

Kewaunee Nuclear Power Plant

Operated by Nuclear Management Company, LLC

NRC-03-086

10 CFR 50, App. E

August 11, 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 (EPIPs). These revised procedures supersede the previously submitted procedures.

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

Thomas Coutu

Site Vice-President, Kewaunee Plant

Kaken for

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

KEWAUNEE NUCLEAR POWER PLANT REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES July 31, 2003

Please follow the directions listed below.

EPIP Index, dated 07-31-2003.

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-03	AH	EPIP-AD-03	AI
EPIP-AD-04	AM	EPIP-AD-04	AN
EPIP-AD-07	AT	EPIP-AD-07	AU
EPIP-ENV-01	W	EPIP-ENV-01	X
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EPIP-RET-02	W	EPIP-RET-02	X
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EPIP-TSC-10	K	EPIP-TSC-10	L
Form EPIPF-AD-07-04	С	DELETED	
Form EPIPF-ENV-01-01	D	Form EPIPF-ENV-01-01	E
Form EPIPF-ENV-01-02	В	Form EPIPF-ENV-01-02	С
Form EPIPF-ENV-01-04	В	Form EPIPF-ENV-01-04	С
Form EPIPF-ENV-02-01	N	Form EPIPF-ENV-02-01	0
Form EPIPF-EOF-02-01	Т	Form EPIPF-EOF-02-01 (Clears TCI dated 10-03-2002)	U
Form EPIPF-TSC-01-03	В	Form EPIPF-TSC-01-03	С

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 Jerrie Morlino at 8719.

I CERTIFY Copy No	(WPSC No.) of			
the Kewaunee Nuclear Power Plant's EPIPs has				
been updated.				
•				
CICNIATURE	TO 4 (EVC			
SIGNATURE	DATE			

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EPIP-AD-03	KNPP Response to an Unusual Event	AI	07-31-2003
EPIP-AD-04	KNPP Response to Alert or Higher	AN	07-31-2003
EP-AD-5	Site Emergency	Deleted	04-27-87
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	E	02-18-2003
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* EP-TSC-8B was	totally deleted; therefore, EP-TSC-8C was changed to	EP-TSC-8B	
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TSC-02-05	TSC and OSF De-Activation Checklist	С	01-28-2003
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TSC-09A-01	Core Exit Thermocouple Data	D	05-16-2002
TSC-09A-02	Fuel Rod Clad Damage Estimate	D	05-16-2002
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WISCON	ISIN PUBLIC SER	VICE CORP.	No.	EPIP-A	AD-03	Rev. A	ΛI
Kewaunee Nuclear Power Plant Emergency Plan Implementing Procedure		Title KNPP Response to an Unusual Event			t		
		Date	JU	л . 31 2003	Page 1 of	29	
Reviewed By	Richard Johnson		Approv	ed By	errie Morlino		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		☐ Yes ☑ No	SRO Approval (Temporary Changes Requi	_	Yes 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 <u>IF</u> approached by the media during a declared emergency, <u>THEN</u> 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.

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. 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.
- 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 <u>UNTIL</u> 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.	No.	EPIP-AD-03	Rev. AI
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- 3.4 The ED should carefully consider the status of activities (especially those identified in Step 3.3 above) when electing to locate to the TSC. Locating to the TSC prior to TSC activation should be carefully considered.
- 3.5 <u>IF</u> an event or condition may have existed which exceeded an EAL criteria but no emergency was declared <u>AND</u> the basis for the emergency classification no longer exists at the time of this discovery, NO classification should be made. This is because the conditions for the classification no longer exist.

An ENS notification (or an ENS update if the event was previously reported but misclassified) shall be provided to the NRC within one hour of the discovery of the undeclared (or misclassified) event. Emergency Preparedness shall be notified of the undeclared or misclassified event. Emergency Preparedness shall provide an update to the State and Counties concerning the event.

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 <u>IF</u> a credible security threat (Lo) exists, <u>THEN</u> 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.

Note

Assembly is conducted at the discretion of the SM/ED for an Unusual Event.

- 5.1.3 Determine if personnel assembly is needed based on the nature of the event and their judgment of threat to plant staff safety.
- 5.1.4 <u>IF</u> assembly could present an unacceptable risk to plant employees as a result of a security event, <u>THEN</u> do <u>NOT</u> initiate assembly. (Reference Operations Procedure E-0-08).

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5.1.5	Determ	nine the level of the ERO support needed:
		CREDIBLE SECURITY THREAT - UNUSUAL EVENT
		Pager access code "9244" AND "9255" Pager message code "44666" [Envelope D]
		CREDIBLE SECURITY THREAT - ALERT
		Pager access code "9244" AND "9255" Pager message code "44777" [Envelope E]
		UNUSUAL EVENT (Directors and Select Staff) – No activation of ERFs
		Pager access code "9211" AND "9222" Pager message code "66666" [Envelope F]
5.1.6	Contac	et Secondary Alarm Station (SAS):
		rect activation of ERO pagers with selected pager access code and pager essage code per Step 5.1.5.
5.1.7	Choose	e and perform the appropriate plant announcement using plant Gai-tronics.
		epare your Gai-tronics message by making the choices identified in the propriate box below.
		assembly is NOT required, read aloud two (2) times over the Gai-tronics message below.
	emerg	ention all personnel. We are experiencing an Unusual Event. Designated gency response directors should report to their duty locations. No ional response is required at this time."
		Choose (1) or (2)
	(1) 1	No personnel protective actions are required at this time.
	n	Personnel should avoid the (plant area)

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- 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) ______
- 5.1.8 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
- 5.1.9 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 5.1.8.
- 5.1.10 Direct the STA to notify the NRC in accordance with Step 5.5.3 of this procedure.
- 5.1.11 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.
- 5.1.12 Log all significant events and actions.
- 5.1.13 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

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<u>Note</u>

Refer to Attachment A of this procedure for "Turnover Briefing Worksheet Control Room to Emergency Director/ERM."

- 5.1.14 <u>UNTIL</u> 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 <u>WHEN</u> notified that an Emergency has been declared:
 - a. Report to the Control Room or TSC.
 - b. <u>IF</u> an Emergency Director has been designated, <u>UNTIL</u> released, <u>THEN</u> assist the designated Emergency Director.
 - c. <u>IF</u> an Emergency Director has <u>NOT</u> been designated, <u>THEN</u> notify the Shift Manager of your intent to assume the responsibilities of the Emergency Director and continue implementation of this procedure.
 - 5.2.2 <u>WHEN</u> 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.

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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. Locate 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 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> suspend further use of this procedure and go to EPIP-AD-04 Step 5.2.7.

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5.2.9		the response status with an information gathering briefing. Include the mergency 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.

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- 5.2.12 WHEN appropriate, brief the emergency directors on plant conditions and priorities.
- 5.2.13 <u>IF</u> the ERM has not assumed the responsibility, <u>THEN</u> provide Plant Emergency status updates to off-site authorities.
 - a. <u>IF off-site EOCs are activated, THEN</u> use the Dial Select to contact off-site organizations.
 - b. <u>IF off-site organization EOCs are NOT activated, WHEN</u> 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.

<u>Note</u>

In fast breaking events, the ED may give verbal authorization instead of written approval to release the statement.

- d. Review and approve news statements prior to being released to the media.
- 5.2.14 Review the need for any Emergency Director Assistants.
- 5.2.15 <u>IF</u> plant conditions indicate the need to activate the full emergency response organization, <u>THEN</u>:
 - a. Direct SAS to activate pagers for all emergency response personnel (group code 9233), using Envelope A.
 - b. Notify all Directors of your decision to activate the full ERO.
 - 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 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> go to Step 5.2.5.

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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 EPIPs.
- b. <u>IF</u> the event is an ENTRY INTO RECOVERY, <u>THEN</u> read aloud two (2) times on the Gai-tronics the message below.

"Attention all personnel. We have entered plant recovery operations. R	eview
final conditions of all procedures and restore all emergency response	
materials and equipment to their proper location. Appropriate inventori	ies
should be performed and supplies replenished as needed. Use of EPIPs	
suspended when all final actions have been completed to the satisfaction	on of
the facility Director. The Recovery Manager is a	nd the
Environmental Liaison is	·"

c. <u>IF</u> the event is an emergency class **TERMINATION**, <u>THEN</u> 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 EPIPs 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 EPIPF-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 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 <u>WHEN</u> notified or upon hearing the Event announcement (except when a Security Event is in progress), report immediately to the SM in the Control Room.

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- 5.3.2 <u>WHEN</u> directed by the Emergency Director/Shift Manager, perform event notifications. Go to EPIP-AD-07.
- 5.3.3 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> suspend further use of this procedure and go to EPIP-AD-04 Step 5.3.2.
- 5.3.4 <u>IF</u> an Emergency Response Facility (ERF) Communicator-Control Room (CR) is not available, <u>THEN</u> assume the role of the ERF Communicator-CR and go to Step 5.4.4.
- 5.3.5 <u>UNTIL</u> 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 <u>WHEN</u> directly notified, paged by radio-pager, or hearing the event announcement:
 - a. Report to the Control Room immediately.
 - b. <u>IF</u> an ERF Communicator-CR has been designated, <u>UNTIL</u> released, THEN assist the ERF Communicator-CR as instructed.
 - c. <u>IF</u> an ERF Communicator-CR has <u>NOT</u> been designated, <u>THEN</u> 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 <u>IF</u> there is an event •DECLARATION, •TERMINATION, or •ENTRY INTO RECOVERY, and directed by the SM/ED, <u>THEN</u> go to EPIP-AD-07 or EPIP-EOF-08 and make the appropriate event notifications.

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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. <u>IF</u> 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," <u>THEN</u> enter the 4-Way Communication Link.
 - b. <u>IF</u> no, <u>THEN</u> make yourself available to support the ED, EOD, or STA.
- 5.4.6 <u>IF</u> requested by the STA, <u>THEN</u> provide communications support with the NRC.

<u>Note</u>

<u>IF</u> there is an event escalation, <u>THEN</u> 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 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> 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 <u>IF</u> additional communicator support is needed, <u>THEN</u> 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 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> go to Step 5.4.4.

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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

<u>IF</u> all off-site and ERO notifications are complete, <u>THEN</u> 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.

<u>Note</u>

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.

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- 5.5.4 <u>WHEN</u> 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 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> suspend further use of this procedure and go to EPIP-AD-04 Step 5.6.5.
- 5.5.8 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> 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. <u>IF</u> an Event Operations Director has been designated, <u>UNTIL</u> released, <u>THEN</u> assist the designated Event Operations Director.
 - c. <u>IF</u> an Event Operations Director has <u>NOT</u> been designated, <u>THEN</u> notify the Shift Manager of your intent to assume the responsibilities of the Event Operations Director and continue implementation of this procedure.

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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 <u>WHEN</u> 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).
 - 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.

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- 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 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> suspend further use of this procedure and go to EPIP-AD-04 Step 5.7.5.
- 5.6.17 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> 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.

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5.7 Radiological Protection Director (RPD) shall:

- 5.7.1 <u>WHEN</u> notified that an Emergency has been declared:
 - a. Report to the Radiation Protection Office (RPO).
 - b. <u>IF</u> a Radiation Protection Director has been designated, <u>UNTIL</u> released, <u>THEN</u> assist the designated RPD.
 - c. <u>IF</u> a Radiation Protection Director has <u>NOT</u> been designated, <u>THEN</u> 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

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

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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 <u>IF</u> there are injuries or vehicle accidents associated with plant personnel or contractors, <u>THEN</u> contact the appropriate support.
 - a. <u>IF</u> the injury is a "Medical Attention (Critical) Injury," see NAD-02.09 for definition of critical injuries, a vehicle accident with injuries, <u>THEN</u>:
 - 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.

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- 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. <u>IF</u> the Injury is a "Medical Attention (Non-critical) Injury," <u>THEN</u>:

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. <u>IF</u> there are contaminated injuries, <u>THEN</u> 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.

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- 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 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> suspend further use of this procedure and go to EPIP-AD-04 Step 5.8.5.
- 5.7.16 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> 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.

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5.8 Technical Support Center Director (TSCD) shall:

- 5.8.1 <u>WHEN</u> notified that an Emergency has been declared:
 - a. Report to the Technical Support Center (TSC).
 - b. <u>IF</u> a Technical Support Center Director has been designated, <u>UNTIL</u> released, <u>THEN</u> assist the designated TSCD.
 - c. <u>IF</u> a Technical Support Center Director has <u>NOT</u> been designated, <u>THEN</u> 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 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> 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.

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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. <u>IF</u> a Support Activities Director has been designated, <u>UNTIL</u> released, <u>THEN</u> assist the designated SAD.
 - c. <u>IF</u> a Support Activities Director has <u>NOT</u> been designated, <u>THEN</u> 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 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> suspend further use of this procedure and go to EPIP-AD-04 Step 5.10.6.
- 5.9.9 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> go to Step 5.9.3.
- 5.9.10 <u>WHEN</u> 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.

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5.10 Site Protection Director (SPD) shall:

- 5.10.1 <u>WHEN</u> notified that an Emergency has been declared:
 - a. Report to the Security Building.
 - b. <u>IF</u> a Site Protection Director has been designated, <u>UNTIL</u> released, <u>THEN</u> assist the designated SPD.
 - c. <u>IF</u> a Site Protection Director has <u>NOT</u> been designated, <u>THEN</u> 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 <u>IF</u> Search and Rescue is required due to accountability results, <u>THEN</u> 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 <u>IF</u> hazards identified by the RPD or the Control Room warrant it, <u>THEN</u> restrict personnel movement.
- 5.10.9 <u>IF</u> directed by the ED, <u>THEN</u> 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.

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- 5.10.14 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.10.15 <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, <u>THEN</u> 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 there 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 EPIPs.

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

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- 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

TURNOVER BRIEFING WORKSHEET CONTROL ROOM TO EMERGENCY DIRECTOR/ERM

Note: All blanks are not required to be completed. Α. **Emergency Classification Status** Unusual Event Alert Site Area Emergency General Emergency (circle): **Initiating Events:** 1. EAL Charts exceeded: EAL Charts monitored for escalation: Status of emergency procedure implementation and mitigating actions 2. ∕B. Plant / Reactor Status (circle): Stable Degrading **Improving** Safety System operation / problems: Fission Product Barrier 1. Fuel Cladding: Intact Potential Loss Lost **Primary Coolant: Potential Loss** Intact Lost _____ Containment: Intact Potential Loss Lost ____ Safety System Status: 2. **Evolutions in progress**

TURNOVER BRIEFING WORKSHEET CONTROL ROOM TO EMERGENCY DIRECTOR/ERM

		rities for Maintenance or assist	ance needed:	
4.	Radiological conditions	Release in progress (circle):	YES	N
On-	site Protective Actions			
Off-	site Protective Actions recomm	nended (only for a General En	nergency class	sificatio
	site Protective Actions recommends	nended (only for a General En	nergency class	sificatio
		nended (only for a General En	nergency class	sification
Off-		nended (only for a General En		sification
Off-	site Assistance Requests site Notifications		ion Time:	sification
Off-s	site Assistance Requests site Notifications	Last Notificat	ion Time:	sification

TURNOVER BRIEFING WORKSHEET CONTROL ROOM TO EMERGENCY DIRECTOR/ERM

9	Status of ERO activation
_	
_	
5	Status of Plant Accountability:
_	
_	
S	Status of outside agency mobilization
_	
-	btain a copy of all Event Notifications to State & Counties

TURNOVER BRIEFING WORKSHEET CONTROL ROOM TO EMERGENCY DIRECTOR/ERM

(HELP GUIDE)

- A. Emergency Classification Status
 - 1. Initiating Events and EALs exceeded:
 - Cause, history, and initiating events leading to emergency declaration
 - EALs exceeded
 - 2. Status of Emergency Procedure Implementation and Mitigating Actions
 - Status of progress in emergency procedures
 - Corrective actions taken
- B. Plant/Reactor Status

Condition / stability of reactor and plant conditions improving or declining

- 1. Fission Product Barrier and Safety System Status
 - Fission Product Barrier Status (Fuel, RCS, Containment)
 - Safety System alignments and status (flow rates, etc.)
- 2. Evolutions in Progress
 - Control Room activities
 - In plant activities (AOs, I&C, Mechanics)
- 3. Radiological Conditions
 - Known in plant conditions
 - Known releases and duration
- C. On-Site Protective Actions
 - Existing personnel hazards
 - Evacuations (local, site) and status of accountability or assembly
 - KI Administration (status)

TURNOVER BRIEFING WORKSHEET CONTROL ROOM TO EMERGENCY DIRECTOR/ERM

(HELP GUIDE)

- D. Off-Site Protective Actions
 - Status of Dose Assessment activities
 - PARs made to State/County Agencies
- E. Off-Site Assistance Request
 - Fire, rescue squad, and law enforcement assistance requested
- F. Off-Site Notifications
 - Status of notifications made to:
 - State and Counties
 - NRC
 - INPO
 - ANI
 - Any others
- G. Status of ERO Activation
 - Minimum staffing positions not reporting in to Automated Notification System
- H. Status of Plant Accountability
 - Security actions taken
 - Any missing individuals.
- I. Status of Outside Agency Mobilization
 - Any Reports that the State and Counties, NRC, etc., are activating
 - Requests from State/Counties/NRC, etc.
 - Time/Content of any News Releases
- J. Control Room Support Priorities for Maintenance or assistance needed
 - Key work items to support the Control Room
 - Equipment needed returned to service
 - Additional assistance needed to meet Control Room needs

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Reviewed By Jin	n Peterson		Approv	ed By	lerrie Morlino		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approval Temporary Changes Requ		☐ Yes ☑ 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.
- 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 <u>IF</u> approached by the media during a declared emergency, <u>THEN</u> 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.

