be to the Aurora Medical Center.
- Plant name, location.
- If required, plant access instructions.

4. IF the injury is on-site, THEN:

- Inform the SPD of your request for a rescue squad and its estimated time of arrival.
- Direct the SPD to have the vehicle driven to the proper plant entrance.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 23 of 32	

5. IF the accident potentially involves radioactive contamination, THEN:
 - Dispatch an IRET member to the accident site for contamination control.
 - Dispatch an IRET member to the Aurora Medical Center to assist the hospital staff.
 6. Insure that the requirements for "Injury/Illness Response," NAD-02.09, are implemented.
 7. Inform the Emergency Director, Emergency Response Manager, and the Plant Spokesperson of the accident and details of the injuries.
- b. IF the Injury is a "Medical Attention (Non-critical) Injury," THEN:

Note

Any KNPP or contractor vehicle may be used for transport of (non-critical) injured personnel.

1. Arrange for transportation of the injured person.
2. Direct the SPD to have the vehicle driven to the proper plant entrance.
3. Contact the hospital or clinic and provide the following information:
 - Your name, position, and return telephone number.
 - When, how many, and how the injury(s) occurred.
 - Nature of injuries and condition of the patient.
 - If any, extent of radioactive contamination.
 - Plant name, location, and access instructions.
 - Estimated time of arrival for the patient(s) at the hospital or clinic.
4. IF there are contaminated injuries, THEN send an IRET member to the Aurora Medical Center to assist the hospital staff.
5. Insure that the requirements for "Injury/Illness Response," NAD-02.09, are implemented.
6. Inform the Emergency Director, Emergency Response Manager, and the Plant Spokesperson of the accident and details of the injuries.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 24 of 32	

- 5.8.17 Brief the Emergency Director of plant radiological conditions:
- Status of Radiological Effluent Releases (potential off-site dose consequences).
 - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure).
 - Status of Personal Injuries or Vehicle Accidents.
 - Availability of Potassium Iodide (EPIP-AD-18).
- 5.8.18 Review the personnel requirements in the RPO/RAF and:
- a. As needed, direct the staff to contact additional Radiation Emergency Team (RET) members.
 - b. Release any RPO/RAF staff not required.
- 5.8.19 If appropriate for long term accident support, then coordinate with the ALD to establish contract support.
- 5.8.20 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.8.21 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.8.5.
- 5.8.22 WHEN Final Conditions (Section 6.0) are met:
- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
 - b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
 - c. Verify all samples collected have been cataloged and appropriately stored.
 - d. Schedule a self critique with all event participants in the RPO/RAF (all shifts) as soon as practical.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 25 of 32	

5.9 **Technical Support Center Director (TSCD) shall:**

5.9.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. If a Technical Support Center Director has been designated, UNTIL released:
 - Assist in the activation of the TSC per EPIP-TSC-02.
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated TSCD.
- c. IF a Technical Support Center Director has NOT been designated, THEN assume the responsibilities of the TSCD and continue implementing this procedure.

5.9.2 Notify the Emergency Director of your assumption of TSCD responsibilities.

5.9.3 Notify TSC staff of your assumption of TSCD responsibilities.

5.9.4 Verify that the TSC is being activated (EPIP-TSC-02).

5.9.5 Verify accountability is being maintained in the TSC (EPIP-SEC-03).

5.9.6 Determine the TSC activity status by obtaining the following information from TSC staff.

- a. _____ Operations Coordinator:
 - TSC support of control room activities
 - Technical support of IPEOPs (EPIP-TSC-10, "Technical Support for IPEOPs")
- b. _____ Engineering Coordinator:
 - Design change activities (EPIP-TSC-04, "Emergency Physical Changes, Major Equipment Repair")
 - Work requests (EPIP-OSF-03, "Work Requests During an Emergency")
 - Support Activities

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 26 of 32	

- c. _____ Core Hydraulics Coordinator:
 - Core Damage Assessment (EPIP-TSC-09A)
 - If appropriate, Steam Release Calculations (EPIP-TSC-08A, "Calculations for Steam Release from Steam Generators")
 - If appropriate, Head Venting Calculations (EPIP-TSC-07, "RV Head Venting Time Calculation")
- d. _____ Quality Control Coordinator:
 - QC concerns
 - Warehouse activities
- e. _____ Data Coordinator:
 - Status of data collection and posting (EPIP-TSC-03)
 - Significant changes in plant parameters
- f. _____ ERF Communicators
 - CR, TSC, EOF, JPIC Communication (4-Way Communications Link)
 - NRC communications
 - Emergency Response Data System

