

NRC-03-049

10 CFR 50, App. E

May 7, 2003

U.S. Nuclear Regulatory Commission
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KEWAUNEE NUCLEAR POWER PLANT
DOCKET 50-305
LICENSE No. DPR-43
RADIOLOGICAL EMERGENCY RESPONSE PLAN IMPLEMENTING PROCEDURES

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

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



Thomas Coutu
Site Vice-President, Kewaunee Plant

SLC

Attachment

cc US NRC Senior Resident Inspector, w/attach.
US NRC, Region III (2 copies), w/attach.
Electric Division, PSCW, w/o attach.
QA Vault, w/o attach.

DOCUMENT TRANSMITTAL

KEWAUNEE NUCLEAR POWER PLANT

FROM: DIANE FENCL - KNPP

TRANSMITTAL DATE 04-29-2003

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

OUTSIDE AGENCY COPIES (1-20)

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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.

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M. Daron - Security Building (46)
C. Grant - EOF (81)
C. Grant - OSF (52)
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STF Library (43)

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D. Krall - CR/SS Office (51, 56)
C. Grant - TSC (50)
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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)
M. Fencl - Security (121)

S. Zutz - Security Building (120)
Ops Admin. (126)
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C. Grant - EOF Response Binder (Partial Distribution)
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Please follow the directions when updating your EPIP Manual. **WATCH FOR DELETIONS!!!** These are controlled procedures and random checks may be made to ensure the manuals are kept up-to-date.

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

**KEWAUNEE NUCLEAR POWER PLANT
REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES
April 29, 2003**

Please follow the directions listed below.

EPIP Index, dated 04-29-2003.

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-RET-02	V	EPIP-RET-02	W
EPIP-RET-09	L	EPIP-RET-09	M
EPIP-TSC-04	N	EPIP-TSC-04	O
EPIP-APPX-A-06	AA	EPIP-APPX-A-06	AB
Figure EPIPFG-APPX-A-06-04 (filed after EPIP-APPX-A-06)	C	Figure EPIPFG-APPX-A-06-04 (File after EPIP-APPX-A-06)	D
Figure EPIPFG-APPX-A-06-05 (filed after EPIP-APPX-A-06)	C	Figure EPIPFG-APPX-A-06-05 (File after EPIP-APPX-A-06)	D
Figure EPIPFG-APPX-A-06-06 (filed after EPIP-EOF-12)	C	Figure EPIPFG-APPX-A-06-06 (File after EPIP-EOF-12)	D
Figure EPIPFG-APPX-A-06-06 (filed after EPIP-APPX-A-06)	C	Figure EPIPFG-APPX-A-06-06 (File after EPIP-APPX-A-06)	D
Figure EPIPFG-APPX-A-06-07 (filed after EPIP-APPX-A-06)	C	Figure EPIPFG-APPX-A-06-07 (File after EPIP-APPX-A-06)	D
Figure EPIPFG-APPX-A-06-10 (filed after EPIP-APPX-A-06)	B	Figure EPIPFG-APPX-A-06-10 (File after EPIP-APPX-A-06)	C
Form EPIPF-TSC-04-01	G	Form EPIPF-TSC-04-01	H
Form EPIPF-TSC-04-03	F	Form EPIPF-TSC-04-03	G

Return a signed and dated copy of this transmittal letter, within 10 days of transmittal date, to the sender. If you have any questions or comments, please contact Jeanne Ferris ext. 8545.

I CERTIFY Copy No. _____ (WPSC No.) of
the Kewaunee Nuclear Power Plant's EIPs has
been updated.

SIGNATURE

DATE

Please return this sheet to *DIANE FENCL*.

Diane Fencl
Enclosure

EMERGENCY PLAN IMPLEMENTING PROCEDURES**INDEX****DATE: 04-29-2003**

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: 04-29-2003

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: 04-29-2003**

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: 04-29-2003**

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	W	04-29-2003
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: 04-29-2003

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	M	04-29-2003
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: 04-29-2003

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 Modifications	O	04-29-2003
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: 04-29-2003