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. 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.
- 3.2 The SM should remain in the Control Room during a declared emergency.

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- 3.3 The following responsibilities of the ED shall <u>NOT</u> 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 <u>UNTIL</u> the Emergency Response Manager assumes the responsibility following EOF activation, recommendations of protective actions to off-site authorities (EPIP-AD-19).
- 3.4 Given plant conditions, the ED has the option of initially reporting to the TSC or Control Room to receive a turnover.
- 3.5 <u>IF</u> an event or condition may have existed which exceeded an EAL criteria but no emergency was declared <u>AND</u> the basis for the emergency classification no longer exists at the time of this discovery, <u>THEN</u> NO classification should be made. This is because the conditions for the classification no longer exist.

An ENS notification (or an ENS update if the event was previously reported but misclassified) shall be provided to the NRC within one hour of the discovery of the undeclared (or misclassified) event. Emergency Preparedness shall be notified of the undeclared or misclassified event. Emergency Preparedness shall provide an update to the State and Counties concerning the event.

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 <u>IF</u> a security threat exists, <u>THEN</u> 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.

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5.1.3	Deterr	nine the ERO response needed:
		ALERT - Activate ERO and Emergency Response Facilities (ERFs)
		Pager access code "9233" Pager message code "77777" [Envelope A]
		SITE EMERGENCY - Activate ERO and Emergency Response Facilities (ERFs)
		Pager access code "9233" Pager message code "88888" [Envelope B]
		GENERAL EMERGENCY - Activate ERO and Emergency Response Facilities (ERFs)
		Pager access code "9233" Pager message code "99999" [Envelope C]
		CREDIBLE SECURITY THREAT - UNUSUAL EVENT
		Pager access code "9244" AND "9255" Pager message code "44666" [Envelope D]
		CREDIBLE SECURITY THREAT - ALERT
		Pager access code "9244" AND "9255" Pager message code "44777" [Envelope E]
		UNUSUAL EVENT (Directors and Select Staff)
		Pager access code "9211" AND "9222" Pager message code "66666" [Envelope F]
		TERMINATION OR RECOVERY
		Pager access code "9233" Pager message code "44444" [Envelope G]

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- 5.1.4 Contact Secondary Alarm Station (SAS):
 - a. Request a Notifier report to the Control Room immediately.
 - b. Direct activation of ERO pagers with selected pager access code and pager message code per Step 5.1.3.
 - c. Direct Security to initiate personnel assembly per EPIP-SEC-03, "Personnel Assembly and Accountability," unless assembly poses an unacceptable risk to plant employees.
 - d. Direct actions to be taken for EPIP-SEC-02, "Security Force Response to Emergencies."
 - Verify on-site members of the general public are directed to leave site.
 - Verify control measures for site access/egress are established.
- 5.1.5 <u>IF</u> assembly could present an unacceptable risk to plant employees as a result of a threat to plant staff safety or due to a security event, <u>THEN</u> do <u>NOT</u> initiate assembly. Go to Step 5.1.7 (Reference Operations Procedure E-0-08).
- 5.1.6 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)				

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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 <u>OR</u> Sigma Theta is less than 3.01 degrees. (Refer to Graphic Display #52 from the PPCS terminal).
- a. <u>IF</u> adverse meteorology does <u>NOT</u> exist, <u>THEN</u> complete Box 8 by getting the downwind sector(s) from Table 1 on the back of Form EPIPF-AD-07-01.
- b. <u>IF</u> adverse meteorology does exist, <u>THEN</u> enter N/A in Box 8 and explain in Box 11.
- c. <u>IF</u> the event is a General Emergency and adverse meteorology does <u>NOT</u> exist, <u>WHEN</u> completing Box 10, <u>THEN</u> 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. <u>IF</u> the event is a General Emergency and adverse meteorology exists, <u>WHEN</u> completing Box 10, <u>THEN</u> enter the following item:
 - (B) Evacuate <u>ALL</u> sectors out to <u>5</u> miles.
- e. <u>IF</u> the event is an Alert or Site Emergency, <u>WHEN</u> completing Box 10, <u>THEN</u> check the following item:
 - (A) None
- 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.
- 5.1.9 Direct the STA to notify the NRC in accordance with Step 5.6.3 of this procedure.
- 5.1.10 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.

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- 5.1.11 Log all significant events and actions.
- 5.1.12 Verify Control Room Ventilation System operation.
- 5.1.13 Report any increase in Control Room radiation to the Radiological Protection Director (RPD) for habitability assessment.
- 5.1.14 Request support from Technical Support Center (TSC) or OSF staff as needed.
- 5.1.15 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

Refer to Attachment A of this procedure for "Turnover Briefing Worksheet Control Room to Emergency Director/ERM."

- 5.1.16 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.
- 5.2 Emergency Director (Designated) shall:
 - 5.2.1 WHEN notified that an Emergency has been declared:
 - a. Report to the Control Room or TSC.
 - 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. <u>IF</u> an Emergency Director has <u>NOT</u> been designated, <u>THEN</u> notify the Shift Manager of your intent to assume the responsibilities of the Emergency Director and continue implementation of this procedure.

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5.2.2	When appropriate, accept a briefing from the Shift Manager and STA. Key point	S
	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.
- 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. Locate 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 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.

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5.2.9	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)

Warning

It is <u>NOT</u> 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 EPIPs are <u>NOT</u> 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 <u>IF</u> 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:
 - a. <u>IF</u> assembly could present an unacceptable risk to plant employees as a result of a Security Event, <u>THEN</u> do <u>NOT</u> initiate assembly. Go to Step 5.2.10(d).

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- b. <u>IF</u> accountability has <u>NOT</u> already been completed, <u>THEN</u>:
 - 1. Direct a Control Room staff member to sound the plant siren.
 - 2. <u>WHEN</u> 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. <u>IF</u> personnel assembly has been completed, <u>THEN</u>:
 - 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) _______.

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

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. <u>IF</u> time permits, <u>THEN</u> 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 classification, direct SAS to activate pagers for all emergency response personnel (group code 9233) using Envelope A.
- 7. Verify that required state and county notifications are made (EPIP-AD-07 or EPIP-EOF-08, "Continuing Emergency Notifications").
- e. <u>IF</u> the EOF has taken responsibility for off-site notifications and PARs, <u>THEN</u> 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.
- 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)

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- Availability of Potassium Iodide (EPIP-AD-18, "Potassium Iodide Distribution")
- Status of plant conditions that could warrant evacuation of non-essential plant personnel
- 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")
- 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
- Severe Accident Management Team Leader (SAMTL):
 - SAM Team Status
 - Severe Challenge Status
 - Strategies Implemented
 - Strategies being Evaluated
 - New Strategy Recommendations

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Once facility information has been gathered, conduct briefings among ERFs (TSC, EOF, CR). These briefings should be conducted as conditions warrant, or at least hourly, preferably by DAROME. (If the DAROME is not functional, the communication bridge or phone can be used).

- 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).
- 5.2.14 When appropriate, brief the 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).

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- 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 <u>IF</u> the ERM has <u>NOT</u> assumed the responsibility, <u>THEN</u> provide Plant Emergency status updates to off-site authorities.
 - a. <u>IF</u> off-site EOCs are activated, <u>THEN</u> use the Dial Select to contact off-site organizations.
 - b. <u>IF off-site organization EOCs are NOT activated, WHEN</u> those organizations initiate a request, <u>THEN</u> 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.

<u>Note</u>

In fast breaking events, the ED may give verbal authorization instead of written approval to release the statement.

- d. Review and approve news statements prior to being released to the media.
- 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 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> go to Step 5.2.7.

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5.2.20 <u>WHEN</u> 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. <u>IF</u> the event is an ENTRY INTO RECOVERY, <u>THEN</u> 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. <u>IF</u> the event is an emergency class TERMINATION, <u>THEN</u> 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 <u>WHEN</u> notified or upon hearing the Event announcement (except when a Security Event is in progress), report immediately to the SM in the Control Room.

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- 5.3.2 <u>WHEN</u> directed by the Emergency Director/Shift Manager to perform event notifications, go to EPIP-AD-07.
- 5.3.3 <u>IF</u> an Emergency Response Facility (ERF) Communicator-Control Room (CR) is <u>NOT</u> available, <u>THEN</u> 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 <u>WHEN</u> directly notified, paged by radio-pager, or hearing the event announcement:
 - a. Report to the Control Room immediately.
 - b. <u>IF</u> the ERF Communicator-CR has been designated, <u>THEN</u> until released, assist the designated ERF Communicator-CR.
 - c. <u>IF</u> an ERF Communicator-CR has <u>NOT</u> been designated, <u>THEN</u> 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.

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- 5.4.4 <u>IF</u> there is an event: DECLARATION, ESCALATION, DE-ESCALATION, CHANGE IN PAR, TERMINATION, <u>OR</u> ENTRY INTO RECOVERY, <u>AND</u> directed by the SM/ED, go to EPIP-AD-07 <u>OR</u> EPIP-EOF-08 <u>AND</u> make the appropriate event notifications.
- 5.4.5 Review the need for the Notifier or additional communicator support.
- 5.4.6 <u>IF</u> additional Communicator support is needed, <u>THEN</u> contact the Technical Support Center Director
- 5.4.7 <u>IF</u> State and County notifications and ERO notifications are complete, or if a Notifier is implementing them, <u>THEN</u> 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 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> go to Step 5.4.4.
- 5.4.11 <u>WHEN</u> 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 <u>WHEN</u> directly notified, paged by radio-pager, or hearing the event announcement:
 - a. Report to the Control Room immediately.
 - b. <u>IF</u> a Control Room Support Person has been designated, <u>THEN</u> until released, assist the Control Room Support Person, as instructed.
 - c. <u>IF</u> a Control Room Support Person has <u>NOT</u> been designated, <u>THEN</u> 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).

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- 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 <u>IF</u> additional Support Personnel are needed, <u>THEN</u> 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:

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.

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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 <u>OR</u> 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.

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5.7 Event Operations Director (EOD) shall:

- 5.7.1 <u>WHEN</u> notified that an Emergency has been declared:
 - a. Report to the Control Room.
 - b. <u>IF</u> an Event Operations Director has been designated, <u>THEN</u> until released,
 - If appropriate, plan a shift relief per EPIP-AD-05, AND
 - Assist the designated Event Operations Director.
 - c. <u>IF</u> an Event Operations Director has <u>NOT</u> been designated, <u>THEN</u> 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.

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- 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 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> go to Step 5.7.5.

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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 <u>WHEN</u> notified that an Emergency has been declared:
 - a. Report to the Technical Support Center (TSC).
 - b. <u>IF</u> a Radiation Protection Director has been designated, <u>THEN</u> until released,
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated RPD.
 - c. <u>IF</u> a Radiation Protection Director has <u>NOT</u> been designated, <u>THEN</u> 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 If needed, assign an HP Tech or Chem Tech to the HPN phone.
- 5.8.11 Verify that emergency radiation controls are being implemented (EPIP-AD-11).

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5.8.12 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.

- 5.8.13 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
- 5.8.14 <u>IF</u> dose calculation capability is <u>NOT</u> available in the EOF <u>AND</u> a radioactive release has occurred or there is the potential for a release, <u>THEN</u>:
 - a. Direct the staff to perform dose projections (EPIP-ENV-03C, "Dose Projection Using RASCAL 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.
- 5.8.15 Monitor plant conditions for indications of radioactive iodine and with concurrence of the ED make KI available, if appropriate (EPIP-AD-18).
- 5.8.16 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.

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

<u>Note</u>

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

- 5.8.17 <u>IF</u> there are injuries or vehicle accidents associated with plant personnel or contractors, <u>THEN</u> contact the appropriate support agencies.
 - a. <u>IF</u> the injury is a "Medical Attention (Critical) Injury" or a vehicle accident with injuries (see NAD-02.09 for definition of critical injuries), <u>THEN</u>:
 - 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. <u>IF</u> the injury is on-site, <u>THEN</u>:
 - 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.

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- 5. <u>IF</u> the accident potentially involves radioactive contamination, <u>THEN</u>:
 - 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. <u>IF</u> the Injury is a "Medical Attention (Non-critical) Injury," <u>THEN:</u>

<u>Note</u>

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. <u>IF</u> there are contaminated injuries, <u>THEN</u> 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.

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- 5.8.18 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).
- 5.8.19 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.
- 5.8.20 If appropriate for long term accident support, then coordinate with the ALD to establish contract support.
- 5.8.21 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.8.22 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.8.5.
- 5.8.23 <u>WHEN</u> 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.

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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, <u>UNTIL</u> 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. <u>IF</u> a Technical Support Center Director has <u>NOT</u> been designated, <u>THEN</u> 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

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- 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 <u>IF</u> Final Conditions (Section 6.0) have <u>NOT</u> been met, <u>THEN</u> go to Step 5.9.5.

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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. <u>IF</u> a Support Activities Director has been designated, <u>THEN</u> until released,
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated SAD.
 - c. <u>IF</u> a Support Activities Director has <u>NOT</u> been designated, <u>THEN</u> 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.

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- 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, <u>UNTIL</u> released:
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated SPD.
 - c. <u>IF</u> a Site Protection Director has <u>NOT</u> been designated, <u>THEN</u> 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.

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- 5.11.5 <u>IF</u> Search and Rescue is required due to accountability results, <u>THEN</u> 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 <u>IF</u> hazards identified by the RPD or the Control Room warrant it, <u>THEN</u> 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.

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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 EPIPs.

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 Software

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- 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

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- 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 OA Records

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

8.1.2 Non-QA Records

None

Note: All blanks are not required to be completed.

(cir	cle):	Unusual Event	Alert Si	te Area Emergency	General E	mergency
1.	Initia	ating Events:				
				tion:		
2.				mplementation and i		
		actor Status (circle	•	•	_	Improving
		•	•	ble Degradi	_	, ,
Saf	ety Sys	stem operation / p	roblems: _			
Saf	Fission Fuel	on Product Barrier Cladding:	roblems: _	Potential Loss	Lost _	
Saf	Fission Fuel Prim	on Product Barrier Cladding: eary Coolant:	Intact	Potential Loss Potential Loss	Lost _	
	Fission Fuel Prim	on Product Barrier Cladding:	Intact Intact Intact	Potential Loss	Lost _	
Saf	Fission Fuel Prim Contact Safe	on Product Barrier Cladding: ary Coolant:	Intact Intact Intact	Potential Loss Potential Loss	Lost _	

3.	Control Room Support Pri	iorities for Maintenance or assista	nce needed:	
4.	Radiological conditions	Release in progress (circle):	YES	N
On-s	site Protective Actions	•		
Off-s	ite Protective Actions recor	nmended (only for a General Eme	ergency classi	ficatio
Off-s	ite Assistance Requests			
Off-s	ite Notifications	Last Notification	on Time:	
Off-s		Last Notification		

S	Status of ERO activation
-	
5	Status of Plant Accountability:
_	
S	Status of outside agency mobilization
-	

Obtain a copy of all Event Notifications to State & Counties

(HELP GUIDE)

A. Emergency Classification Status

- 1. Initiating Events and EALs exceeded:
 - Cause, history, and initiating events leading to emergency declaration
 - EALs exceeded
- 2. Status of Emergency Procedure Implementation and Mitigating Actions
 - Status of progress in emergency procedures
 - Corrective actions taken
- B. Plant/Reactor Status

Condition / stability of reactor and plant conditions improving or declining

- 1. Fission Product Barrier and Safety System Status
 - Fission Product Barrier Status (Fuel, RCS, Containment)
 - Safety System alignments and status (flow rates, etc.)
- 2. Evolutions in Progress
 - Control Room activities
 - In plant activities (AOs, I&C, Mechanics)
- 3. Radiological Conditions
 - Known in plant conditions
 - Known releases and duration
- C. On-Site Protective Actions
 - Existing personnel hazards
 - Evacuations (local, site) and status of accountability or assembly
 - KI Administration (status)

(HELP GUIDE)

- D. Off-Site Protective Actions
 - Status of Dose Assessment activities
 - PARs made to State/County Agencies
- E. Off-Site Assistance Request
 - Fire, rescue squad, and law enforcement assistance requested
- F. Off-Site Notifications
 - Status of notifications made to:
 - State and Counties
 - NRC
 - INPO
 - ANI
 - Any others
- G. Status of ERO Activation
 - Minimum staffing positions not reporting in to Automated Notification System
- H. Status of Plant Accountability
 - Security actions taken
 - Any missing individuals.
- I. Status of Outside Agency Mobilization
 - Any Reports that the State and Counties, NRC, etc., are activating
 - Requests from State/Counties/NRC, etc.
 - Time/Content of any News Releases
- J. Control Room Support Priorities for Maintenance or assistance needed
 - Key work items to support the Control Room
 - Equipment needed returned to service
 - Additional assistance needed to meet Control Room needs

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Reviewed By	Richard Johnson		Approv	ed By Jerrie Morl	ino	
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		Tempor	proval Of ary s Required	□ Yes ☑ 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 <u>IF</u> approached by the media during a declared emergency, <u>THEN</u> 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 This is a "Continuous Use" procedure with steps performed in sequence.