5.9.7 Contact the Emergency Director (ED) and obtain information on plant status.

5.9.8 Brief the Emergency Director on TSC activities.

- TSC Activation and Operational Status (EPIP-TSC-02)
- Significant Plant Trends
- Core Damage Assessment (EPIP-TSC-09A)

5.9.9 Ensure the TSC staff is informed of plant status and ED priorities.

5.9.10 Review TSC staffing requirements.

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

5.9.12 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.9.5.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 27 of 32	

5.9.13 WHEN Final Conditions (Section 6.0) are met:

- a. Ensure the TSC and OSF are de-activated per "Technical Support Center Activation," EPIP-TSC-02.
- b. Collect all records and logs from all documents generated during the course of the event.
- c. Schedule a self critique with all event participants in the TSC (all shifts) as soon as practical.

5.10 **Support Activities Director (SAD)** shall:

5.10.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Support Activities Director has been designated, THEN until released,
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated SAD.
- c. IF a Support Activities Director has NOT been designated, THEN assume the responsibilities of the SAD and continue implementing this procedure.

5.10.2 Notify the Emergency Director of your assumption of SAD responsibilities.

5.10.3 Notify the OSF staff that you have assumed the responsibilities of Support Activities Director.

5.10.4 Direct the OSF coordinator to implement EPIP-OSF-02.

5.10.5 Designate an OSF assembly area giving consideration to manpower pool size and environmental conditions.

5.10.6 If needed, direct the OSF coordinator to initiate search and rescue operations (EPIP-OSF-04).

5.10.7 Contact the Emergency Director for information on plant status and immediate actions.

5.10.8 Direct emergency maintenance activities in accordance with the priorities established by the Emergency Director.

5.10.9 If required, request engineering support from the Engineering Coordinator.

5.10.10 Review the maintenance staffing requirements to mitigate the incident.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 28 of 32	

5.10.11 Brief the Emergency Director on OSF activities.

- OSF Activation and operational status
- OSF Facility Operations (EPIP-OSF-02)
- Maintenance Activities
- Search and Rescue (EPIP-OSF-04)

5.10.12 Ensure the OSF staff is informed of plant status and ED priorities.

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

5.10.14 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.10.6.

5.10.15 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in the OSF (all shifts) as soon as practical.

5.11 **Site Protection Director (SPD) shall:**

5.11.1 WHEN notified that an Emergency has been declared:

- a. Report to the Security Building.
- b. If a Site Protection Director has been designated, UNTIL released:
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated SPD.
- c. IF a Site Protection Director has NOT been designated, THEN assume the responsibilities of the SPD and continue implementing this procedure.

5.11.2 Notify the ED/TSCD of your arrival in the Security Building and assumption of the SPD responsibility.

5.11.3 Direct the implementation of "Security Force Response to Emergencies," EPIP-SEC-02.

5.11.4 Establish "Personnel Assembly and Accountability," EPIP-SEC-03.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 29 of 32	

- 5.11.5 IF Search and Rescue is required due to accountability results, THEN notify the Support Activities Director.
- 5.11.6 Direct the security staff to issue dosimetry to personnel responding from off-site (EPIP-SEC-04).
- 5.11.7 When appropriate, relocate to the TSC.
- 5.11.8 Obtain information from the RPD or the Control Room concerning fire, chemical, or radiological hazards present within the protected area.
- 5.11.9 IF hazards identified by the RPD or the Control Room warrant it, THEN restrict ERO personnel movement.
- 5.11.10 IF directed by the ED, THEN initiate a plant evacuation (EPIP-SEC-05).
- 5.11.11 Brief the Emergency Director on security activities:
- Removal of Visitors from site (i.e., fishermen) (EPIP-SEC-02)
 - Personnel Accountability (EPIP-SEC-03)
 - Plant Evacuations (EPIP-SEC-05)
 - Access Control
 - Dosimetry Issue (EPIP-SEC-04)
 - Significant Security Activities
- 5.11.12 Ensure that the Security Force and staff are informed of any significant issues relative to their activities.
- 5.11.13 Ensure accountability is maintained (EPIP-SEC-03).
- 5.11.14 Review security staffing requirements and make appropriate adjustments.
- 5.11.15 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.11.16 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.10.8.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 30 of 32	

5.11.17 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in Security (all shifts) as soon as practical.

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 EIPs.