FIGURES					
EPIP	FIG #	Figure EIPFPG	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	D	04-29-2003
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	Media Briefing Center	D	04-29-2003
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	C	04-29-2003
EPIP-APPX-A-06	EP-FIG-044	APPX-A-06-07	JPIC - State and County Work Area - WPSC D2-8	D	04-29-2003
EPIP-APPX-A-06	EP-FIG-045	APPX-A-06-05	JPIC - Utility Work Area - WPSC D2-7	D	04-29-2003
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: 04-29-2003

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 Figures	AB	04-29-2003

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 04-29-2003

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: 04-29-2003

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: 04-29-2003

FORM EPIPF	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 Modification Request	H	04-29-2003
TSC-04-02	Emergency Physical Change Safety Review	Deleted	05-09-2002
TSC-04-03	Emergency Modification Index	G	04-29-2003
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-RET-02		Rev. W
		Title In-Plant Radiation Emergency Team		
		Date APR 29 2003		Page 1 of 5
Reviewed By Craig Long		Approved By Jerrie Morlino		
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 In-Plant Radiation Emergency Team (IRET), when activated.

2.0 General Notes

- 2.1 None

3.0 Precautions and Limitations

- 3.1 Depending on the nature, class, and magnitude of the emergency, the following list of priorities should be generally followed by the IRET:
- 3.1.1 Protection of personnel from high levels of radiation through radiation surveys and air activity surveys.
 - 3.1.2 Search and rescue for life saving.
 - 3.1.3 First Aid.
 - 3.1.4 Issue dosimetry and respiratory equipment.
 - 3.1.5 Health Physics (HP) coverage for operation or repair of vital equipment.
 - 3.1.6 Radiologically Controlled Area (RCA) access restrictions.
 - 3.1.7 Assist Fire Brigade.
 - 3.1.8 Sampling for gaseous effluent release characterization.
 - 3.1.9 Off-site dose projection.
 - 3.1.10 Assist Chemistry personnel for primary coolant and containment post accident sampling and analysis.
 - 3.1.11 Assist and support the site and environmental monitoring teams as required.
 - 3.1.12 Document radiation exposures to personnel.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-02	Rev.	W
	Title	In-Plant Radiation Emergency Team		
	Date	APR 29 2003	Page 2 of 5	

4.0 Initial Conditions

- 4.1 An Alert or higher emergency has been declared at the Kewaunee Nuclear Power Plant (KNPP).

5.0 Procedure

5.1 In-Plant Radiation Emergency Team (IRET) Activation

- 5.1.1 WHEN notified of an emergency at KNPP, assemble in the Radiation Protection Office (RPO).

- 5.1.2 IF the RPO is not habitable, or at the direction of the Radiological Protection Director (RPD), THEN report to the Radiological Analysis Facility (RAF).

5.2 IRET Duties

- 5.2.1 Implement procedure EPIP-RET-02A, "Radiation Protection Office/Radiological Analysis Facility (RPO/RAF) Activation."

- 5.2.2 Dispatch an IRET member to the Site Boundary Facility (SBF) to perform the following:

- a. Assume the duties of the SBF Coordinator.
- b. Implement EPIP-RET-04, "SBF Activation."

- 5.2.3 Restrict access into the RCA to emergency related activities as authorized by the Emergency Director (ED) or the RPD.

- 5.2.4 If any abnormal radioactive releases are occurring use EPIP-RET-02B, "Gaseous Effluent Release Path, Radioactivity, and Release Rate Determination."

- 5.2.5 IF a radioactive release is imminent or occurring, AND the Technical Support Center/Emergency Operations Facility (TSC/EOF) is NOT activated, THEN complete the following steps:

- 5.2.5.1 Obtain meteorological conditions from one of the following:

- a. Plant Information Computer System
- b. PPCS Computer Graphic Output in the TSC
(Group Number 9 - Meteorological Data)
- c. Chart recorders in the TSC

- 5.2.5.2 Perform off-site dose projections per 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-RET-02	Rev.	W
	Title	In-Plant Radiation Emergency Team		
	Date	APR 29 2003	Page 3 of 5	

5.2.5.3 Advise the Shift Manager/Emergency Director (SM/ED) of the results.

Note

At an Alert or higher, dosimetry will be issued to arriving emergency personnel in the Security Building per EPIP-SEC-04, "Security Force Actions for Dosimetry Issue."

5.2.6 IF an Alert or higher is declared, THEN issue dosimetry to all on-site personnel, AND read aloud two times on the Gai-tronics the following message:

Attention in the plant, attention in the plant, dosimetry is required for all on-site personnel. Dosimetry will be issued at all on-site emergency facilities and accountability centers.