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 <u>UNTIL</u> 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 <u>IF</u> an event is terminated prior to the initial notification of the event, <u>THEN</u> the off-site notification of the declaration of the event <u>AND</u> 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) by SAS is not required in this circumstance.
- 3.4 <u>IF</u> an emergency class escalation, de-escalation, change in PAR, termination, or entry into recovery occurs during the notification <u>AND</u> prior to transfer of off-site notifications to the TSC or EOF, <u>THEN</u> disregard any remaining steps and return to Step 5.1. Begin the appropriate actions and notifications for the new emergency level.

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Initial Conditions 4.0

- 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.

5.1	Notify the	State and	County and	FRO of the	Event
J.1	TAOULA INC	State and	County and	LING OF THE	

5.1	Notif	fy the State and County and ERO of the Event	
			Check
	5.1.1	Verify the SM/ED has contacted SAS to provide direction on activation of ERO in accordance with Attachment B of EPIP-AD-07, "ERO Event Notification."	
	5.1.2	Verify that any "Event Notice," Form EPIPF-AD-07-01, received from the SM/ED or ERM has their approval signature, date, and time.	
	5.1.3	Complete block 12 of Form EPIPF-AD-07-01.	
	5.1.4	Complete Attachment A of EPIP-AD-07, "State and County Event Notification."	·····
	<u>Note</u>		
		5.2 and 5.3 are <u>NOT</u> to be performed by the ERF Communicator-CR, if another member is available to perform these steps.	
5.2	FAX	Event Notice	
	5.2.1	Obtain fax cover sheet, Form EPIPF-EOF-08-03, "Fax for Emergency Declaration or Status Updates."	
	5.2.2	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."	

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5.2	2.3 Contact the Point Beach Duty Shift Manager at (920) 755-6247 and notify him that an "Event Notice" has been faxed to him.	<u>Check</u>
5.3	Return Form EPIPF-AD-07-01 to the SM/ED or ERM who approved the "Event Notice."	
5.4	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 KNPP 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-AD-07, Attachment B, ERO Event Notification
- 7.7 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.8 EPIP-EOF-08, Continuing Emergency Notifications
- 7.9 Form EPIPF-AD-07-01, Event Notice (Nuclear Accident Reporting System Form (NARS))
- 7.10 Form EPIPF-AD-07-03, FAX Event Notice
- 7.11 Form EPIPF-EOF-08-03, Fax for Emergency Declaration or Status Updates

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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
- Attachment B, ERO Event Notification
- Form EPIPF-AD-07-03, FAX Event Notice

8.1.2 Non-QA Records

None

STATE AND COUNTY EVENT NOTIFICATION (Page 1 of 3)

Dat	te and	Time:		<u>Check</u>			
1.	Veri	fy the bell switch for the Government verification pho-	ne at your station is ON.				
2.	Pick	up the Dial Select phone and verify the line is clear.					
	a. <u>IF</u> someone is using the Dial Select line, <u>THEN</u> state that you have a " PRIORITY 2 " notification. They will clear the line unless they have a " PRIORITY 1 " call.						
	b.	b. <u>IF</u> someone states they have a " PRIORITY 1 " conversation, <u>THEN</u> 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.	<u>IF</u> the Dial Select system is not operating, <u>THEN</u> go Method, Commercial Phone).	to Step 9 (Using Secondary				
	her Woond.	arning Center I or Warning Center II may respond. Bo	th are <u>NOT</u> required to				
<u>IF</u> (ın age	ncy does not respond, <u>THEN</u> press # to cancel the ring	ging.				
4.	<u>WH</u>	EN each party acknowledges:					
	a.	Answer by stating: "This is the Kewaunee Nuclear for a Nuclear Accident Reporting System (NARS)					
	b.	Record the time each agency responds on top of Forn form).	n EPIPF-AD-07-01 (NARS				
	c.	After all agencies have answered press the # key to ca	ancel the ringing.				
		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				
	• IF after five (5) rings an agency has not answered, <u>THEN</u> press the individual's Dial Select number from the table below.						
		• WAIT up to five (5) more rings, THEN press the	"#" key to cancel ringing.				
		• IF unable to contact a specific agency, <u>THEN</u> con agencies on the line.					
5.		the message on Form EPIPF-AD-07-01 text aloud, SI IBERATELY, using number and letter designations (R					
6.	Say: "State Warning Center, please read back this message to verify						

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accuracy." (Pause to allow message to be read back.)

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		<u>Check</u>
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.	<u>IF</u> any agencies did not respond to the Dial Select, <u>THEN</u> 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.

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						<u>Check</u>
	<u>Not</u> WH	-	backs you may	continue with other steps	in EPIP-AD-07.	
11.	1. Monitor government verification line for Call Backs.					
	a.	WHEN calls are receirecord time of call, ca		or Local Emergency Gov phone number.	ernment Officials,	
			<u>Time</u>	Name	Contact Phone #	
		State of Wisconsin (Duty Officer)				
		Manitowoc County (Emerg. Mgnt. Dir.)				
		Kewaunee County (Emerg. Gov. Dir.)				
	b.	within 45 minutes from	n the time reco	call backs from each of the orded for Roll-Call on For cess for those officials by	m EPIPF-AD-07-01,	
	c.		ncy Governme	is requested, <u>THEN</u> trans nt Officials or the State R is designee.		
12.	Infor	m SM/ED/ERM when	all verification	callbacks have been recei	ved.	
13.	Retu	rn to procedure Step 5.2	2.		_	

ERO EVENT NOTIFICATION

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	DA'	TE:		<u>Check</u>
	<u>Not</u> Any	_	SC PBX telephone extension can be used to activate the pagers.	
	mes	– EN d sage	irected, activate the radio pager code the SM/ED selected in Section 2 and the code selected in Section 3. If the selection in Section 4 contains two pager codes, arough 6 must be performed twice, once for each code.	
	<u>Not</u> <u>IF</u> th	he Ki	NPP paging system is inoperable or unavailable, <u>THEN</u> go to Step 8. ext. "5213" on any WPSC PBX Telephone (extension xxxx).	
	2.	<u>WH</u>	EN the phone answers and responds with a single (1) beep, dial the pager access code cted below (the SM/ED must check one of the options below).	
		o o	"9233" - ALERT or HIGHER EVENT (All emergency pager holders), "9211" AND "9222"- UNUSUAL EVENT (Directors and Select Staff) "9244" AND "9255" - CREDIBLE SECURITY THREAT	
•	Not	(the <u>e</u>	EN the phone responds with three (3) beeps, dial the message code selected below SM/ED must check one of the options below). s as found in envelopes.	
	Use		"77777" - ALERT	
		0	"88888" - SITE EMERGENCY	
			"99999" - GENERAL EMERGENCY	
		_	"44666" - CREDIBLE SECURITY THREAT - UNUSUAL EVENT	
			"44777" - CREDIBLE SECURITY THREAT - ALERT "66666" - UNUSUAL EVENT	
			"44444" - TERMINATION OR RECOVERY	

ERO EVENT NOTIFICATION

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			<u>Check</u>			
4.	Press	s the "#" key. WHEN the phone responds with five (5) beeps, hang up.				
5.	<u>IF</u> an	nother pager access code is to be activated, <u>THEN</u> return to Step 1.				
6.	6. Verify that the ERO control pager in the Control Room (or any ERO member's pager) has activated and displays the message within 3-4 minutes.					
7.	<u>IF</u> th	e PBX phone system is inoperable, <u>THEN</u> :				
		Dial "1-920-617-5213" from a Kewaunee (388-xxxx) or other non Green Bay external telephone company exchange line, <u>OR</u>				
		Dial "617-5213" from any Green Bay (433-xxxx, 617-xxxx, etc.) external telephone company exchange, <u>OR</u>				
	•	Dial "9-1-920-617-5213" from a Centrex (431-xxxx) exchange located in the EOF.				
	_ follov	ving steps are to be used if the radio paging system is inoperable or significantly outside of normal working hours.				
	aison	should not accept responsibility for the ERO Call Tree unless they have immediate the KPB Emergency Telephone Directory.				
	Liais	on does not accept the responsibility for an ERO Call Tree (Part "A" and/or Part <u>EN</u> the communicators should implement that part of the Call Tree themselves.				
8.		oblems are encountered with the KNPP paging system, <u>THEN</u> use the alternate ERO ication method.				
	a.	Call the State or County Liaisons listed in the Emergency Telephone Directory tab "KNPP ERO Call List," ETD 01A, until two liaisons accept the ERO Call Tree responsibility.				
	b.	Inform the first Liaison accepting the ERO Call Tree Task that a(n) (select one) Unusual Event, Alert, Site Emergency, General Emergency, or Credible Security Threat, was declared at (time) and the ERO Call Tree Part "A" in the Emergency Telephone Directory tab "KNPP ERO Call List," ETD 01A, should be activated.				
	c.	Inform the second Liaison accepting the ERO Call Tree Task that a(n) (select one) Unusual Event, Alert, Site Emergency, General Emergency, or Credible Security Threat, was declared at (time) and the ERO Call Tree Part "B" in the Emergency Telephone Directory tab "KNPP ERO Call List," ETD 01A and tab "KPB ERO Call List," ETD 01C, should be activated.				

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Reviewed By	Brent Doering		_ Approv	ed By	errie Morlino	
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		☐ Yes ☑ No	SRO Approval Of Temporary Changes Require	□ 1C3

1.0 Purpose

1.1 This procedure provides instruction for the Environmental Monitoring Group for formulating and recommending timely Protective Action Recommendations (PARs) to the Emergency Response Manager.

2.0 General Notes

- 2.1 PARs are developed using plant data, field data and off-site dose projections.
- 2.2 Collect data using the following techniques in the order presented.
 - 2.2.1 Project the Total Effective Dose Equivalent (TEDE) based on information provided by available plant sources including meteorological and radiological release data.
 - 2.2.2 Determine the boundaries of a radioactive spill or plume, and the total area affected.
 - 2.2.3 Collect samples to determine the isotopic makeup of the plume or spill.
 - 2.2.4 Sampling area for the Environmental Monitoring Teams (EMTs) normally extends from the protected area fence to a 10 mile radius of the plant. However, if dose projections or field readings indicate doses ≥ 1 rem TEDE or ≥ 5 rem thyroid to any population outside the 10 mile radius of the plant then sampling should continue beyond the 10 mile radius. Areas monitored and sampled by the EMTs may include areas such as the access road, parking lot(s), training facilities or other locations on-site but outside the protected area fence as needed.

3.0 Precautions and Limitations

3.1 EMTs shall <u>NOT</u> enter areas where projected or measured external radiation dose rates exceed 1 R/hr without receiving specific directions to enter the area, as approved by the Environmental Protection Director (EPD) or Radiological Protection Director (RPD).

4.0 Initial Conditions

- 4.1 This procedure may be implemented at the declaration of an Unusual Event.
- 4.2 Activate the EMTs when an Alert, Site Emergency, General Emergency is declared.

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5.0 Procedure

- 5.1 Environmental Protection Director (EPD) responsibilities:
 - 5.1.1 <u>IF</u> an Unusual Event has been declared, <u>THEN</u> implement EPIP-EOF-03, "EOF Staff Action for Unusual Event."
 - 5.1.2 <u>IF</u> an Alert, Site Area, or General Emergency has been declared, <u>THEN</u> implement EPIP-EOF-04, "EOF Staff Action for Alert or Higher."
- 5.2 The Dose Projection Calculator (DPC) shall:
 - 5.2.1 Report to the EPD upon arrival at the Emergency Operations Facility (EOF).
 - 5.2.2 Assist the EPD in the activation of the Environmental Dispatch Area using Form EPIPF-ENV-01-01, "Environmental Dispatch Area Activation Checklist."
 - 5.2.3 During the initial facility activation, complete applicable portions of Form EPIPF-EOF-08-06, "Radiological Status Report," using the following resources:
 - 5.2.3.1 Information posted on the status boards
 - 5.2.3.2 Meteorological data from the following sources:
 - a. PPCS/SPDS Computer
 - b. Green Bay National Weather Service
 - c. Point Beach Nuclear Plant
 - 5.2.3.3 Obtain current plant status and off-site radiological release information from the following:
 - a. Engineering/Licensing Coordinator
 - EOF status boards
 - c. Radiological Analysis Facility (RAF)
 - d. PPCS/SPDS Computer
 - 5.2.4 Provide the information recorded on Form EPIPF-EOF-08-06 to the following personnel:
 - a. Environmental Protection Director (EPD)
 - b. State Radiological Coordinator Liaison (SRCL)
 - c. Environmental Monitoring Team Coordinator (EMTCD)

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- 5.2.5 Update the applicable portions of the form at least every hour (more frequently if conditions are changing) during the first 4 hours of a declared emergency.
- 5.2.6 After the first 4 hours, update the applicable portions of the form as conditions change.
- 5.2.7 As directed by the EPD, perform off-site radiological dose projections in accordance with EPIP-ENV-03C, "Dose Projection Using RASCAL Software."
- 5.2.8 Compare the off-site radiological dose projection results with the following:
 - a. Off-site radiological dose projection results obtained by the RAF
 - b. EMT field data
- 5.2.9 Report the dose projection results and the comparison to the EPD and SRCL.
- 5.2.10 Assist the EPD and EMTCD as necessary.
- 5.2.11 Continue dose assessment activities as directed by the EPD.
- 5.3 The Environmental Monitoring Team Coordinator (EMTCD) shall:
 - 5.3.1 Upon arrival at the Emergency Operations Facility (EOF), report to the EPD.
 - Assist EPD in the activation of the Environmental Dispatch area using Form EPIPF-ENV-01-01, "Environmental Dispatch Area Activation Checklist."
 - 5.3.3 Obtain meteorological and plant status information from the Dose Projection Calculator (DPC) <u>AND</u> complete Form EPIPF-ENV-01-03, "Meteorological and Plant Status Data."
 - 5.3.3.1 <u>IF</u> all of the following meteorological conditions exist, <u>THEN</u> the potential for a lake breeze effect exists.
 - a. KNPP or Point Beach Nuclear Plant (PBNP) wind direction is between 020 and 170 degrees, AND
 - b. Green Bay National Weather Service or PBNP Inland Tower wind direction is between 210 and 330 degrees, AND
 - c. The time is between 0700 and 2000.
 - 5.3.3.2 <u>IF</u> a potential for a lake breeze effect exists, <u>THEN</u> direct EMTs to verify the plume has <u>NOT</u> traveled in a northern or southern direction along the lakeshore.

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- 5.3.4 Draw the projected plume on the Emergency Planning Zone (EPZ) grid map located in the Environmental Dispatch Area using the following:
 - 5.3.4.1 Wind direction as the projected plume centerline
 - 5.3.4.2 The projected plume boundaries (based on the stability class) as the lateral edges
- 5.3.5 Direct the Environmental Monitoring Team Communicator (EMTCM) to establish and maintain communications with the EMTs.
- 5.3.6 With EPD concurrence, develop a strategy and EMT orders for the following:
 - a. Plume tracking
 - b. Sample collection
 - c. Sample analysis
- 5.3.7 Relay the strategy to the EMTs through the EMTCM.
- 5.3.8 Obtain a copy of Form EPIPF-ENV-01-02, "EMT Status," from the EMTCM.
 - Team Designation and team members' names
 - Standing Order implemented by each team
 - Current Annual Dose (TEDE)
 - Date and Time Activated
 - Team Status (EMT activities in progress including order being implemented by each team, team location, etc.)
- 5.3.9 Direct the EMTCM to provide the EMTs with initial and updated meteorological and plant status information using EPIPF-ENV-01-03, "Meteorological and Plant Status Data."

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Note

Environmental Monitoring Teams (EMTs) should <u>NOT</u> enter areas where projected or measured external radiation dose rates exceed 1 R/hr without specific direction from the EPD or RPD.

<u>Note</u>

EMT members are instructed to report exposure every hour or when 100 mrem has been received.

- 5.3.10 Track the cumulative radiation exposure for each EMT member as follows:
 - 5.3.10.1 Obtain deep dose equivalent (DDE) from EMTs every hour.
 - 5.3.10.2 Add the DDE to the current annual TEDE.
 - 5.3.10.3 Direct the EMTCM to periodically report the sum of the current annual TEDE and cumulative DDE to the EMT members.
- 5.3.11 <u>IF</u> the sum of the current annual TEDE and cumulative DDE approaches administrative limits, <u>THEN</u> consider authorization for increased radiation exposure in accordance with NAD-01.11, "Dosimetry and Personnel Monitoring."
- 5.3.12 <u>IF</u> radiological conditions are such that EMTs could exceed 10CFR20 limits <u>THEN</u> consider emergency exposure in accordance with EPIP-AD-11, "Emergency Radiation Controls."
- 5.3.13 EMTs should verify adequate supply available and wear radiological protective clothing when directed by the EMT Coordinator.
- 5.3.14 Ensure that all data received from the EMTs is provided to the EPD and DPC in a timely manner.
- 5.3.15 Plot EMT field data on the EPZ grid map in the Environmental Dispatch Area.
- 5.3.16 Continue monitoring team activities as directed by the EPD.
- 5.4 Environmental Monitoring Team Communicator (EMTCM) duties:
 - 5.4.1 Upon arrival at the EOF, report to the EMTCD.
 - 5.4.2 Assist in the activation of the Environmental Dispatch Area using Form EPIPF-ENV-01-01, "Environmental Dispatch Area Activation Checklist."
 - 5.4.3 Establish communications with each activated EMT.