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 COMTRAK 87-152, Downgrading of EALs
- 7.3 COMTRAK 88-068, Calling in additional communicators as required
- 7.4 NRC Inspection Report K-87-195, same as Reference 7.2
- 7.5 10CFR50.72(c)(3), Maintaining open communications with the NRC
- 7.6 NAD-02.09, Injury/Illness Response
- 7.7 EPIP-AD-02, Emergency Class Determination
- 7.8 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.9 EPIP-AD-07, Initial Emergency Notifications
- 7.10 EPIP-AD-11, Emergency Radiation Controls
- 7.11 EPIP-AD-15, Recovery Planning and Termination
- 7.12 EPIP-AD-18, Potassium Iodide Distribution
- 7.13 EPIP-AD-19, Protective Action Guidelines
- 7.14 EPIP-AD-20, KNPP Response to a Security Threat
- 7.15 EPIP-ENV-03C, Dose Projection Using RASCAL Version 2.2 Software

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 31 of 32	

- 7.16 EPIP-EOF-08, Continuing Emergency Notifications
- 7.17 EPIP-OSF-02, Operational Support Facility Operations
- 7.18 EPIP-OSF-03, Work Requests During an Emergency
- 7.19 EPIP-OSF-04, Search and Rescue
- 7.20 EPIP-RET-02, In-Plant Radiation Emergency Team
- 7.21 EPIP-RET-02A, RPO - RAF Activation
- 7.22 EPIP-RET-02B, Gaseous Effluent Release Path, Radioactivity, and Release Rate Determination
- 7.23 EPIP-RET-02D, Emergency Radiation Entry Controls and Implementation
- 7.24 EPIP-RET-03A, Liquid Effluent Release Paths
- 7.25 EPIP-RET-03C, Post Accident Operation of the High Radiation Sample Room
- 7.26 EPIP-RET-03D, Containment Air Sampling Analysis Using CASP
- 7.27 EPIP-RET-04A, SBF Operation/Relocation
- 7.28 EPIP-RET-05, Site Boundary Dose Rates During Controlled Plant Cooldown
- 7.29 HP-01.020, Contamination Control of the Aurora Medical Center
- 7.30 EPIP-RET-09, Post-Accident Population Dose
- 7.31 EPIP-SEC-02, Security Force Response to Emergencies
- 7.32 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.33 EPIP-SEC-05, Personnel Evacuation
- 7.34 EPIP-TSC-02, Technical Support Center Activation
- 7.35 EPIP-TSC-04, Emergency Physical Changes, Major Equipment Repair
- 7.36 EPIP-TSC-07, RV Head Venting Time Calculation
- 7.37 EPIP-TSC-10, Technical Support for IPEOPs
- 7.38 EPIP-TSC-09A, Core Damage Assessment

REFERENCE USE

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-04	Rev.	AM
	Title	KNPP Response to Alert or Higher		
	Date	MAR 18 2003	Page 32 of 32	

7.39 KPB Emergency Telephone Directory

7.40 EPMP-02.01, Declared Emergency Evaluation and Documentation

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

- Event Notice, Form EPIPF-AD-07-01
- Event Notification Worksheet, Form GNP-11.04.04-1

8.1.2 Non-QA Records

None

WISCONSIN PUBLIC SERVICE CORP.		No. EPIP-AD-07	Rev. AT
Kewaunee Nuclear Power Plant		Title Initial Emergency Notifications	
<i>Emergency Plan Implementing Procedure</i>		Date MAR 18 2003	Page 1 of 7
Reviewed By Bill Bartelme		Approved By Rick Repshas	
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 the Security Notifier (SEC-N), ERF Communicator - Control Room (ERFCM-C), Operations crew members, or Off-Site Communicator (OFFCM) for notification of Off-Site Authorities of an emergency event escalation, de-escalation, change in Protective Action Recommendation (PAR), termination, or entry into recovery, as directed by the Shift Manager (SM), Emergency Director (ED), or Emergency Response Manager (ERM).

2.0 General Notes

- 2.1 IF approached by the media during a declared emergency, THEN refer them to the Joint Public Information Center (JPIC) at (920) 433-1400 or 1-(800) 838-6192 and tell them that this is their most accurate source for information.
- 2.2 IF more than one communicator is available, THEN it is preferred that Steps 5.1 and 5.2 be performed in parallel.