5.2.7 WHEN initial issue of dosimetry is completed, THEN read aloud two times on the Gai-tronics the following message:

Attention in the plant, attention in the plant, dosimetry has been issued at all on-site emergency facilities and accountability centers. If you have not yet received dosimetry contact the RP Group at ext. _____.

5.2.8 WHEN an emergency entry into the RCA is planned, THEN provide radiological protection coverage in accordance with EPIP-AD-11, "Emergency Radiation Controls."

5.2.9 Assist in search and rescue operations in controlled areas.

5.2.10 Perform surveys outside the RCA to ensure contamination control.

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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-RET-02	Rev. W
	Title In-Plant Radiation Emergency Team	
	Date APR 29 2003	Page 4 of 5

5.3 In-Plant Radiation Emergency Team Support (IRETS) Personnel

Note

IRETS personnel may perform limited surveys (measure dose rates, collect smears, and air samples). Dose rates shall be reviewed and smears and air samples shall be analyzed by a qualified Radiation Protection Technician (RPT).

5.3.1 WHEN assigned, perform the following duties:

- a. Hand out dosimetry.
- b. IF Potassium Iodide is approved for use, THEN aid in the distribution of the thyroid blocking agents in accordance with EPIP-AD-18, "Potassium Iodide Distribution."
- c. Monitor for continued habitability of site facilities.
- d. Perform other duties as assigned by Radiation Protection Supervision.

5.4 Subsequent Actions

5.4.1 When directed by the RPD or ED, perform the following:

- 5.4.1.1 Emergency surveys in accordance with EPIP-RET-02D, "Emergency Radiation Entry Controls and Implementation."
- 5.4.1.2 Effluent gas sampling in accordance with EPIP-RET-02B.
- 5.4.1.3 Document emergency exposures in accordance with EPIP-AD-11, "Emergency Radiation Controls."
- 5.4.1.4 Interface with Point Beach Nuclear Plant for the following additional support and resources, if needed:
 - Personnel
 - Emergency equipment
 - Sample transportation
 - Sample analysis
 - Assistance with injuries
- 5.4.1.5 Maintain interim storage for highly contaminated samples.
- 5.4.1.6 Evaluate availability and procurement of supplies which may be required.
- 5.4.1.7 Interface with Environmental, Inc. for off-site sample analysis.
- 5.4.1.8 Evaluate methods of recovery planning in accordance with EPIP-AD-15, "Recovery Planning and Termination."

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-02	Rev.	W
	Title	In-Plant Radiation Emergency Team		
	Date	APR 29 2003	Page 5 of 5	

6.0 Final Conditions

- 6.1 Plant Emergency has been Terminated.

7.0 References

- 7.1 EPIP-RET-02A, Radiation Protection Office/Radiological Analysis Facility (RPO/RAF) Activation
- 7.2 EPIP-RET-02B, Gaseous Effluent Release Path, Radioactivity, and Release Rate Determination
- 7.3 EPIP-RET-02D, Emergency Radiation Entry Controls and Implementation
- 7.4 EPIP-RET-04, SBF Activation
- 7.5 EPIP-ENV-03C, Dose Projection Using RASCAL Version 2.2 Software
- 7.6 EPIP-SEC-04, Security Force Actions for Dosimetry Issue
- 7.7 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.8 EPIP-AD-11, Emergency Radiation Controls
- 7.9 EPIP-AD-15, Recovery Planning and Termination
- 7.10 HP-01.020, Contamination Control of the Aurora Medical Center
- 7.11 EPIP-AD-18, Potassium Iodide Distribution

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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-RET-09	Rev.	M
		Title	Post-Accident Population Dose		
		Date	APR 29 2003	Page 1 of 7	
Reviewed By Rick Adams		Approved By Jerrie Morlino			
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 determining integrated radiation doses at preselected geographical locations within the 10-mile EPZ and at other locations of interest based on population density.