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- 5.4.4 Obtain the information required on EPIP-ENV-01-02, "EMT Status," from the EMTs AND forward the form to the EMTCD.
- 5.4.5 Transmit orders and other information from the EMTCD to the EMTs using the following:
 - a. Fax
 - b. Cellular phone
 - c. Radio
- 5.4.6 Record information from the EMTs on form EPIPF-ENV-01-04, "EMT Orders/Field Data," and forward the form to the EMTCD.
- 5.4.7 Perform the responsibilities of the EMTCM as long as the EMTs are activated.
- 5.5 The Environmental Monitoring Team (EMT) members shall:
 - 5.5.1 Activate EMTs in accordance with "Environmental Monitoring Team Activation," EPIP-ENV-02.
 - 5.5.2 Implement EPIP-ENV-04D, "Plume Tracking for Environmental Monitoring Teams."

6.0 Final Conditions

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 KNPP Emergency Plan (Appendix D: Letters of Agreement)
- 7.2 EPIP-AD-11, Emergency Radiation Controls
- 7.3 EPIP-ENV-02, Environmental Monitoring Team Activation
- 7.4 EPIP-ENV-03C, Dose Projection Using RASCAL Software
- 7.5 EPIP-ENV-04D, Plume Tracking for Environmental Monitoring Teams
- 7.6 EPIP-EOF-03, EOF Staff Action for Unusual Event
- 7.7 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.8 NAD-01.11, Dosimetry and Personnel Monitoring

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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 Dispatch Area Activation Checklist, Form EPIPF-ENV-01-01
- EMT Status, Form EPIPF-ENV-01-02
- Meteorological and Plant Status Data, Form EPIPF-ENV-01-03
- EMT Orders/Field Data, Form EPIPF-ENV-01-04
- Radiological Status Report, Form EPIPF-EOF-08-06

8.1.2 Non-QA Records

None

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Emergenc	y Plan Implementi	ing Procedure	Date	JU	TL 31 2003	Page 1 of 2	
Reviewed By	Brent Doering		Approv	ed By	errie Morlino	<u></u>	
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		☐ Yes ☑ No	SRO Approval O Temporary Changes Require	_ 103	_

1.0 Purpose

1.1 This procedure provides instruction for timely activation of the Environmental Monitoring Teams (EMTs) at the Site Boundary Facility (SBF).

2.0 General Notes

2.1 None

3.0 Precautions and Limitations

Note

Keys for all SBF doors and cabinets are kept in the Radiation Protection Office (RPO) and will be brought to the facility by the SBF Coordinator when he responds. Keys for the front door only are maintained in security.

3.1 <u>IF</u> the SBF is locked, <u>THEN</u> obtain the key from the Security Building.

4.0 Initial Conditions

- 4.1 This procedure may be implemented at the declaration of an Unusual Event.
- 4.2 The EMTs shall be activated when an emergency has been classified as an Alert, a Site Emergency, or General Emergency.

5.0 Procedure

5.1 Activation Leader

- 5.1.1 The first EMT member arriving at the SBF will assume the responsibility of the Activation Leader and shall complete the following steps:
- 5.1.2 Place his/her name on the EMT status board at the SBF.
- 5.1.3 If appropriate, then relinquish the duty of activation leader to a more senior EMT member upon his/her arrival and note the turnover on the EMT status board.

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- 5.1.4 Assign the EMT personnel to teams as they arrive at the SBF.
 - a. Staff each team with a minimum of two members, beginning with Team A.
 - b. <u>IF</u> manpower is sufficient, <u>THEN</u> assign 3 members to each team.
 - c. <u>IF</u> insufficient numbers of personnel are available, <u>THEN</u> the Activation Leader may assign him/herself to one of the teams.
 - d. Record EMT assignments on the EMT status board at the SBF.
- 5.1.5 Direct each team to complete Form EPIPF-ENV-02-01, "EMT Activation Checklist."
- 5.1.7 Report the names of any remaining EMT members not assigned to a team to the Environmental Monitoring Team Coordinator (EMTCd) or the Radiological Analysis Facility (RAF).
- 5.1.8 <u>IF</u> problems with the instruments are encountered, <u>THEN</u> contact the SBF Coordinator, Emergency Operations Facility (EOF), or Radiological Assessment Facility (RAF) for assistance.
- 5.1.9 <u>IF</u> problems with the communications equipment are encountered, <u>THEN</u> contact the Environmental Monitoring Team Coordinator (EMTCd).
- 5.1.10 <u>WHEN</u> an EMTeam is activated, <u>THEN</u> they should begin performance of EPIP-ENV-04D.

6.0 Final Conditions

6.1 This procedure is complete when all required EMTs are activated and operational.

7.0 References

7.5 EPIP-ENV-04D, Plume Tracking for Environmental Monitoring Teams

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

EMT Activation Checklist, Form EPIPF-ENV-02-01

8.1.2 Non-QA Records

None

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		Date	Л	л. 31 2003	Pag	e 1 of 6	
Reviewed By	Michael Gagnon		Approv	ed By	Jerrie Morlino		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approval Temporary Changes Requi		☐ Yes ☑ No

1.0 Purpose

1.1 This procedure provides instruction for using portable survey instruments used by the Environmental Monitoring Teams (EMTs).

2.0 General Notes

2.1 Environmental Monitoring Teams are responsible for following this procedure when using portable survey instruments.

3.0 Precautions and Limitations

- 3.1 Do not wrap, in plastic, the detector of any instrument that can be used to measure Beta radiation. Wrapping the detector in plastic during operation may shield Beta radiation. Instruments and their detectors may be placed in a plastic bag to prevent contamination while being transported.
- 3.2 Each instrument and its attached detector have been calibrated as a set. **<u>DO NOT</u>** interchange instruments and detectors unless authorized by the Radiation Protection Group.

 Interchanging instruments and detectors invalidates the instrument/detector calibration.
- 3.3 EMTs should verify an adequate supply available and wear protective clothing when directed by the EMT Coordinator based on known or suspected contamination.
- 3.4 All of the radiological sampling instruments are electronic devices, therefore, care should be taken to keep them dry. Moisture may make them perform erratically and may result in shorts that may pose personal injury potential. (OTH 8801)

4.0 Initial Conditions

4.1 This procedure is used during a declared plant emergency by the EMTs when operating portable survey instruments.

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5.0 Procedure

Note

Preoperational instrument checks are documented on Form EPIPF-ENV-02-01, "EMT Activation Checklist."

Note

<u>IF</u> any instrument fails a preoperational check, <u>THEN</u> obtain a spare instrument <u>OR</u> contact the RPO/RAF for assistance.

- 5.1 Prior to using any portable survey instruments, perform a preoperational instrument check which consists of:
 - Inspecting the instrument for deterioration or defect (frayed electrical connections, broken meter face, etc.).
 - Verifying the instrument has been calibrated within the due date listed on the instrument calibration sticker.
 - Verifying the batteries are satisfactory.
 - Verify/adjust zero adjustment (as applicable)
 - Verifying the instrument response to a check source is satisfactory.

5.2 <u>Ion Chamber Use</u>

- 5.2.1 Turn the function switch to check the battery(s).
 - 5.2.1.1 <u>IF</u> the battery(s) level indicates satisfactory, <u>THEN</u> use the instrument. Otherwise replace the battery(s) and recheck battery level.

Note

The zero setting may be checked in any radiation field. For ALARA, this should be done in a low background area.

- 5.2.2 <u>IF</u> the instrument has a zero knob, <u>THEN</u> perform the following:
 - Turn the function switch to the ZERO position.
 - Check that the meter reads zero. If not, set it to zero with the ZERO knob.
- 5.2.3 Perform a source check of the instrument and ensure the meter reads within ±20% of the check source value as specified on the calibration sticker.

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- 5.2.4 Set the function switch to the desired range of operation. The switch position selected is usually the full scale reading of that range.
 - 5.2.4.1 The effective center of the ion chamber is usually marked by dimples at the front and sides of the instrument case. Otherwise the center can be found by looking at it with the window open.
 - 5.2.4.2 Do not expose the instrument to fields of radiation significantly above full scale for the range selected or damage may result.
- 5.2.5 When measuring Beta, open the sliding Beta shield on the bottom of the case and face the bottom of the instrument toward the radiation source. Multiply the Beta Correction Factor value listed on the calibration sticker by the difference of window open minus window closed readings to determine the Beta dose rate in mRAD/hr.
 - 5.2.5.1 To open or close the shield, depress the friction release button and manually move the slide, or let it fall due to gravity. When the shield is open, protect the thin mylar face against puncture damage.
- 5.2.6 Perform a radiation survey.

Note

Survey readings are normally taken with the Beta window closed (Gamma only).

Note

A high Beta/Gamma ratio at 1 meter indicates the presence of the plume at ground level (an air sample may be warranted).

Note

A high Beta/Gamma ratio at 3 inches indicates ground deposition (environmental sampling may be warranted).

Note

No large Beta/Gamma ratio indicates the plume may be overhead, weak, or you are not in the plume.

- a. Determine the Gamma radiation level.
 - 1. Hold the detector, with the Beta window closed, approximately 1 meter above the ground.

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- b. Determine the corrected Beta radiation level.
 - 1. With the Beta window open, hold the survey meter approximately 1 meter above ground to determine the Beta/Gamma reading.
 - 2. Subtract the reading taken in Step 5.2.6.a.1 from the reading taken in Step 5.2.6.b.1 to obtain the uncorrected Beta reading.
 - (Uncorrected Beta reading = Beta/Gamma reading Gamma reading)
 - 3. Multiply the uncorrected Beta reading obtained in Step 5.2.6.b.2 by the Beta Correction Factor (BCF) listed on the instrument calibration sticker to obtain the corrected Beta radiation level.

(Corrected Beta radiation level = uncorrected Beta reading x BCF)

Note

Higher corrected Beta radiation levels at 3"as compared to 1 meter indicate the presence of ground deposition.

- 5.2.7 Determine the presence of ground deposition.
 - a. Perform Steps 5.2.6.a and 5.2.6.b holding the detector at 1 meter <u>AND</u> approximately 3" above the ground.
 - b. Compare the corrected Beta reading taken at 3" to the reading taken at 1 meter.
- 5.3 Operate the ASP-1 with the HP-260 Detector
 - 5.3.1 Perform a battery check.
 - a. Place the selector switch to the **BATTERY CHECK** position.
 - b. Confirm the meter indicates within the "BATT OK" area.
 - 1. <u>IF NOT OK, THEN</u> the batteries need to be replaced.
 - 5.3.2 Perform an instrument response to a check source.

Note

Readings are sensitive to the check source/sample position on the detector. The instrument response to a check source reading should be within $\pm 20\%$ of the required check source reading written on the calibration sticker.

a. Place the **HP-260** detector directly on contact with the check source.

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- b. Place the **SELECTOR** switch to a setting that gives an upscale reading, approximately 50% of full scale.
- c. Compare the check source reading with the required check source reading on the instrument calibration sticker.
- 5.3.3 Perform a contamination survey.

Note

IF meter readings are erratic, instrument may need to be operated in the slow response mode of operation.

- a. Place the FAST/SLOW instrument response switch to the FAST position.
- b. Hold the detector within ½" from the surface (ground, equipment, personnel, etc.) to be surveyed.
- c. Move the detector over the surface to be surveyed at a rate of approximately 2" per second.
- d. Continuously monitor the meter reading and adjust the **SELECTOR** switch multiplication factor so that the meter reads approximately 50% of full scale.
- e. Multiply the meter reading by the selected multiplication factor to determine the contamination level in counts per minute (CPM).
- 5.3.4 Perform analysis of air sample media.
 - a. Place the FAST/SLOW instrument response switch to the FAST position.
 - b. Place the HP-260 detector directly on contact with either the filter paper or the iodine sampling canister to be monitored.
 - c. Place the selector switch to the lowest range that does not produce an off-scale reading.

<u>Note</u>

IF meter readings are erratic, instrument may need to be operated in the slow response mode of operation.

- d. Obtain the stabilized reading and multiply it by the selected multiplication factor to determine the gross Counts Per Minute (CPM) for the sample.
- e. Subtract the background CPM from the value obtained in Step d above to determine the net CPM.

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.

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7.0 References

- 7.1 HP-06.xxx, Instrument Operating Procedure Series Procedures
- 7.2 INPO 91-014, Rev. 01, Guidelines for Radiological Protection at Nuclear Power Stations, October 1995

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

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Reviewed By	Michael Gagnon		Approv	ed By Jerr	rie Morlino	
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ res T	RO Approval (emporary changes Requi	⊔ Yes

1.0 Purpose

1.1 This procedure provides instruction for the Environmental Monitoring Teams (EMTs) for collecting and analyzing air samples during a declared plant emergency.

2.0 General Notes

2.1 The EMTs shall collect and analyze air samples in accordance with this procedure when directed.

3.0 Precautions and Limitations

- 3.1 Care shall be taken during sample acquisition to prevent sample cross contamination.
- 3.2 To keep personnel exposure ALARA, the air sampler may be left at the sample location to collect the air sample while the EMT waits in a low-dose area.
- 3.3 EMTs shall <u>NOT</u> enter areas where projected or measured external radiation dose rates exceed 1 R/hr without receiving specific directions to enter the area, as approved by the Environmental Protection Director (EPD) or Radiological Protection Director (RPD).
- 3.4 EMTs should always verify adequate supply of and wear protective clothing when directed by the EMT Coordinator based on known or suspected contamination.
- 3.5 EMTs should always wear a reflective vest when performing EMT duties, especially when outside of the vehicle to obtain samples.

4.0 Initial Conditions

4.1 This procedure is used during a declared plant emergency by the EMTs when the teams are directed to collect and/or analyze environmental air samples.

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5.0 Procedure

5.1 Prepare for Air Sample Collection

Note

Whenever practical, perform Steps 5.1.1 and 5.1.2 prior to going to the sample location.

- 5.1.1 Obtain a 2-inch (Gelman) filter paper for particulates, a silver zeolite cartridge for iodine, and a Marinelli beaker for noble gas samples.
- 5.1.2 Prepare the air sampler for sample collection.

Note

The air samplers are stored in a "ready configuration," meaning Steps "a" through "e" are complete. Begin with Step "f." Steps "a" through "e" are included in case complete disassembly and re-assembly are necessary.

- a. Attach the blue cartridge housing (large diameter threaded end) to the air sampler inlet.
- b. Attach one of the gold filter housings to the blue cartridge housing.
- c. Attach the gold coupler to the gold filter housing.
- d. Attach one end of a tygon tube to the gold coupler and the other end to the outlet port of the Marinelli beaker.
- e. Attach one end of a second tygon tube to the inlet port of the Marinelli beaker and the other end to the blue cartridge housing (small gold diameter threaded end).
- f. Verify that the inlet and outlet stop-cocks on the Marinelli beaker are fully open (parallel to flow).
- g. Insert a silver zeolite cartridge into the blue cartridge housing with the arrow on the cartridge pointing in the direction of air flow.
 - 1. <u>IF</u> an air gap exists between the silver zeolite cartridge and the blue cartridge housing, <u>THEN</u> place a cartridge seal ring around the silver zeolite cartridge.
- h. Attach the second gold filter housing to the blue cartridge housing.
- i. With a pen, gently mark an "X" on one side of a particulate filter.
- j. Insert the particulate filter into the second gold filter housing over the vents with the marked "X" side facing out, ensuring that the filter is placed into the filter housing side recessed to accept it.

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- k. Attach the gold filter retaining ring to the gold filter housing.
- 1. Verify that the cartridge and filter housings are sealed tightly so that no air will bypass it during sampling.

5.2 Collect an Air Sample

<u>Note</u>

Air samples are normally collected at locations on the plume centerline. Plume centerline is located at the point where the highest Gamma radiation levels are observed while traversing the plume.

- 5.2.1 Drive to the air sample location.
- 5.2.2 Measure the Gamma radiation levels (dose rates) using the ion chamber with the window closed, while en route to the sample location.

Note

Do not collect an air sample at a location where submersion in the plume is not verified unless specifically instructed to take such action by the Environmental Monitoring Team Coordinator (EMTCd).

- 5.2.3 Verify submersion in the plume by determining the corrected Beta radiation level at the sample location.
 - a. Determine the Gamma level.
 - 1. Hold the detector, with the Beta window closed, approximately 1 meter above the ground.
 - b. Determine the corrected Beta radiation level.
 - 1. With the Beta window open, hold the survey detector approximately 1 meter above ground to determine the Beta/Gamma reading.
 - 2. Subtract the reading taken in Step 5.2.3.a from the reading taken in Step 5.2.3.b.1 to obtain the uncorrected Beta reading.
 - (Uncorrected Beta reading = Beta/Gamma reading Gamma reading)
 - 3. Multiply the uncorrected Beta reading obtained in Step 5.2.3.b.2 by the Beta Correction Factor (BCF) listed on the instrument calibration sticker to obtain the correct Beta radiation level.
 - (Corrected Beta radiation level = uncorrected Beta reading x BCF)
 - c. <u>IF</u> Step 5.2.3.b.3 above results in a positive (greater than zero) corrected Beta radiation level, <u>THEN</u> submersion in the plume is verified.

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- 5.2.4 Record date and time, sample location (grid coordinates), sample type and Gamma radiation level (dose rate) on Form EPIPF-ENV-01-04, EMT Orders/Field Data or on Attachment A of EPIP-ENV-04D, EMT Standing Order SO-1.
- 5.2.5 Operate the air sampler to collect an air sample.
 - a. Verify the number listed on the instrument calibration sticker for particulate, iodine, and noble gas samples is dialed in on the air sampler thumbwheel switches.
 - b. Place the **ON/OFF** power switch in the **ON** position (toggle switch).
 - c. Start the air sampler by pressing the START button (black).