3.0 Precautions and Limitations

- 3.1 Once indication is available that an emergency action level has been exceeded, classification must be made as soon as possible and must not exceed 15 minutes. Once a classification has been declared, notification must be initiated and in progress to the State and County agencies within 15 minutes of event classification using "Event Notice," Form EPIPF-AD-07-01.
- 3.2 UNTIL off-site notifications are transferred to the Emergency Operations Facility (EOF) or Technical Support Center (TSC), verify the bell switch on Government Verification Phone is ON in the Control Room.
- 3.3 IF an event is terminated prior to the initial notification of the event, THEN the off-site notification of the declaration of the event AND the termination of the same event can be made simultaneously by using an appropriately completed "Event Notice," Form EPIPF-AD-07-01. Notification of the Emergency Response Organization (ERO) (Step 5.2) is not required in this circumstance.
- 3.4 IF an emergency class escalation, de-escalation, change in PAR, termination, or entry into recovery occurs during the notification AND prior to transfer of off-site notifications to the TSC or EOF, THEN disregard any remaining steps and return to Step 5.1. Begin the appropriate actions and notifications for the new emergency level.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-07	Rev.	AT
	Title	Initial Emergency Notifications		
	Date	MAR 18 2003	Page 2 of 7	

4.0 Initial Conditions

- 4.1 This procedure is initiated for the Initial event notifications and will continue to be used for event notifications until the State of Wisconsin Emergency Operations Center (State EOC) is activated. This procedure shall be implemented upon an event • **DECLARATION**, • **ESCALATION**, • **DE-ESCALATION**, • **CHANGE IN PAR**, • **TERMINATION**, or • **ENTRY INTO RECOVERY**, as directed by the SM/ED or ERM.

5.0 Procedure

Note

IF the State EOC is activated, THEN go to "Continuing Emergency Notifications," EPIP-EOF-08.

Note

Step 5.1 is to be performed by the Notifier, if available.

5.1 Notify the State and County of the Event

Check

- 5.1.1 Verify that any "Event Notice," Form EPIP-AD-07-01, received from the SM/ED or ERM has their approval signature, date, and time. _____
- 5.1.2 Complete block 12 of Form EPIP-AD-07-01. _____
- 5.1.3 Complete Attachment A of EPIP-AD-07, "State and County Event Notification." _____

Note

Step 5.2 is to be performed by the Notifier, if available.

5.2 Notify the ERO of the Event

- 5.2.1 Verify that a pager access code has been selected on Form EPIP-AD-07-04, "ERO Event Notification," Step 4, by the SM/ED or ERM. _____
- 5.2.2 Verify that a pager message code has been selected on Form EPIP-AD-07-04 "ERO Event Notification," Step 5, by the SM/ED or ERM. _____
- 5.2.3 Complete Form EPIP-AD-07-04, "ERO Event Notification." _____

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-07	Rev. AT
	Title Initial Emergency Notifications	
	Date MAR 18 2003	Page 3 of 7

Note

Steps 5.3 and 5.4 are NOT to be performed by the ERF Communicator-CR.

5.3 FAX Event Notice

Check

5.3.1 Obtain fax cover sheet, Form EPIPF-EOF-08-03, "Fax for Emergency Declaration or Status Updates." _____

5.3.2 Send fax broadcast of completed "Event Notice," Form EPIPF-AD-07-01 with fax cover sheet, by following instructions on Form EPIPF-AD-07-03, "Fax Event Notice." _____

5.3.3 Contact the Point Beach Duty Shift Manager at (920) 755-6247 and notify him that an "Event Notice" has been faxed to him. _____

5.4 Return Form EPIPF-AD-07-01 to the SM/ED or ERM who approved the "Event Notice." _____

5.5 WHEN final conditions are met (Step 6.0), THEN return to EPIP-AD-03, "KNPP Response to an Unusual Event," OR EPIP-AD-04, "KNPP Response to Alert or Higher," OR EPIP-EOF-04, "EOF Staff Action for Alert or Higher," at the step you left the procedure. _____

6.0 Final Conditions

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

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-APPX-A-1, Communication System Description
- 7.3 KPB Emergency Telephone Directory
- 7.4 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.5 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.6 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.7 EPIP-EOF-08, Continuing Emergency Notifications

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-07	Rev.	AT
	Title	Initial Emergency Notifications		
	Date	MAR 18 2003	Page 4 of 7	

- 7.8 Form EPIPF-AD-07-01, Event Notice (Nuclear Accident Reporting System Form (NARS))
- 7.9 Form EPIPF-AD-07-03, FAX Event Notice
- 7.10 Form EPIPF-AD-07-04, ERO Event Notification
- 7.11 Form EPIPF-EOF-08-03, Fax for Emergency Declaration or Status Updates

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

- Event Notice (Nuclear Accident Reporting System Form (NARS)), Form EPIPF-AD-07-01
- Attachment A, State and County Event Notification
- Form EPIPF-AD-07-03, FAX Event Notice
- Form EPIPF-AD-07-04, ERO Event Notification