2.0 General Notes

- 2.1 Approximately 179 Thermoluminescent Dosimeters (TLDs) are posted in the environment for the purpose of post accident environmental dose determination. TLDs are located on Electrical Distribution Power Poles. For map locations contact the WPSC Electric Distribution and Engineering Department (EDE) in Green Bay. It is these TLDs which would be utilized during the recovery phase of an accident to acquire data for use in quantifying dose to the population from radioactive materials released from the plant to the environment.
- 2.2 Other TLDs placed in the environment by Kewaunee Nuclear Power Plant (KNPP) as part of the Radiological Environmental Monitoring Program (REMM, Table 2.2.1-A) and the Area Monitoring Program (TLD), per procedure HP-03.010, can also be used for this same purpose.

3.0 Precautions and Limitations

- 3.1 It must be stressed that this procedure is to be done only after the plant has been placed in a safe shutdown condition and releases of radioactive material to the environment greater than Offsite Dose Calculation Manual (ODCM) limits have ceased. Changeout of these TLDs is to be part of the long-term recovery and assessment of an accident involving radioactive releases.

4.0 Initial Conditions

- 4.1 None

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-09	Rev.	M
	Title	Post-Accident Population Dose		
	Date	APR 29 2003	Page 2 of 7	

5.0 Procedure

5.1 Preparation for TLD Changeout

- 5.1.1 Obtain a duplicate set of TLDs used for post accident monitoring. These are obtained from the vendor per the applicable purchase order. Each post accident TLD is mounted near a 3" x 4" sign. Signs are green with white lettering and attached to the power poles (See Attachment A).
- 5.1.2 Place the control TLDs into a lead safe.
- 5.1.3 Spike 10 additional TLDs to a nominal exposure of 1 Rem (Cesium-137). Then place these into the lead safe. Label all badges placed in the lead safe with the date spiked, exposure, and batch to which they belong. Retain these for further reference along with the control TLDs.

5.2 TLD Changeout

- 5.2.1 Obtain a copy of the electrical distribution department pole maps. If not readily available at KNPP, contact the Electric Distribution and Engineering Department (EDE) in Green Bay for a set of these maps as stated under Step 2.1. Mounting locations for the TLDs are as follows:

TLD #	LOCATION	TLD #	LOCATION	TLD #	LOCATION
1	2124-2R5	61	2224-23E19	121	2324-14W19
2	2124-11R14	62	2224-23W9	122	2324-22W12
3	2124-11L1	63	2224-26W1	123	2324-16L18
4	2124-10W2	64	2224-22R4	124	2324-29E6
5	2124-2W1	65	2224-27R1	125	2324-19L6
6	2124-2L18	66	2224-27R7	126	2324-27L20
7	2124-3W20	67	2224-34E5	127	2324-26E17
8	2124-4W3	68	2224-24R4	128	2325-30L20
9	2124-6W12	69	2224-33R6	129	2325-31E10
10	2124-6R26	70	2224-28R9	130	2223-10L13
11	2124-4L18	71	2224-28E5	131	65A7
12	2124-8L3	72	2224-22L2	132	2025-31E11
13	2124-7L12	73	2224-22W8	133	2325-8E1
14	2124-16W5	74	2224-22E11	134	2425-32R4
15	2124-16E9	75	2224-12R3	135	2324-1R11
16	2124-15L13	76	2224-12L9	136	2324-10L6
17	2124-16L9	77	2224-14W6	137	2323-13E6

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-09	Rev.	M
	Title	Post-Accident Population Dose		
	Date	APR 29 2003	Page 3 of 7	

TLD #	LOCATION	TLD #	LOCATION	TLD #	LOCATION
18	2124-20W5	78	2224-14W11	138	2323-24L3
19	2123-13R7	79	2224-16E5	139	2323-33E6
20	2123-14L1	80	2224-16L15	140	2223-9W15
21	2123-11R4	81	2224-8R11	141	2223-29E9
22	2323-1W2	82	2224-8L4	142	2123-8E2
23	2124-26E1	83	2223-12L2	143	2123-21R11
24	2124-23L27	84	2223-13R8	144	2123-35L12
25	2124-26E14	85	2224-17R10	145	2024-9L10
26	2124-25L8	86	2224-20R6	146	2024-14R4
27	2025-4W17	87	2224-19R3	147	2025-30E11
28	2025-6R12	88	2224-29R19	148	Coast Guard Station - Two Rivers
29	2024-2R15	89	2224-31E8	149	WPSC - Two Rivers Ops Bldg.
30	2025-6W14	90	2224-32E14	150	Manitowoc City Hall Roof
31	2124-27R13	91	2224-32R22	151	1924-9E11
32	2124-33E6	92	2224-31R1	152	2525-33R9
33	2124-32L27	93	2224-31L5	153	KNPP SW Fence
34	2024-10R12	94	2223-25E1	154	KNPP West Fence @ SW End
35	2025-7L23	95	2223-23E5	155	KNPP West Fence Center
36	2025-9R2	96	2223-33E2	156	KNPP West Fence @ North End
37	2124-21L8	97	2223-35E7	157	KNPP North Fence West End
38	2124-29W1	98	2223-27E5	158	KNPP North Fence Center
39	2124-14L21	99	2223-16E11	159	KNPP North Fence East End
40	2124-31L48	100	2223-15E7	160	KNPP East Fence North End
41	2124-25R3	101	2223-3E5	161	KNPP East Fence East of ATF
42	2123-26W15	102	2223-2R5	162	KNPP East Fence East of Admin