Note

Team should exit the plume while waiting for air sample collection to be completed, to reduce potential for exposure.

d. Record the sample collection start time on a radioactive sample tag.

Note

The air sampler will automatically shut off when 300 liters of air sample is collected.

- e. <u>WHEN</u> the air sampler shuts off, then fully close both the inlet and outlet stop-cocks to the Marinelli beaker (perpendicular to flow).
- f. Record the sample collection end time on the radioactive sample tag.
- g. Record the number from the air sampler LED readout on the radioactive sample tag.
- h. Place the air sampling equipment in a poly bag and place in the EMT vehicle.
- 5.2.6 Go to a location with background Gamma radiation levels (outside the plume) prior to performing sample analysis or labeling and bagging samples (Steps 5.3 and 5.4).
- 5.2.7 <u>IF</u> directed by the EMTCd, <u>THEN</u> collect an alternate gross-air grab sample.
 - a. Don a clean pair of rubber gloves.
 - b. Obtain a water-filled, one liter bottle from the EMT kit.
 - c. Remove the cap and invert the bottle.

Note

Maintain the bottle inverted until the cap is replaced.

d. Allow the water to empty onto the ground.

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- e. Recap the bottle tightly.
- f. Place the bottle in clean poly bag.
- g. Proceed to a location with background Gamma radiation levels.
- h. Complete the radioactive sample tag with the following information:
 - Sample location (to the nearest one-half of a grid coordinate)
 - General area dose rate (mR/hr) at sample location
 - Type of sample (noble gas)
 - Date of sample
 - Time of sample
 - Initials of individual completing the sample tag
- i. Place the radioactive sample tag into the poly bag with the one liter bottle.
- i. Seal the bag.
- k. Using the ion chamber with the window closed, perform an on-contact Gamma radiation dose rate survey of the bag.
- 1. Label the bag with the on-contact Gamma radiation dose rate.

5.3 Analyze an Air Sample

Note

Analyze the sample only when located in an area with background Gamma radiation levels (outside the plume). Don a clean pair of rubber gloves prior to handling samples.

- 5.3.1 Count a silver zeolite cartridge (I-131 sample).
 - a. Using EPIP-ENV-04A, prepare the ASP-1, with HP-260 probe, or equivalent, for a silver zeolite cartridge sample.
 - b. Determine the background CPM for the area where you are doing the analysis.
 - c. Place the HP-260 probe directly on the upstream side of the silver zeolite cartridge.
 - d. Determine the CPM reading for the sample.
 - e. Subtract the background reading from the sample reading to determine the net CPM for the sample. Record this value as the net CPM for the sample.

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- f. Using the graphs in Attachment A, determine the I-131 concentration (μCi/cc) for the sample. Record this value on Form EPIP-ENV-01-04, "EMT Orders/Field Data."
- g. Label and bag the silver zeolite cartridge sample according to Step 5.4 of this procedure.
- 5.3.2 Count a particulate filter (particulate sample).
 - a. Using EPIP-ENV-04A, prepare the ASP-1 with HP-260 probe, or equivalent, for a particulate filter sample.
 - b. Determine the background CPM for the area where you are doing the analysis.
 - c. Place the HP-260 probe directly on the upstream side of the particulate filter.
 - d. Determine the CPM reading for the sample.
 - e. Subtract the background reading from the sample reading to determine the net CPM for the sample. Record this value as the net CPM for the sample.
 - f. Using the graphs in Attachment B, determine the particulate concentration (μCi/cc) for the sample. Record this value on Form EPIP-ENV-01-04, "EMT Orders/Field Data."
 - g. Label and bag the particulate filter sample according to Step 5.4 of this procedure.
- 5.3.3 Analyze a Marinelli beaker noble gas sample.
 - a. Label and bag the Marinelli beaker gas sample according to Step 5.4 of this procedure.
- 5.4 Label and Bag Air Samples

Note

Label and bag the air samples when at a location with background Gamma radiation levels (outside the plume) and use a clean pair of gloves.

- 5.4.1 Place the particulate filter sample in a small poly bag.
- 5.4.2 Place the silver zeolite cartridge sample in the same poly bag with the particular filter.

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- 5.4.3 Complete a radioactive sample tag with the following information:
 - Sample location (to the nearest one-half of a grid coordinate)
 - General area dose rate (mR/hr) at sample location
 - Type of sample(s) (iodine, particulate, and noble gas)
 - Date
 - Time sample started
 - Time sample ended
 - Flow rate of air sampler (from air sampler calibration sticker)
 - Initials of individual completing the sample tag
- 5.4.4 Place the radioactive sample tag in the poly bag with the particulate filter sample and silver zeolite cartridge sample.
- 5.4.5 Seal the poly bag.
- 5.4.6 Place the bag in the deep well of the Marinelli beaker noble gas sample.
- 5.4.7 Place the bagged particulate filter sample, silver zeolite cartridge sample, and the Marinelli beaker noble gas sample into a larger clean poly bag.
- 5.4.8 Seal the outermost poly bag.
- 5.4.9 Using the ion chamber with the window closed, perform an on-contact Gamma radiation dose rate survey of the outermost bag.
- 5.4.10 Label the outermost bag with the on-contact Gamma radiation dose rate.
- Verify that the following information is recorded for all air sample analysis results on Form EPIPF-ENV-01-04, "EMT Orders/Field Data:"
 - Sample date and time
 - Sample location (to the nearest one-half of a grid coordinate)
 - Sample type (iodine, particulate, noble gas, or dose rate)
 - Readings (general area dose rate in mR/hr or net sample analysis results in μCi/cc)
- 5.6 Report all air-sample analysis results to the EMTCd via fax, telephone, or radio using Form EPIPF-ENV-01-04, "EMT Orders/Field Data."

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- 5.7 Deliver air sample to KNPP Security Building or alternate location, if directed.
- 5.8 While you are en route, notify the RPO/RAF via radio or cellular telephone that air samples will be delivered and estimated time of air sample delivery.

6.0 Final Conditions

6.1 This procedure is complete when all orders (EMT Standing Order SO-1, Attachment A of EPIP-ENV-04D, or "EMT Orders/Field Data," Form EPIPF-ENV-01-04) requiring air sampling have been completed, suspended, or terminated, the results have been reported to the EMTCd, and all air samples have been delivered.

7.0 References

- 7.1 EPIP-ENV-04A, Portable Survey Instrument Use
- 7.2 EPIP-ENV-04D, Plume Tracking for Environmental Monitoring Teams
- 7.3 HP-06.043, Battery Powered Air Sampler, Model H-810-B2

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.

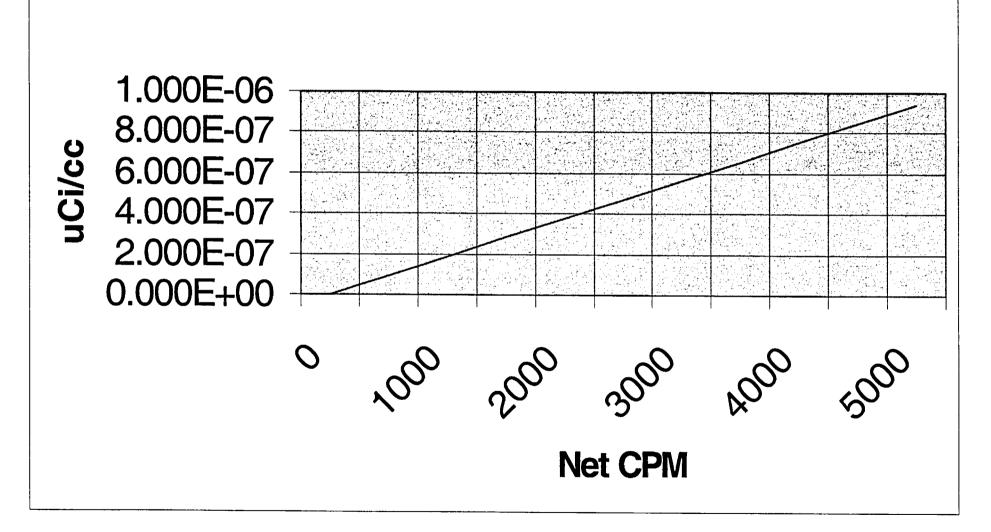
8.1.1 QA Records

- EMT Orders/Field Data, Form EPIPF-ENV-01-04
- EMT Standing Order SO-1, Attachment A of EPIP-ENV-04D

8.1.2 Non-QA Records

Radioactive Sample Tags

Net CPM vs I-131 Concentration

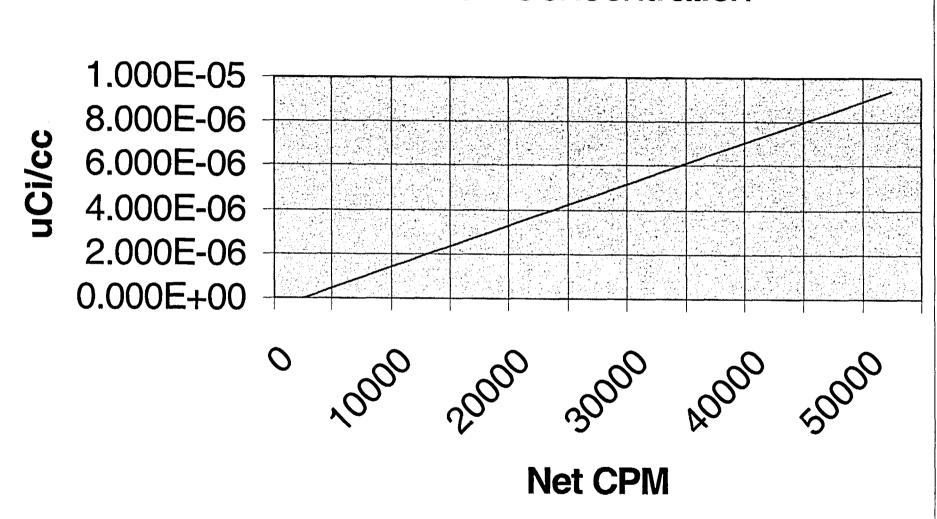


Attachment A EPIP-ENV-04B Rev. Y

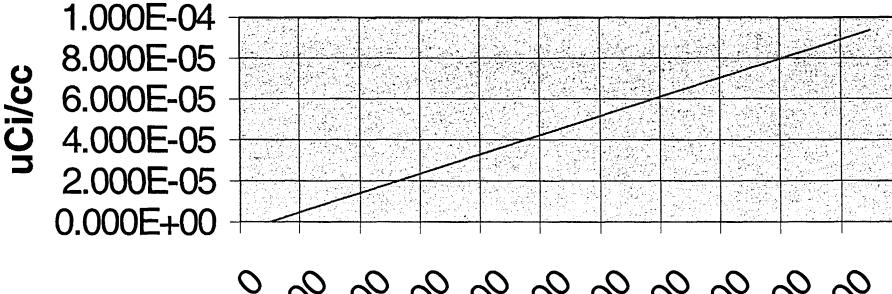
Date: JUL 31 2003 REFERENCE USE

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Net CPM Vs I-131 Concentration



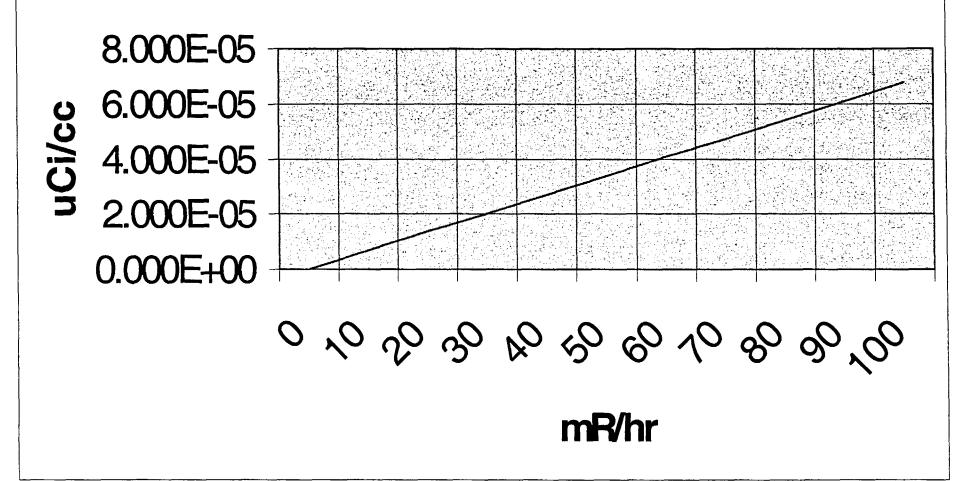
Net CPM vs. I-131 Concentrations

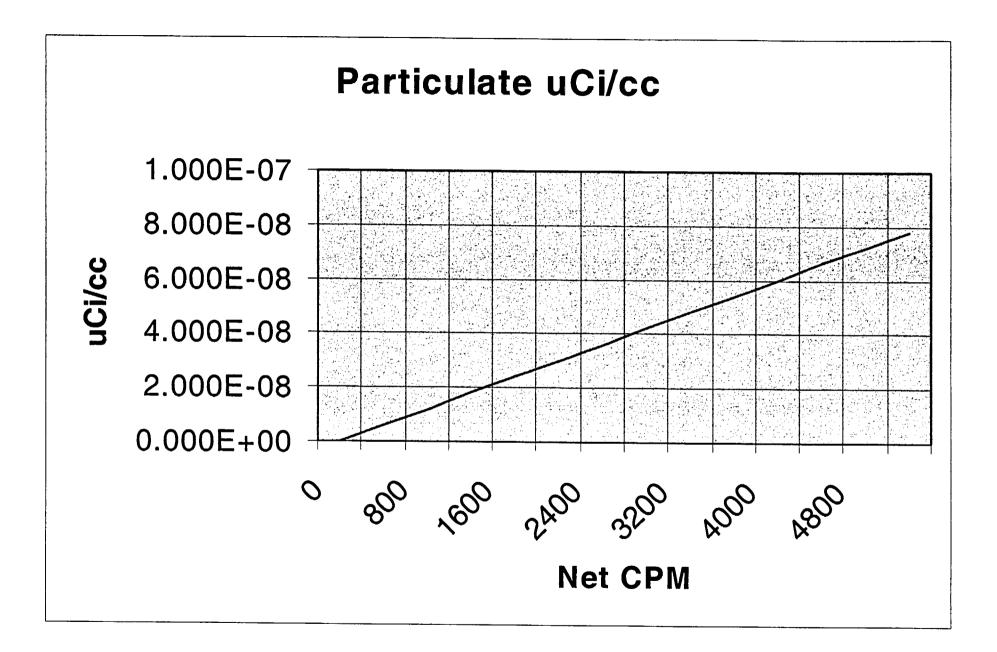


SOUND SOUND

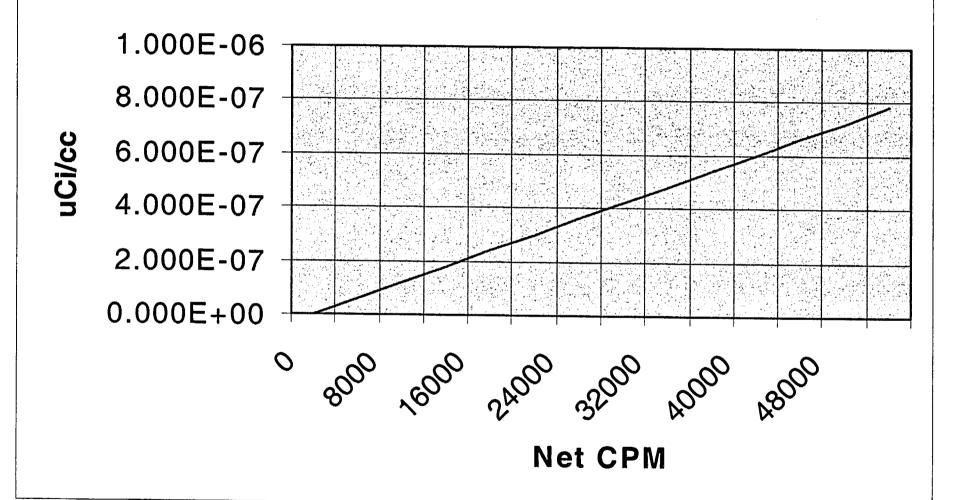
Net CPM

mR/hr vs. I-131 Concentrations





Particulate uCi/cc



Particulate uCi/cc 9.000E-06 8.000E-06 7.000E-06 6.000E-06 5.000E-06 4.000E-06 3.000E-06 2.000E-06 1.000E-06 0.000E + 000 3000 16000 74000 32000 40000 48000 **Net CPM**

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		Date	JUL 31 2003	Page 1 of 5	
Reviewed By	Michael Gagnon		Approv	red By Jerrie Morlino	
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		☐ Yes ☐ Yes ☐ No ☐ Changes Re	⊔ Yes

1.0 Purpose

1.1 This procedure provides instruction for performing ground deposition sampling and analysis during a declared plant emergency.

2.0 General Notes

- 2.1 The Environmental Monitoring Teams (EMTs) shall collect and analyze ground deposition samples in accordance with this procedure when directed.
- 2.2 Environmental Inc. (Midwest Lab.) (Previously Teledyne) (847-564-0700) shall be contacted for more detailed soil/vegetation/water/snow samples.