8.1.2 Non-QA Records

None

STATE AND COUNTY EVENT NOTIFICATION

(Page 1 of 3)

Date and Time: _____

Check

1. Verify the bell switch for the Government verification phone at your station is ON. _____
2. Pick up the Dial Select phone and verify the line is clear. _____
 - a. IF someone is using the Dial Select line, THEN state that you have a "PRIORITY 2" notification. They will clear the line unless they have a "PRIORITY 1" call.
 - b. IF someone states they have a "PRIORITY 1" conversation, THEN acknowledge their priority and monitor the call until they finish.
3. WHEN the line is clear, Dial "22" (All Call for agencies to be notified). _____
 - a. IF the Dial Select system is not operating, THEN go to Step 9 (Using Secondary Method, Commercial Phone).

Note

Either Warning Center I or Warning Center II may respond. Both are NOT required to respond.

4. WHEN each party acknowledges: _____
 - a. Answer by stating: "This is the Kewaunee Nuclear Plant - Please stay on the line for a Nuclear Accident Reporting System (NARS) message."
 - b. Record the time each agency responds on top of Form EPIPF-AD-07-01 (NARS form).
 - c. After all agencies have answered press the # key to cancel the ringing.
 - IF after five (5) rings an agency has not answered, THEN press the individual's Dial Select number from the table below.

AGENCY	DIAL SELECT #
All Call	22
State Warning Center I or II	93 (I) and 83 (II)
Kewaunee County Sheriff Dispatch	13
Manitowoc County Sheriff Dispatch	54

- WAIT up to five (5) more rings, THEN press the "#" key to cancel ringing.
 - IF unable to contact a specific agency, THEN continue with the notification of agencies on the line.
5. Read the message on Form EPIPF-AD-07-01 text aloud, SLOWLY AND DELIBERATELY, using number and letter designations (Ref: "Phonetic Alphabet.") _____
 6. Say: "State Warning Center, please read back this message to verify accuracy."(Pause to allow message to be read back.) _____

STATE AND COUNTY EVENT NOTIFICATION
(Page 2 of 3)

Check

7. Say: **"Have all agencies received this message?"** (Wait for Reply.)
8. Say: **"Relay this information to Emergency Management immediately. Have the appropriate personnel verify this message by placing a return phone call to KNPP at 920-388-0101."**
9. IF any agencies did not respond to the Dial Select, THEN complete the State and County Event Notification using the secondary method, commercial phone.

AGENCY	COMMERCIAL #
State Warning Center I or II	1 (800) 943-0003
Kewaunee County Sheriff	1 (920) 388-7108
Manitowoc County Sheriff	1 (920) 683-4201

- a. Call each applicable agency number in the order shown above.
- b. WHEN the party answers, record the time on Form EPIPF-AD-07-01 (NARS form).
- c. Read the message on Form EPIPF-AD-07-01 text aloud, **SLOWLY AND DELIBERATELY**, using number and letter designations (Ref: "Phonetic Alphabet.")
- d. Say: **"(agency name), please read back this message to verify accuracy."**(Pause to allow message to be read back.)
- e. Say: **"Relay this information to Emergency Management immediately. Have the appropriate personnel verify this message by placing a return phone call to KNPP at 920-388-0101."**
- f. **UNTIL** all agencies have been notified, repeat Steps a through e.
10. Inform SM/ED/ERM that initial notifications have been made and you are waiting for verification callbacks.

**STATE AND COUNTY EVENT NOTIFICATION
(Page 3 of 3)**

Check

Note

WHILE monitoring for callbacks you may continue with other steps in EPIP-AD-07.

11. Monitor government verification line for Call Backs.

- a. WHEN calls are received from State or Local Emergency Government Officials, record time of call, caller name, and phone number.

	<u>Time</u>	<u>Name</u>	<u>Contact Phone #</u>
State of Wisconsin (Duty Officer)	_____	_____	_____
Manitowoc County (Emerg. Mgnt. Dir.)	_____	_____	_____
Kewaunee County (Emerg. Gov. Dir.)	_____	_____	_____

- b. IF we have not received verification call backs from each of the off-site officials within 45 minutes from the time recorded for Roll-Call on Form EPIPF-AD-07-01, THEN re-initiate the notification process for those officials by starting at Step 9.
- c. IF further information or verification is requested, THEN transfer calls coming from State or Local Emergency Government Officials or the State Radiological Coordinator to the SM/ED/ERM or his designee.

12. Inform SM/ED/ERM when all verification callbacks have been received.

13. Return to procedure Step 5.2.