INFORMATION USE

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-09	Rev.	M
	Title	Post-Accident Population Dose		
	Date	APR 29 2003	Page 4 of 7	

TLD #	LOCATION	TLD #	LOCATION	TLD #	LOCATION
43	2123-16E14	103	2224-6L11	163	KNPP @ Vent House over Forebay
44	2123-4R30	104	2324-32L7	164	KNPP East Fence Near Gatehouse
45	2123-4W8	105	2224-9W15	165	KNPP South Fence Near Gatehouse
46	2224-26R4	106	2224-4R22	166	KNPP South Fence Near Anx/Wrhse
47	2224-26L7	107	2224-4E1	167	Near Circ Water Discharge
48	2224-35R12	108	2224-3W2	168	SE Corner of KNPP South Plant Parking Lot
49	2224-35R1	109	2224-2E7	169	Pole Near Old Met Tower
50	2224-36W6	110	2225-6W2	170	2224-36W15 Near New Met Tower
51	2224-35E2	111	2224-12W11	171	KNPP Sewage Plant N Wall at Fence
52	2224-26R18	112	2224-2L12	172	NE Corner of Microwave Tower Fence
53	2224-26R15	113	2224-3L8	173	SE Corner of Switch Yard Fence Line
54	2224-26R11	114	2323-35E2	174	Substation SE Corner of Building
55	2224-26E13	115	2323-36E11	175	SE Corner of STF Building
56	2224-23R1	116	2324-29L3	176	Power Pole Near STF Pump House
57	2224-25W16	117	2324-35W13	177	North Woods @ Garage
58	2224-24R1	118	2324-36W7	178	South School Forest Gazebo NW Corner Post
59	2224-13R3	119	2325-8L1	179	South Parking Lot @ SW Corner
60	2224-24W3	120	2324-13L4		

5.2.2 Obtain a portable micro-rem meter (Eberline PRM-7 or Ludlum-12S).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-09	Rev.	M
	Title	Post-Accident Population Dose		
	Date	APR 29 2003	Page 5 of 7	

- 5.2.3 Assemble the maps, TLDs, micro-rem meter, data sheets, tools, and a clipboard in a vehicle. Then proceed to each location listed above.
- 5.2.4 TLDs are mounted on power poles approximately 2 meters above ground level. The TLDs are attached to the pole by a metal clip or velcro.
- 5.2.5 TLD placement on the pole is in relation to the plant. In other words, it is mounted on the pole such that it is facing the direction of KNPP, not shielded from the plant by the pole.
- 5.2.6 Remove the existing TLD, replace it with the new one.
- 5.2.7 Complete Form EPIPF-RET-09-01, logging the date and time changed, notes as to its condition (e.g., tampered with, sign defaced, missing, etc.). Take a reading with the micro-rem meter and record.
- 5.2.8 After all TLDs have been replaced, return to the plant.

5.3 TLD Dose Determination

- 5.3.1 Ship all post accident TLDs, spiked TLDs, and control TLDs to the vendor.
- 5.3.2 Once the TLD dose report is received back from the vendor, prepare a report of gamma dose by TLD location and micro-R per hour readings at the same location. Also determine from all results obtained:
 - a. Average corrected gamma reading for each EPZ sector.
 - b. Highest corrected gamma reading for each EPZ sector.
- 5.3.3 Based on previously available TLD readings at these locations, calculate a net dose attributable to the release of radioactivity from the plant. Previous TLD readings provide a base line for comparison, which is subtracted, from the post accident TLDs.
- 5.3.4 Route all results to the Radiation Protection Manager. These results will be factored in with existing land use census data from REMM 2.4.1.b and population distribution data from the Emergency Plan, Appendix C, to determine total population dose.