3.0 Precautions and Limitations

- 3.1 Wear rubber gloves while collecting all samples listed below and change gloves frequently to prevent sample cross contamination. EMTs should verify adequate supply available and wear protective clothing when directed by the EMT Coordinator based on known or suspected contamination.
- 3.2 Do <u>NOT</u> use plastic to wrap the detector of any instrument used to measure Beta radiation. Wrapping the detector in plastic during operation may shield Beta radiation. Instruments and their detectors may be placed in a plastic bag to prevent contamination while being transported.
- 3.3 EMTs shall <u>NOT</u> enter areas where projected or measured external radiation dose rates exceed 1 R/hr without receiving specific directions to enter the area, as approved by the Environmental Protection Director (EPD) or Radiological Protection Director (RPD).
- 3.4 Each instrument and its attached probe have been calibrated as a set. Do <u>NOT</u> interchange instruments and probes unless authorized by the Radiation Protection Group. Interchanging instruments and probes invalidates the instrument/probe calibration.
- 3.5 EMTs should always wear a reflective vest when performing EMT duties, especially when outside of the vehicle to obtain samples.

4.0 Initial Conditions

4.1 This procedure is to be used during a declared plant emergency by the EMTs when the teams are directed to collect and/or analyze ground deposition samples.

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5.0 Procedure

5.1 Ground Deposition Screening Techniques

Note

Background readings on roads and most fields will range from 10 to 150 CPM. Therefore, 300 CPM was selected as a reasonable action level.

- 5.1.1 <u>IF</u> directed to a specific sample location, <u>THEN</u> travel to that sample location.
- 5.1.2 <u>IF</u> directed to determine the presence of ground deposition, <u>THEN</u> reference EPIP-ENV-04A, Step 5.2.7.
- 5.1.3 Measure the Gamma radiation level (dose rate) using the ion chamber closed window while en route to the sample location.
- 5.1.4 Record the dose rate, time, and sample location on Form EPIPF-ENV-01-04, "EMT Orders/Field Data."
- 5.1.5 Select a representative surface from which a smear sample could be obtained (i.e., road pavement or other horizontal surface).
- 5.1.6 Perform a survey of the surface using an ASP-1 with the HP-260 probe.

Note

IF meter readings are erratic, instrument may need to be operated in the slow response mode of operation.

- a. Place the FAST/SLOW instrument response switch to the FAST position.
- b. Hold the detector within ½-inch from the surface to be surveyed.
- c. Move the detector over the surface to be surveyed at a rate of approximately 2 inches per second.
- d. Continuously monitor the meter reading and adjust the selector switch multiplication factor to the lowest range that does not produce an off-scale reading.
- e. Multiply the meter reading by the selected multiplication factor to determine the contamination level in counts per minute (CPM).
- f. <u>IF</u> the reading obtained in Step 5.1.6.e above is 300 CPM or greater, <u>THEN</u> perform Step 5.2 of this procedure.
- g. <u>IF</u> the meter reading obtained in above Step 5.1.6.e is less than 300 CPM, <u>THEN</u> go to next sample location (if any) and repeat Step 5.1 above.

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5.2 Collect Ground Deposition Samples

5.2.1 Collect a smear sample from the same surface measured in Step 5.1.6.f, Ground Deposition Screening.

Note

Put on a clean pair of rubber gloves prior to handling samples.

- a. Obtain cloth smear disc (NU-CON).
- b. Record the following information from the NU-CON cloth smear.
 - 1. Date of sample
 - 2. Time of sample
 - 3. Location of sample
 - 4. Technician (name of individual taking sample)
- c. Wipe a 4-inch square or 18-inch "S" shaped area with the cloth smear disc.
- d. Fold the smear holding paper in half so that the cloth smear disc is folded onto itself.
- e. IF directed, THEN analyze smear per Step 5.3 below.
- f. Label and bag smear per Step 5.4 below.

5.3 Analyze Ground Deposition Samples

5.3.1 <u>IF</u> directed, <u>THEN</u> determine the activity (in disintegrations per minute (DPM)) of the ground deposition cloth smear disc sample using an ASP-1 with the HP-260 probe.

Note

Count the sample only when located in an area with background Gamma radiation levels (outside the plume). Don a clean pair of rubber gloves prior to handling samples.

- a. Determine the background CPM.
 - 1. Hold the HP-260 probe in the air.
 - 2. Record the results of Step 5.3.1.a.1 above as background (BKGD) CPM.
- b. Determine the gross sample CPM.
 - 1. Place the HP-260 probe directly on contact with the cloth smear disc sample (small raised bumps on the detector will prevent contamination of the detector).
 - 2. Record the results of Step 5.3.1.b.1 above as gross sample CPM.

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- c. Determine the net sample CPM.
 - 1. Subtract the background CPM from Step 5.3.1.a.2 above from the cloth smear disc gross sample CPM from Step 5.3.1.b.2.

(Net sample CPM = smear sample CPM - background CPM)

- d. Determine the net sample DPM.
 - 1. Multiply the net CPM obtained in Step 5.3.1.c.1 above by the efficiency factor (EF) listed on the ASP-1 instrument calibration sticker.

(Net sample DPM = net sample CPM x EF)

- e. Record results from Step 5.3.1.d above, as DPM/100 cm² or DPM/smear if < 100 cm² area was surveyed on Form EPIPF-ENV-01-04, "EMT Orders/Field Data."
- 5.3.2 Verify that the following information is recorded for all ground deposition samples on Form EPIPF-ENV-01-04, "EMT Orders/Field Data:"
 - Sample date and time
 - Sample location (to the nearest one-half of a grid coordinate)
 - Sample type (ground deposition or dose rate)
 - Readings (sample results in DPM/100 cm², DPM/smear, or mR/hr)
- 5.3.3 Make all ground deposition sample analysis results available to the Environmental Monitoring Team Coordinator (EMTCd) via fax, telephone, or radio using Form EPIPF-ENV-01-04, "EMT Orders/Field Data."
- 5.4 Label and Bag Ground Deposition Samples
 - 5.4.1 Place each smear sample in a clean poly bag.
 - 5.4.2 Complete the radioactive sample tag.

Note

All labels or tags shall contain the following information:

- Sample location (to the nearest one-half of a grid coordinate)
- General area dose rate (mR/hr) at the sample location
- Type of sample (ground deposition)
- Date
- Time sample taken
- Initials of individual completing the sample tag

REFERENCE USE

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- 5.4.3 Place the radioactive sample tag in the bag along with the smear disc.
- 5.4.4 Seal the bag.
- 5.4.5 Using the ion chamber with window closed, perform an on-contact Gamma radiation dose rate survey of the bag.
- 5.4.6 Label the bag with the on-contact Gamma radiation dose rate.
- Unless otherwise directed, deliver the ground deposition samples to the KNPP Security Building. Notify the RPO/RAF of the estimate delivery time.
- 5.4.8 While en route, notify the RPO/RAF via radio or cellular telephone that ground deposition samples will be delivered and estimated time of sample delivery.
- 5.5 <u>IF</u> final conditions as stated in Step 6.1 have not been met, <u>THEN</u> return to Step 5.1 of this procedure.

6.0 Final Conditions

6.1 This procedure is complete when all orders ("EMT Orders/Field Data," Form EPIPF-ENV-01-04) requiring ground deposition sampling have been completed, suspended, or terminated, the results have been reported to the EMTCd, and all samples have been delivered.

7.0 References

- 7.1 EPIP-ENV-04A, Portable Survey Instrument Use
- 7.2 EPIP-ENV-04D, Plume Tracking for Environmental Monitoring Teams
- 7.3 Teledyne Isotopes Letter of Agreement

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**

EMT Orders/Field Data, Form EPIPF-ENV-01-04

8.1.2 Non-QA Records

Radioactive Sample Tags

WISCONSIN	PUBLIC SER	VICE CORP.	No.	EPIP-I	ENV-04D	Rev	<i>r</i> . P
Kewaunee Nuclear Power Plant Emergency Plan Implementing Procedure		Title Plume Tracking for Environment Monitoring Teams			nvironme	ntal	
		Date	JUL 31 2003		Page	1 of 10	
Reviewed By Sta	n Baker		Approv	ed By	lerrie Morlino		
Nuclear Safety Related	☐ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approva Temporary Changes Requ		☐ Yes ☑ No

1.0 Purpose

1.1 This procedure provides instruction for locating and tracking an airborne radiological release.

2.0 General Notes

2.1 None

3.0 Precautions and Limitations

- 3.1 Perform all actions for tracking an airborne radiological release (plume) while keeping personnel exposures As Low As Reasonably Achievable (ALARA).
- 3.2 Environmental Monitoring Teams (EMTs) shall <u>NOT</u> enter areas where projected or measured external radiation dose rates exceed 1 R/hr without receiving specific directions to enter the area, as approved by the Environmental Protection Director (EPD) or Radiological Protection Director (RPD).
- 3.3 <u>IF</u> the presence of radioactive iodine in the plume is suspected or detected, <u>THEN</u> refer to EPIP-AD-18, "Potassium Iodide Distribution," for guidance.
- 3.4 Each instrument and its attached probe have been calibrated as a set. Do <u>NOT</u> interchange instruments and probes unless authorized by the Radiation Group. Interchanging instruments and probes invalidates the instrument/probe calibration.
- 3.5 EMTs should verify adequate supply available and wear protective clothing when directed by the EMT Coordinator based on known or suspected contamination.

4.0 Initial Conditions

- 4.1 An emergency has been declared and a radiological release (plume) has occurred, is imminent, or in progress.
- 4.2 Off-site monitoring may be implemented to confirm that a radiological release (above normal limits) is not occurring.
- 4.3 EMT activation per EPIP-ENV-02, "Environmental Monitoring Team Activation," is complete.

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5.0 Procedure

Note

The RPO/RAF should be the first facility fully activated. Therefore initial contacts and direction should come from there. Once the EOF is activated then all directions, reporting, and communication should be through the EMT Coordinator.

5.1 Actions for the EMTs

- 5.1.1 Obtain current annual dose (TEDE) from the Radiation Protection Office (RPO)/ Radiological Analysis Facility (RAF), or Emergency Operations Facility (EOF).
- 5.1.2 Obtain meteorological data, and status of any radiological release and record on Form EPIPF-ENV-01-03, "Meteorological and Plant Status Data."
- 5.1.3 <u>IF</u> changes or discrepancies in meteorological or plant conditions are observed, <u>THEN</u> report them to the EMTCd if activated, otherwise inform the RPO/RAF.

<u>Note</u>

Environmental Monitoring Teams (EMTs) shall <u>NOT</u> enter areas where projected or measured external radiation dose rates exceed 1 R/hr without specific direction from the EPD or RPD.

Note

The first team activated should perform EMT Standing Order SO-1, the second team activated should perform EMT Standing Order SO-2, and the third team activated should perform EMT Standing Order SO-3.

- 5.1.4 Implement EMT Standing Orders (SO) based on the team designation as follows:
 - 5.1.4.1 Team A, implement SO-1
 - 5.1.4.2 Team B, implement SO-2
 - 5.1.4.3 Team C, implement SO-3
- 5.1.5 <u>IF</u> any conflicts occur with the performance of orders assigned, <u>THEN</u> immediately contact the EMTCd (if the EOF is activated, otherwise contact the RPO/RAF) for resolution.
- 5.1.6 Contact the EMTCd, AND
 - 5.1.6.1 Relay the annual dose information for each team member.
 - 5.1.6.2 Obtain meteorological and plant conditions

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- 5.1.7 Report field data results promptly to the EMTCd or the RPO/RAF.
 - a. Use the "EMT Field Data" section of Standing Orders to record Gamma and Beta radiation dose rates.
 - b. Use Form EPIPF-ENV-01-04, "EMT Orders/Field Data," for air sample and ground deposition sample analysis results.
- 5.1.8 <u>WHEN</u> an order is completed, suspended, or terminated, <u>THEN</u> request additional instructions from EMTCd or RPO/RAF.
- 5.1.9 Continue field monitoring activities as directed by the EMTCd until relieved or activities are terminated.

6.0 Final Conditions

6.1 This procedure is complete when all EMT orders (Form EPIPF-ENV-01-04, "EMT Orders/Field Data") have been completed or terminated.

7.0 References

- 7.1 EPIP-AD-18, Potassium Iodide Distribution
- 7.2 EPIP-ENV-04A, Portable Survey Instrument Use
- 7.3 EPIP-ENV-04B, Air Sampling and Analysis
- 7.4 EPIP-ENV-04C, Ground Deposition Sampling and Analysis
- 7.5 EPIP-ENV-02, Environmental Monitoring Team Activation

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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

- Meteorological and Plant Status Data, Form EPIPF-ENV-01-03
- EMT Orders/Field Data, Form EPIPF-ENV-01-04
- EMT Standing Order SO-1, Attachment A
- EMT Standing Order SO-2, Attachment B
- EMT Standing Order SO-3, Attachment C
- Emergency Planning Zone (EPZ) Grid Map
- Form HPF-114, Map J-1, Site Map

8.1.2 Non-QA Records

None

EMT STANDING ORDER SO-1 Page 1 of 2

DATE/TIME:				
TEAM (Circle One):	A	В	C	

ORDER ID: <u>EMT STANDING ORDER SO-1</u>

- INSTRUCTIONS: (1) Locate the plume centerline in the vicinity of the site boundary by performing Gamma radiation dose rate surveys according to EPIP-ENV-04A, "Portable Survey Instrument Use."
 - (2) During a radioactive release, read dosimeters every 15 minutes.

Report dosimeter readings every hour or every 100 mrem (whichever comes first) to the EMTCd.

- (2) Collect an air sample on plume centerline according to EPIP-ENV-04B, "Air Sampling and Analysis."
- (3) Deliver air sample to KNPP Security Building or alternate location, if directed. Notify RPO/RAF of estimated delivery time.
- (4) When directed, determine the extent of ground deposition using EPIP-Env-04C, "Ground Deposition Sampling and Analysis."

DIRECTIONS FOR REPORTING FIELD DATA:

- 1. SAMPLE DATE/TIME Enter date/time dose rate reading was taken, date/time air sample collection was completed, or date/time deposition sample was collected.
- 2. GRID COORDINATES Specify sample location to the nearest one-half of a grid coordinate.
- 3. SAMPLE TYPE Enter appropriate description.

Iodine (I)
Particulate (P)
Noble Gas (NG)
Dose Rate (DR)
Deposition (DP)

4.

Dose Rate - mrem/hour
Air Sample (Iodine, Particulate, or Noble Gas) - μ Ci/cc
Deposition - dpm/100 cm² or dpm/smear if < 100 cm² is surveyed

READING - Enter reading using correct units.

Attachment A EPIP-ENV-04D Rev. P

EMT STANDING ORDER SO-1 Page 2 of 2

EMT FIELD DATA

SAMPLE DATE/TIME	GRID COORDINATES	SAMPLE TYPE	READING (mrem/hr)
		DR	mrem/hr

Attachment A EPIP-ENV-04D Rev. P

EMT STANDING ORDER SO-2 Page 1 of 2

DATE/TIME:				
TEAM (Circle One):	A	В	C	

ORDER ID: <u>EMT STANDING ORDER SO-2</u>

- INSTRUCTIONS: (1) Locate and track the leading boundary (edge) of the plume by performing Gamma radiation dose rate surveys according to EPIP-ENV-04A, "Portable Survey Instrument Use."
 - (2) During a radioactive release, read dosimeters every 15 minutes.
 - (3) Report dosimeter readings every hour or every 100 mrem (whichever comes first) to the EMTCd.
 - (4) When directed, determine the extent of ground deposition using EPIP-ENV-04C, "Ground Deposition Sampling and Analysis."

DIRECTIONS FOR REPORTING FIELD DATA:

- 1. SAMPLE DATE/TIME Enter date/time dose rate reading was taken, date/time air sample collection was completed, or date/time deposition sample was collected.
- **2. GRID COORDINATES** Specify sample location to the nearest one-half of a grid coordinate.
- 3. SAMPLE TYPE Enter appropriate description.

Iodine (I)
Particulate (P)
Noble Gas (NG)
Dose Rate (DR)
Deposition (DP)

4. READING - Enter reading using correct units.

Dose Rate - mrem/hour Air Sample (Iodine, Particulate, or Noble Gas) - μ Ci/cc Deposition - dpm/100 cm² or dpm/smear if < 100 cm² is surveyed

Attachment B EPIP-ENV-04D Rev. P

EMT STANDING ORDER SO-2 Page 2 of 2

EMT FIELD DATA

SAMPLE DATE/TIME	GRID COORDINATES	SAMPLE TYPE	READING (mrem/hr)
		DR	mrem/hr

EMT STANDING ORDER SO-3 Page 1 of 2

DATE/TIME:					
TEAM (Circle One):	A	В	C		

ORDER ID: EMT STANDING ORDER SO-3

- INSTRUCTIONS: (1) Locate and track the lateral boundaries (edges) of the plume within 5 miles of KNPP by performing Gamma radiation dose rate surveys according to EPIP-ENV-04A, "Portable Survey Instrument Use."
 - (2) During a radioactive release, read dosimeters every 15 minutes.

Report dosimeter readings every hour or every 100 mrem (whichever comes first) to the EMTCd.

- (3) <u>WHEN</u> the release is terminated, <u>THEN</u> locate and track the trailing edge of the plume.
- (4) Report Gamma radiation dose rate readings to EMTCd or RPO/RAF every 15 minutes or more frequently, if directed.
- (5) When directed, determine the extent of ground deposition using EPIP-ENV-04C, "Ground Deposition Sampling and Analysis."