6.0 Final Conditions

- 6.1 None

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-09	Rev.	M
	Title	Post-Accident Population Dose		
	Date	APR 29 2003	Page 6 of 7	

7.0 References

7.1 WPSC Electrical Distribution and Engineering Department drawings:

- 7.1.1 E-131-2, Two Rivers Rural Primary District
- 7.1.2 E-134, Kewaunee Rural Primary District
- 7.1.3 E-134-2, Kewaunee Rural Primary District
- 7.1.4 F-1036, City of Kewaunee, Kewaunee Urban Primary District

7.2 EPIP Appendix B, Forms

7.3 HP-03.010, Area Monitoring Program (TLD)

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

- Environmental TLD Record Sheet, Form EPIPF-RET-09-01

8.1.2 Non-QA Records

None

- Environmental TLD Sign
- Actual Size 3" x 4"
- Green with White Lettering
- Ensure updated Radiation Protection Office phone number is applied.



WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No. EPIP-TSC-04	Rev. O
		Title Emergency Modifications	
		Date APR 29 2003	Page 1 of 3
Reviewed By Jeanne Ferris		Approved By Jerrie Morlino	
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 establishing the controls and documentation for changes to equipment or systems necessary during a declared emergency.
- 1.2 This procedure applies to the Engineering Coordinator and other Technical Support Center (TSC) staff members designated by the Technical Support Center Director (TSCD) or Engineering Coordinator implementing modifications during a declared emergency.

2.0 General Notes

- 2.1 10CFR50.54 (x) and (y) provide that a licensee may take reasonable action that departs from a license condition or a technical specification in an emergency when this action is immediately needed to protect the public health and safety and no action consistent with license conditions and technical specifications that can provide adequate or equivalent protection is immediately apparent. This action shall be approved, as a minimum, by a licensed senior operator prior to taking the action.

3.0 Precautions and Limitations

- 3.1 None

4.0 Initial Conditions

- 4.1 Plant is in a declared emergency with the Technical Support Center activated.

5.0 Procedure

Note

Normal plant procedures should be used, if time and conditions permit.

5.1 Initiation and Implementation of an Emergency Modification (EM)

- 5.1.1 Complete EM Request (Form EPIPF-TSC-04-01).
- 5.1.2 Complete a 50.59 Screening/Evaluation in accordance with NAD-04.04, "Changes, Tests, and Experiments."
- 5.1.3 Assign a number to the EM from the EM Index (Form EPIPF-TSC-04-03).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-TSC-04	Rev.	O
	Title	Emergency Modifications		
	Date	APR 29 2003	Page 2 of 3	

5.1.4 Review the EM with the TSCD, OR

IF the EM affects plant safety, THEN call necessary PORC members together for an Emergency PORC Meeting.

5.1.5 Following the TSCD or PORC review, ensure all signatures are obtained and dated on the EM Form.

5.1.6 Ensure all appropriate prints are clearly marked with the needed modifications and copies are made for distribution to the Technical Support Center (TSC), Control Room (CR), and Operational Support Facility (OSF).

5.1.7 Review the EM with the Event Operations Director and Shift Manager.

- a. Determine that plant conditions are acceptable prior to allowing the installation of the EM.

Note

For some changes, a DANGER tag is inappropriate and cannot be placed, and therefore, is not required. This should be noted on the EM Form.

- b. Ensure a tagout is prepared for the conditions necessary for installation of the EM.
- c. Ensure the tagout number is recorded on the EM Form.
- d. Have the Shift Manager sign the EM Form.
- e. Ensure the original EM Form is filed in the Shift Manager's office.

5.1.8 Coordinate with the Support Activities Director to install the EM in accordance with the applicable Work Request.

5.2 Closing Out an EM

5.2.1 Upon closeout or entry into the recovery phase, the TSCD will:

- a. Review the EM Index and initiate NMC FP-E-MOD-02, "Configuration Change Control," as applicable for all EMs that have not been removed, OR
- b. Remove the EM if no longer needed.

6.0 **Final Conditions**

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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-TSC-04	Rev.	O
	Title	Emergency Modifications		
	Date	APR 29 2003	Page	3 of 3

7.0 References

- 7.1 NMC FP-E-MOD-02, Configuration Change Control
- 7.2 NAD-04.04, Changes, Tests, and Experiments (10CFR50.59)
- 7.3 EPIP Appendix B, Forms
- 7.4 COMTRAK 87-153

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

- Emergency Modification Request, Form EPIPF-TSC-04-01

8.1.2 Non-QA Records

- Emergency Modification Index, Form EPIPF-TSC-04-03

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-APPX-A-06	Rev.	AB
		Title	KNPP Emergency Response Facility Figures		
		Date	APR 29 2003	Page 1 of 2	
Reviewed By Rich Johnson		Approved By Jerrie Morlino			
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 a detailed listing of the KNPP Emergency Response Facility floor plans.

2.0 General Notes

- 2.1 This Appendix may be used as a reference document for any declared emergency, as defined in EPIP-AD-02, "Emergency Classification."

3.0 Precautions and Limitations

- 3.1 None

4.0 Initial Conditions

- 4.1 None

5.0 Procedure

- 5.1 Figure EPIPFG-APPX-A-06-01, Radiological Analysis Facility - KNP Floor Plan
- 5.2 Figure EPIPFG-APPX-A-06-02, Site Boundary Facility - KNP Floor Plan
- 5.3 Figure EPIPFG-APPX-A-06-03, Technical Support Center - KNP Floor Plan
- 5.4 Figure EPIPFG-APPX-A-06-04, EOF - WPSC D2-3 Floor Plan
- 5.5 Figure EPIPFG-APPX-A-06-05, JPIC - Utility Work Area Diagram - WPSC D2-7
- 5.6 Figure EPIPFG-APPX-A-06-06, Media Briefing Center
- 5.7 Figure EPIPFG-APPX-A-06-07, JPIC - State and County Work Area - WPSC D2-8
- 5.8 Figure EPIPFG-APPX-A-06-08, State/County Work Area - WPSC D2-1 Floor Plan
- 5.9 Figure EPIPFG-APPX-A-06-09, NRC Work Area - WPSC D2-4 Floor Plan
- 5.10 Figure EPIPFG-APPX-A-06-10, JPIC - Federal Work Area - WPSC D2-9

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-APPX-A-06	Rev.	AB
	Title	KNPP Emergency Response Facility Figures		
	Date	APR 29 2003	Page 2 of 2	

6.0 Final Conditions

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

7.0 References

- 7.1 None

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 MODIFICATION REQUEST

NO. _____

1.0 DESCRIPTION OF CHANGE _____

2.0 REFERENCE DRAWINGS _____

3.0 REASON FOR CHANGE _____

4.0 SPECIAL PRECAUTIONS _____

5.0 ESTIMATED DURATION OF EMERGENCY MODIFICATION _____

Requested By (Originator) _____ Date _____

6.0 REVIEWED BY (TSCD) _____ Date _____

Approved by (Emergency Director) _____ Date _____

7.0 INITIAL DISTRIBUTION: Orig. (EOD), Copy 1 (SAD), Copy 2 (TSCD), Copy 3 (Plt File)

TAGOUT NO. _____

8.0 INSTALLATION

Install. allowed by (Shift Mgr.) _____ Date _____

Installed by _____ Date _____

Ind. Verification _____ Date _____

9.0 REMOVAL

Removal allowed by (Shift Mgr.) _____ Date _____

Removed by _____ Date _____

Ind. Verification _____ Date _____

10.0 NOTIFY EMERGENCY DIRECTOR OF REMOVAL _____

(Shift Mgr./Date)

11.0 REVIEW

Assistant Manager - Operations _____ Date _____

12.0 FINAL DISTRIBUTION:

Original (QA File)

Copy 1 (Manager - Operations)

Copy 2 (Training Manager - Operations)

Copy 3 (Training Manager - Technical)

Copy 4 (Manager - Nuclear Oversight)

Copy 5 (Assistant Manager - Operations)

Copy 6 (Manager - Engineering Systems)

EMERGENCY MODIFICATION INDEX

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