DIRECTIONS FOR REPORTING FIELD DATA:

- 1. SAMPLE DATE/TIME Enter date/time dose rate reading was taken, date/time air sample collection was completed, or date/time deposition sample was collected.
- 2. GRID COORDINATES Specify sample location to the nearest one-half of a grid coordinate.
- 3. SAMPLE TYPE Enter appropriate description.

Iodine (I)
Particulate (P)
Noble Gas (NG)
Dose Rate (DR)
Deposition (DP)

4. **READING** - Enter reading using correct units.

Dose Rate - mrem/hour Air Sample (Iodine, Particulate, or Noble Gas) - μ Ci/cc Deposition - dpm/100 cm² or dpm/smear if < 100 cm² is surveyed

Attachment C EPIP-ENV-04D Rev. P

EMT STANDING ORDER SO-3 Page 2 of 2

EMT FIELD DATA

SAMPLE DATE/TIME	GRID COORDINATES	SAMPLE TYPE	READING (mrem/hr)
		DR	mrem/hr

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		Title Emergency Operations F Activation			s Facility (I	racility (EOF)	
Emergenc	Emergency Plan Implementing Procedure		Date	Jt	л. 31 2003	Page	of 4
Reviewed By	Bruce Heitzkey	·	_ Approv	ed By	errie Morlino		
Nuclear Safety Related	☐ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approval Temporary Changes Requ		□ Yes ☑ No

1.0 Purpose

1.1 This procedure provides instruction for activating the Emergency Operations Facility (EOF).

2.0 General Notes

- 2.1 Telephone numbers and location of staff positions for the EOF are located in Section ETD 01A of the KPB Emergency Telephone Directory, located in the EOF bookcase.
- 2.2 A general description of communications equipment is contained in APPX-A-1, "Communication System Description," and may be helpful in resolving minor problems with the equipment.

3.0 Precautions and Limitations

- 3.1 If any of the actions on Form EPIPF-EOF-02-01, "EOF Activation Checklist," cannot be satisfied in a reasonable period of time, then the problem shall be noted on Form EPIPF-EOF-02-01 and an Action Request (AR) initiated at the next convenient opportunity. Consideration of activation should not be delayed for problems with individual actions on Form EPIPF-EOF-02-01.
- 3.2 The Emergency Response Manager (ERM) will make the decision whether the EOF can be activated prior to resolution of problems.
- 3.3 If it becomes necessary to evacuate or relocate the EOF, the ERM should utilize the guidance supplied in Section 5.2 to assist in transferring the functionality of the EOF to an alternate facility.

4.0 Initial Conditions

- 4.1 The EOF shall be activated for an Alert, Site Emergency, General Emergency, or at the discretion of the ERM.
- 4.2 Upon activation of the EOF, the Administrative and Logistics Director (ALD) shall assign and complete actions in accordance with this procedure.

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5.0 Procedure

5.1 Activation

<u>Note</u>

The ALD is responsible for ensuring the EOF Activation Checklist is complete and then handing it over to the ERM. However, any person who arrives should take the checklist and start the activation.

5.1.1 Complete Form EPIPF-EOF-02-01, "EOF Activation Checklist."

Note

The ERM may declare the EOF activated if he has sufficient staff to perform the functions required for the event.

- 5.1.2 The following positions and functions are recommended to be established at a minimum to declare the EOF activated:
 - Emergency Response Manager for PAR function
 - Environmental Protection Director for dose assessment
 - Dose Projection Calculator for offsite dose calculations
 - Offsite Communicator for communications with the State and Counties for notifications
 - ERF Communicator-EOF for the 4-way communication bridge
 - Engineering and Licensing Support for completion of the Event Notice form
 - State Radiological Coordinator Liaison for radiological communications with the State
- 5.1.3 <u>IF</u> communications or PC equipment problems are identified, <u>THEN</u> contact WPSC Information Technology Services (ITS) <u>OR</u> Telecommunications as listed in the KPB Emergency Telephone Directory, Section ETD 04, <u>AND</u> state the following:
 - Telephone number or system with the problem
 - The nature of the problem
 - That emergency service is needed
- 5.1.4 <u>WHEN</u> Form EPIPF-EOF-02-01, "EOF Activation Checklist," (Items 1 through 4) is completed, give the form to the ERM for review and signature.

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5.2 EOF Evacuation/Relocation

- 5.2.1 <u>IF</u> it becomes necessary to evacuate or relocate the EOF, <u>THEN</u> the ERM should consider the following in order to maintain the functionality of the EOF:
 - EOF Dose Assessment and Protective Action Recommendations may be formulated in the TSC
 - Command and control of Environmental Monitoring Teams may be transferred to the TSC
 - NRC and State and County communications may be handled from the TSC
 - The ERM may reposition to the TSC or the Point Beach EOF in the Point Beach Site Boundary Command Center

5.3 <u>Deactivation</u>

- 5.3.1 <u>WHEN</u> final conditions are met, complete Form EPIPF-EOF-02-02, "EOF Deactivation Checklist."
- 5.3.2 <u>WHEN</u> Form EPIPF-EOF-02-02 is completed, give the form to the ERM for review and signature.

6.0 Final Conditions

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 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 APPX-A-1, Communication System Description
- 7.3 KPB Emergency Telephone Directory
- 7.4 COMTRAK 88-169, Title Markers for the EOF Staff
- 7.5 NAD-11.08, Action Request Process

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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**

- Form EPIPF-EOF-02-01, EOF Activation Checklist
- Form EPIPF-EOF-02-02, EOF Deactivation Checklist

8.1.2 Non-QA Records

None

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Emergenc	y Plan Implementi	ing Procedure	Date	JĮ	JL 31 2003	Page 1	of 13
Reviewed By	Bruce Heitzkey		_ Approv	ed By	Ierrie Morlino		
Nuclear Safety Related	☐ Yes ☑ No	PORC Review Required		☐ Yes ☑ No	SRO Approval Temporary Changes Requi		☐ Yes ☑ No

1.0 Purpose

1.1 This procedure provides instruction for the Emergency Response Manager and other initial response personnel for an appropriate response to an **Unusual Event** at the Emergency Operations Facility (EOF).

2.0 General Notes

- 2.1 At the Unusual Event level, pager activation will be performed by SAS for all designated emergency response directors (primary and alternate).
- 2.2 <u>IF</u> approached by the media during a declared emergency, <u>THEN</u> 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.

3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07-01 should be initiated and in progress to state and local emergency governments within 15 minutes of the emergency level being declared or as soon as possible without further compromise to plant or public safety.
- 3.2 The Emergency Response Manager has the non-delegable responsibility for making protective action recommendations.
- 3.3 <u>IF</u> an emergency class escalation occurs during implementation of this procedure, <u>THEN</u> proceed immediately to EPIP-EOF-04, "EOF Staff Action for Alert or Higher."
- 3.4 Only the following personnel may authorize support personnel, without Kewaunee I.D. cards, access to the EOF during a declared emergency:
 - 3.4.1 Emergency Response Manager (ERM)
 - 3.4.2 Administrative Logistics Directors (ALD)
 - 3.4.3 Environmental Protection Director (EPD)

4.0 Initial Conditions

4.1 This procedure shall be implemented upon declaration of an **Unusual Event** or when directed by the Emergency Response Manager.

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5.0 Procedure

Note

It is the ERMs responsibility to provide overall direction and coordination of the KNPP emergency response activities, make protective action recommendations to government authorities, coordinate efforts with external organizations (governmental, industry, vendors, etc.), and support the plant's efforts to mitigate the accident by ensuring continuity of resources for long-term operation of the emergency response organization.

5.1 Emergency Response Manager (ERM) shall:

- 5.1.1 <u>WHEN</u> notified that an Emergency has been declared:
 - a. Report to the Emergency Operations Facility.
 - b. <u>IF</u> an Emergency Response Manager has been designated, until released, <u>THEN</u>:
 - 1. If appropriate, plan a shift relief per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."
 - 2. Assist the designated Emergency Response Manager.
 - c. <u>IF</u> an Emergency Response Manager has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Emergency Response Manager and continue implementation of this procedure.
- 5.1.2 Notify the Emergency Director of your arrival and assumption of the Emergency Response Manager duties.

<u>Note</u>

Consider calling in a State Radiological Coordinator Liaison (SRCL).

- 5.1.3 Verify the Environment Protection Director (EPD) is prepared to transmit radiological related data and general plant conditions to the State Radiological Coordinator in the State Emergency Operations Center (Madison).
- 5.1.4 <u>IF</u> director(s) are <u>NOT</u> arriving at the EOF in a reasonable amount of time, <u>THEN</u> instruct the ALD to contact the individuals needed by telephone and/or by their pager number (see Emergency Telephone Directory).
- 5.1.5 <u>IF</u> a director position cannot be filled, <u>THEN</u> assign the director's duties to another director's position.

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<u>Note</u>

The EOF can be activated for individual functions, i.e., off-site notifications without full activation of the facility.

- 5.1.6 Direct the Administrative Logistics Director (ALD) to contact the appropriate WPSC support personnel to inform them that their assistance is or may be needed. (See Emergency Telephone Directory, Section ETD 04).
- 5.1.7 If requested by the ED, direct the ALD to complete activation of the EOF appropriate to the nature of the event in accordance with EPIP-EOF-02, "Emergency Operations Facility (EOF) Activation."
- 5.1.8 Direct the Environmental Protection Director (EPD) to contact the appropriate Environmental Monitoring Team Personnel with instructions to standby for a possible call in.
- 5.1.9 Establish communications with the Technical Support Center and Control Room through the Darome Conference System.
- 5.1.10 Verify the status of off-site agency communications that have taken place from the Control Room.

Note

The appropriate Government Agency contacts for the ERM are:

- State of Wisconsin Office in Charge (OIC) @ Dial Select 83 or 608-242-3260/3261
- Kewaunee County Emergency Government (Director) @ Dial Select 43 or 920-487-5257
- Manitowoc County Emergency Management Director @ Dial Select 53 or 920-683-4916/4918
- 5.1.11 WHEN confirmed that the EOF is capable of assuming off-site notification,
 - a. Assume the responsibility for off-site notification.
 - b. Inform the ED of the transfer of this responsibility.
 - c. Contact the State and County EOCs (if active) and notify them that the EOF has the responsibility for off-site communications.
- 5.1.12 Contact and notify the JPIC Manager of the EOF activation status.
- 5.1.13 Ensure the KPB Nuclear Emergency Public Information Plan is being implemented for an Unusual Event.

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5.1.14 Review requirements for escalation, termination, and recovery situations with the Emergency Director (per EPIP-AD-02, "Emergency Class Determination").

Note

Off-site protective actions for the public are <u>NOT</u> required for Unusual Events.

- 5.1.15 As required, instruct the Environmental Protection Director to review off-site dose measurements and projections to ensure the event classification is appropriate.
- 5.1.16 <u>IF</u> time permits, <u>THEN</u> contact off-site authorities via the Dial Select to discuss potential changes in classification and/or appropriate PAR.
- 5.1.17 <u>IF</u> notified by the ED of any change in EALs (event escalation), <u>THEN</u> go to EPIP-EOF-04.
- 5.1.18 <u>WHEN</u> contacted or periodically provide off-site authorities with the following (Dial Select is the preferred communication link):
 - Available information on the event status using "Plant Emergency Status Report," Form EPIPF-EOF-08-05, as a guide
 - Feedback that verifies and that clarifies the off-site authorities information
 - Information on the nature and direction of the event
- 5.1.19 Contact the ED periodically to receive an update on:
 - Status of the plant
 - Material and personnel support requirements
 - On-site or off-site radiological releases, potential releases, and release paths
 - Priorities of tasks to minimize the impact of the accident on the public
 - Incidents of public interest (i.e., fires, spills, personnel contamination/injury)
- 5.1.20 Periodically inform the ED of:
 - State and County priorities
 - State and County actions (i.e., protective actions, evacuations, traffic control, etc.)
 - State and County areas of concern
 - Media areas of interest and any misinterpretations of the plant situation

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- 5.1.21 Determine the EOF priorities, evaluate activities in the following areas:
 - Logistical requirements to mitigate significant plant evolutions
 - Off-site consequences
 - Protective action recommendations
- 5.1.22 Brief the EOF Emergency Response Organization periodically.
- 5.1.23 Ensure that the Plant Spokesperson is informed.
 - a. Forward plant status and public interest information to the Plant Spokesperson for appropriate use in briefings to the:
 - Public
 - Media
 - WPSR and NMC Senior Management
 - Partners
 - Other financial stakeholders in KNPP or WPSR
 - b. Review news statements.
 - c. Review press conferences.
 - d. Inform the Plant Spokesperson of any factual errors or ambiguities in the news statements or conferences.

Note

In fast breaking events, the ERM may give verbal authorization instead of written approval to release the statement.

- e. Approve news statements prior to being released to the media.
- 5.1.24 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.1.25 If plant conditions meet the requirements of Section 5.1 of EPIP-AD-15, "Recovery Planning and Termination," recovery activities or termination can be implemented in accordance with EPIP-AD-15.
- 5.1.26 <u>IF</u> Final Conditions are <u>NOT</u> met (Section 6.0), <u>THEN</u> return to Step 5.1.11.
- 5.1.27 <u>WHEN</u> Final Conditions are met (Section 6.0):
 - a. <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level is declared or full activation of the EOF is appropriate, <u>THEN</u> implement EPIP-EOF-04.

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- b. <u>IF</u> termination is declared or plant conditions meet the requirements for plant recovery, <u>THEN</u> the ERM shall ensure the following actions are taken:
 - 1. Ensure that termination or plant recovery Event Notifications has been completed in accordance with EPIP-AD-07.
 - 2. Verify that all off-site agencies and support groups who were initially notified were informed of the Unusual Event termination or plant recovery.
 - 3. Ensure each director notifies the personnel he has previously placed on standby.
 - 4. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 - 5. Collect all completed records, logs, forms, notes, and other documentation and give them to the ALD.
 - 6. Schedule a self-critique with all event participants in the EOF (all shifts) as soon as practical.

5.2 Administrative Logistics Director (ALD) shall:

- 5.2.1 <u>WHEN</u> notified that an emergency has been declared,
 - a. Report to the Emergency Operations Facility immediately.
 - b. <u>IF</u> an Administrative Logistics Director has been designated, until released, <u>THEN</u>:
 - 1. If appropriate, plan a shift relief per EPIP-AD-05.
 - 2. Assist the designated Administrative Logistics Director.
 - c. <u>IF</u> an Administrative Logistics Director has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Administrative Logistics Director and continue implementation of this procedure.
- 5.2.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Administrative Logistics Director.
- 5.2.3 As directed by the ERM:
 - a. Contact the EOF support personnel or others.
 - b. Instruct them to report to the EOF immediately or to remain on standby for further instructions.
- 5.2.4 Complete activation of the EOF appropriate to the nature of the event in accordance with EPIP-EOF-02.

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- 5.2.5 As needed, assign EOF support personnel.
- 5.2.6 Establish procedures for the long-term storage of the documents, records, and logs generated by the plant.
- 5.2.7 Ensure that appropriate logs, records, and documents, as directed below, are maintained for the duration of the event. Those logs, records, and documents shall include, but <u>NOT</u> be limited to,
 - Ongoing plant status and conditions
 - Date and time of significant accident events
 - Chronology of plant accident mitigation and repair priorities
 - All calculated, measured, or state provided radiological release data and information
 - All event notification and status update documents generated
 - Any messages generated or recorded
 - All PPCS computer printouts generated for status board maintenance or general information
 - All logs maintained by EOF directors
 - All News statements from the JPIC
- 5.2.8 Monitor the flow of information in the EOF and correct any problems.
- 5.2.9 If required, arrange for communication system service repair (See EPIP-EOF-02, Step 5.1.2).
- 5.2.10 If required, obtain purchasing support (see Emergency Telephone Directory, ETD04 for NMC contact) for assistance in the following:
 - Material purchase and control contract negotiations, expense accounts
- 5.2.11 If needed, provide for the following manpower needs:
 - Technical and craft disciplines through organizations such as Westinghouse Electric Corporation, Fluor Engineering, INPO
 - If needed, arrange for labor relations assistance
- 5.2.12 If needed, obtain the following logistical assistance for:
 - Transportation of emergency response personnel
 - Airline and hotel accommodations

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- Office supplies and furniture
- Document reproduction
- Food deliveries
- Sanitation
- 5.2.13 Periodically contact any EOF staff members on standby and update them on the event status.
- 5.2.14 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.2.15 IF Final Conditions are NOT met (Section 6.0), THEN return to Step 5.2.5.
- 5.2.16 WHEN Final Conditions are met (Section 6.0),
 - a. <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level is warranted or full activation of the EOF is appropriate, <u>THEN</u> implement EPIP-EOF-04.
 - b. <u>IF</u> termination is declared or plant conditions meet the requirements for plant recovery, <u>THEN</u> the ALD shall ensure the following actions are taken:
 - 1. Contact any EOF staff members on standby and notify them of the change in event status.
 - 2. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 - 3. Collect all completed records, logs, forms, notes, and other documentation generated during the course of the event.
 - 4. Ensure "EOF Deactivation Checklist," Form EPIPF-EOF-02-02, is completed per EPIP-EOF-02.
- 5.3 Environmental Protection Director (EPD) shall:
 - 5.3.1 <u>WHEN</u> notified that an emergency has been declared:
 - a. Report to the Emergency Operations Facility.
 - b. <u>IF</u> an Environmental Protection Director has been designated, until released, <u>THEN</u>:
 - 1. If appropriate, plan a shift relief per EPIP-AD-05.
 - 2. Assist the designated Environmental Protection Director.
 - c. <u>IF</u> an Environmental Protection Director has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Environmental Protection Director and continue implementation of this procedure.

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- 5.3.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Environmental Protection Director.
- 5.3.3 <u>IF</u> directed by the ERM, <u>THEN</u> contact the environmental team organization and instruct them to standby for possible call in.
- 5.3.4 Maintain an overall awareness of environmental conditions and the contributing factors for development of protective action recommendations in accordance with procedure EPIP-AD-19.
- 5.3.5 As necessary, establish and maintain communication with other Emergency Response Organization Directors and Off-Site Authorities.
- 5.3.6 Periodically contact Environmental staff members on standby and update them on the event status.
- 5.3.7 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.3.8 <u>IF</u> Final Conditions (Section 6.0) are not met, <u>THEN</u> return to Step 5.3.4.
- 5.3.9 WHEN Final Conditions are met (Section 6.0),
 - a. <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level is declared or full activation of the EOF is appropriate, <u>THEN</u> implement EPIP-EOF-04.
 - b. <u>IF</u> termination is declared or plant conditions meet the requirements for plant recovery, <u>THEN</u> the EPD shall ensure the following actions are taken:
 - 1. Contact any Environmental staff members on standby and notify them of the change in event status.
 - 2. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 - 3. Collect all completed records, logs, forms, notes, and other documentation and give them to the ALD.
 - 4. Schedule a self-critique with all event participants in the Environmental Group (all shifts) as soon as practical.

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- 5.4 State Radiological Coordinator Liaison (SRCL) shall:
 - 5.4.1 WHEN notified that an emergency has been declared,
 - a. Report to the Emergency Operations Facility.
 - b. <u>IF</u> a State Radiological Coordinator Liaison has been designated, until released, <u>THEN</u>
 - 1. If appropriate, plan a shift relief per EPIP-AD-05.
 - 2. Assist the designated State Radiological Coordinator Liaison.
 - c. <u>IF</u> a State Radiological Coordinator Liaison has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the State Radiological Coordinator Liaison and continue implementation of this procedure.
 - 5.4.2 Notify the Environmental Protection Director of your assumption of the responsibilities of the State Radiological Coordinator Liaison.
 - 5.4.3 Complete Form EPIPF-EOF-04-01, "SRCL Initial Action Checklist."

The SRCL gathers information from initial response personnel in order to enter the available information on Form EPIPF-EOF-08-05 and Form EPIPF-EOF-08-06, so that this information can be verbally communicated to the State and Counties, or faxed if they request it.

- 5.4.4 On a continual basis, collect available information using the following as a guide:
 - Form EPIPF-EOF-08-05, "Plant Emergency Status Report"
 - Form EPIPF-EOF-08-06, "Radiological Status Report"
 - Other sources that would provide information to assist the SRC in making decisions concerning public health and safety.
- 5.4.5 Transmit information to the SRC and County EOCs by phone as promptly as possible.

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- 5.4.6 <u>IF</u> specifically requested by State or County officials, <u>THEN</u> provide written radiological event summaries using Form EPIPF-EOF-08-06 and written plant status updates using Form EPIPF-EOF-08-05, for transmission to those officials by facsimile.
 - a. Complete the forms with available information.
 - b. Obtain ERM approval of the completed forms.
 - c. Inform the EPD that you have completed "Radiological Status Report," Form EPIPF-EOF-08-06, to be transmitted by facsimile to State and County officials.
 - d. Ensure the forms are faxed to the State and County EOCs.

If needed, request an extra SRCL to cover the HPN phone.

- 5.4.7 Respond to calls from the NRC over the HPN phone.
- 5.4.8 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.4.9 <u>IF</u> Final Conditions are <u>NOT</u> met (Section 6.0), <u>THEN</u> return to Step 5.4.4.
- 5.4.10 <u>WHEN</u> Final Conditions are met (Section 6.0),
 - a. <u>IF</u> plant conditions degrade to where the declaration of a higher emergency level is declared or full activation of the EOF is appropriate, <u>THEN</u> implement EPIP-EOF-04.
 - b. <u>IF</u> termination is declared or plant conditions meet the requirements for plant recovery, <u>THEN</u> the SRCL shall ensure the following actions are taken:
 - 1. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 - 2. Collect all completed records, logs, forms, notes, and other documentation and give them to the ALD.

6.0 Final Conditions

- Plant Emergency has been Terminated or Recovery actions have begun and the Emergency Response Manager has suspended the use of EPIPs.
- 6.2 Plant conditions degrade to where the declaration of a higher emergency level is warranted or full activation of the ERO is appropriate.

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7.0 References

7.1

- EPIP-AD-02, Emergency Class Determination 7.2
- EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.3 EPIP-AD-15, Recovery Planning and Termination
- 7.4 EPIP-AD-19, Protective Action Guidelines
- 7.5 EPIP-EOF-02, Emergency Operations Facility (EOF) Activation
- 7.6 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.7 EPIP-EOF-08, Continuing Emergency Notifications
- 7.8 EPIP-EOF-11, Internal Communication and Documentation Flow
- 7.9 **EPIP-APPX-A**, Communications
- 7.10 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.11 KPB Nuclear Emergency Public Information Plan
- 7.12 EPIP-AD-07, Initial Emergency Notifications
- 7.13 Kewaunee Nuclear Power Plant Emergency Plan
- 7.14 NRC Inspection Report K-87-195
- 7.15 COMTRAK 91-187, Item 10
- 7.16 **COMTRAK 96-163**

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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
- EOF Activation Checklist, Form EPIPF-EOF-02-01
- Plant Emergency Status Report, Form EPIPF-EOF-08-05
- Radiological Status Report, Form EPIPF-EOF-08-06
- SRCL Initial Action Checklist, Form EPIPF-EOF-04-01
- Telephone Communications Log Sheet, Form EPIPF-EOF-04-02

8.1.2 Non-QA Records

None

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Reviewed By	Richard Johnson		Approv	ed By	lerrie Morlino		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approval Temporary Changes Requ		☐ Yes ☑ No

1.0 Purpose

1.1 This procedure provides instruction for the Emergency Response Manager and other initial response personnel for an appropriate response to an Alert, Site Emergency, or General Emergency, at the Emergency Operations Facility (EOF).

2.0 General Notes

- 2.1 Personnel on-site depart for the EOF promptly through the security building, unless instructed to assemble elsewhere by the Gai-tronics announcement or security personnel.
- 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).
- 2.3 <u>IF</u> approached by the media during a declared emergency, <u>THEN</u> 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.

3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07-01, should be initiated and in progress to State and Local Emergency Governments within 15 minutes of the emergency level being declared or as soon as possible without further compromise to plant or public safety.
- 3.2 The Emergency Response Manager has the nondelegable responsibility for making protective action recommendations.
- 3.3 <u>IF</u> an emergency class escalation occurs during implementation of this procedure, <u>THEN</u> immediately reinitiate this procedure appropriate to the new emergency level declared.
- 3.4 Only the following personnel may authorize support personnel without Kewaunee I.D. cards access to the EOF during a declared emergency:
 - 3.4.1 Emergency Response Manager (ERM)
 - 3.4.2 Administrative/Logistics Director (ALD)
 - 3.4.3 Environmental Protection Director (EPD)

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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 Emergency Response Manager.

5.0 Procedure

Note

It is the ERMs responsibility to provide overall direction and coordination of the KNPP emergency response activities, make protective action recommendations to government authorities, coordinate efforts with external organizations (governmental, industry, vendors, etc.), and support the plant's efforts to mitigate the accident by ensuring continuity of resources for long term operation of the emergency response organization.

5.1 Emergency Response Manager (ERM) shall:

- 5.1.1 WHEN notified that an Emergency has been declared,
 - a. Report to the Emergency Operations Facility.
 - b. <u>IF</u> an Emergency Response Manager has been designated, until released, <u>THEN:</u>
 - 1. If appropriate, plan a shift relief per EPIP-AD-05, "Emergency Response Organization Shift Relief Guideline."
 - 2. Assist the designated Emergency Response Manager.
 - c. <u>IF</u> an Emergency Response Manager has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Emergency Response Manager or continue implementation of this procedure.

Note

The EOF can be activated for individual functions, i.e., off-site notifications prior to full activation of the facility.

- 5.1.2 Notify the Emergency Director of your arrival and assumption of the Emergency Response Manager duties for facility activation.
- 5.1.3 Verify the Off-Site Communicator in the EOF is taking responsibility for off-site notifications from the TSC.
- Verify a State Radiological Coordinator Liaison (SRCL) or the Radiological Protection Director (RPD) is prepared to transmit radiological related data and general plant conditions to the State Radiological Coordinator in the State Emergency Operations Center (Madison).

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- 5.1.5 Verify engineering/licensing and communicator support are available in the EOF.
- 5.1.6 <u>IF</u> director(s) or supporting staff positions are not arriving at the EOF in a reasonable amount of time, <u>THEN</u> instruct the Off-Site Communicator to contact the individuals needed by telephone and/or by their pager number (see Emergency Telephone Directory).
- 5.1.7 <u>IF</u> a director position cannot be filled, <u>THEN</u> assign that director's duties to another director's position.
- 5.1.8 Ensure the ALD is completing EOF activation in accordance with "Emergency Operations Facility (EOF) Activation," EPIP-EOF-02.
- 5.1.9 Ensure the ALD is establishing security in accordance with "Media Center/Emergency Operation Facility/Joint Public Information Center Security," EPIP-EOF-12.
- 5.1.10 Establish Communications with the Technical Support Center and Control Room through the Darome Conference System.
- 5.1.11 Through the Emergency Response Facility Communicator EOF, verify the status of off-site agency communications that have taken place from the Control Room.
- 5.1.12 <u>WHEN</u> confirmed with the Off-Site Communicator that the EOF is capable to assume off-site notification,
 - a. Assume the responsibility for off-site notifications.
 - b. Inform the ED of the transfer of this responsibility.
 - c. Instruct the Off-Site Communicator to contact the State and County EOCs (if active) and notify them that the EOF has the responsibility for off-site communications.

<u>Note</u>

Verbally inform the Emergency Director that you have accepted the PAR responsibilities.

- 5.1.13 ACCEPT formal turnover of the responsibility for PARs from the ED.
- 5.1.14 Ensure date and time is logged for turnover of responsibilities for PARs from the ED in the TSC.
- 5.1.15 Contact and notify the JPIC Manager of the EOF activation status.
- 5.1.16 Ensure the KPB Nuclear Emergency Public Information Plan is being implemented for the declared emergency.

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- 5.1.17 Ensure the EPD is taking steps to perform dose projections and provide assistance in making protective action recommendations.
- 5.1.18 Determine the emergency status by obtaining the following information from the emergency response organization in the EOF:
 - a. Engineering/Licensing Support
 - Significant plant evolutions
 - NRC response team status and issues
 - b. Environmental Protection Director
 - Status of Radiological Effluent Releases (potential off-site dose consequences)
 - Off-Site Dose Assessment Evaluation
 - Status of Environmental Monitoring Teams
 - Potassium Iodide Distribution
 - Adequacy of the Protective Action Recommendations
 - c. Administrative Logistics Director
 - EOF Activation and Operational Status (EPIP-EOF-02)
 - EOF/JPIC Security Status (EPIP-EOF-12)
 - Status of ERO response
 - Status of Information flow in the EOF
 - Continuity of resources for long term operation of the emergency response organization
 - d. State Radiological Coordinator Liaison
 - Status of communications with the State of Wisconsin, State Radiological Coordinator
 - State or County requests for "Radiological Status Report,"
 Form EPIP-EOF-08-06

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- e. Off-Site Communicator
 - Off-Site Communications status
 - Significant State and County concerns, priorities, and actions
 - PAR implementation status
 - State or County requests for "Plant Emergency Status Report,"
 Form EPIPF-EOF-08-05, or other information updates

Warning

It is <u>NOT</u> 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, "Emergency Class Determination," and other EPIPs are <u>NOT</u> 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.

- 5.1.19 Review requirements for escalation and de-escalation situations with the Emergency Director (EPIP-AD-02).
- 5.1.20 As required, review the EALs and plant status to ensure the event classification is appropriate (EPIP-AD-02).

Note

Off-site protective actions for the public are <u>NOT</u> required for events classified less than a general emergency.

- 5.1.21 As required, instruct the Environmental Protection Director to review off-site dose measurements and projections to ensure the event classification is appropriate.
- 5.1.22 Review current and potential protective action recommendations (EPIP-AD-19).
- 5.1.23 <u>IF</u> time permits, <u>THEN</u> contact Off-Site Authorities via the Dial Select to discuss potential changes in classification and/or appropriate PAR.
- 5.1.24 IF notified by the ED of any change in EALs, OR if there is a change in PARs, THEN:
 - a. Ensure, with the assistance of the Engineering/Licensing Support Coordinator, an "Event Notice," Form EPIPF-AD-07-01, is complete.
 - b. Review and sign all "Event Notice," Form EPIPF-AD-07-01, generated from the EOF.

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c. Direct the Off-Site Communicator to initiate State and County notifications using the "Event Notice," Form EPIPF-AD-07-01, and Attachment A of EPIP-EOF-08.

Note

The appropriate Government Agency contacts for the ERM are:

- State of Wisconsin Officer in Charge (OIC) @ Dial Select 83 or 608-242-3260/3261
- Kewaunee County Emergency Government (Director) @ Dial Select 43 or 920-487-5257
- Manitowoc County Emergency Management Director @ Dial Select 53 or 920-683-4916/4918
- 5.1.25 <u>WHEN</u> contacted, or periodically, provide Off-Site Authorities with the following (Dial Select is the preferred communication link):
 - a. Available information on the event status using applicable sections of "Plant Emergency Status Report," Form EPIPF-EOF-08-05, as a guide. This data can be provided by the Engineering/Licensing Coordinator.
 - b. <u>IF</u> a hard copy of "Plant Emergency Status Report" is specifically requested by State or County Officials, <u>THEN</u>:
 - Direct the Engineering/Licensing Coordinator to provide written plant event summaries using "Plant Emergency Status Report," Form EPIPF-EOF-08-05.
 - Review and approve "Plant Emergency Status Report," Form EPIPF-EOF-08-05.
 - Forward the approved "Plant Emergency Status Report," Form EPIPF-EOF-08-05, to the Off-Site Communicator with direction to fax them to the State and County EOCs.
- 5.1.26 <u>WHEN</u> a completed "Radiological Status Report," Form EPIPF-EOF-08-06, is received:
 - a. Review,
 - b. Approve, AND
 - c. Return to the SRCL.
- 5.1.27 Contact the ED periodically to receive an update on:
 - Status of the plant
 - Material and Personnel support requirements
 - On-site or off-site radiological releases or potential releases and release paths

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- Priorities of tasks to minimize the impact of the accident on the public
- Incidents of public interest (i.e., fires, spills, personnel contaminations/injuries)
- 5.1.28 Periodically inform the ED of:
 - State and County priorities
 - State and County actions (i.e., protective actions, evacuations, traffic control, etc.)
 - State and County areas of concern
 - Media areas of interest and any misinterpretations of the plant situation
- 5.1.29 Determine EOF priorities, evaluate activities in the following areas:
 - Logistical requirements to mitigate significant plant evolutions
 - Off-site dose consequences
 - Protective action recommendations
 - Protective actions implemented by the Counties
- 5.1.30 Periodically conduct briefings for the EOF Emergency Response Organization:
 - Status of the plant
 - Material and Personnel support requirements
 - On-site or off-site radiological releases or potential releases and release paths
 - Incidents of public interest (i.e., fires, spills, personnel contaminations/injuries)
 - State and County priorities
 - State and County actions (i.e., protective actions, evacuations, traffic control, etc.)
 - State and County areas of concern
 - Media areas of interest and any misinterpretations of the plant situation
 - EOF priorities
- 5.1.31 Ensure that the Plant Spokesperson is informed. Forward plant status and public interest information to the Plant Spokesperson for appropriate use in briefings to the:
 - Public
 - Media
 - WPSR and NMC Senior Management

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- Partners
- Other financial stakeholders in KNPP or WPSR

In fast breaking events, the ERM may give verbal authorization instead of written approval to release the statement.

- 5.1.32 Review and approve news statements prior to being released to the media.
- 5.1.33 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.1.34 <u>IF</u> plant conditions meet the requirements of Section 5.1 of EPIP-AD-15, "Recovery Planning and Termination," <u>THEN</u> recovery activities or termination can be implemented in accordance with EPIP-AD-15.
- 5.1.35 IF Final Conditions are NOT met (Section 6.0), THEN return to Step 5.1.17.
- 5.1.36 WHEN Final Conditions are met (Section 6.0),
 - a. Ensure that termination or plant recovery Event Notifications have been initiated by the Off-Site Communicator.
 - 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 forms, notes, and other documentation and give them to the ALD.
 - d. Schedule a self-critique with all event participants in the EOF (all shifts) as soon as practical.
- 5.2 Administrative Logistics Director (ALD) shall:
 - 5.2.1 WHEN notified that an Emergency has been declared,
 - a. Report to the Emergency Operations Facility immediately.
 - b. <u>IF</u> an Administrative Logistics Director has been designated, until released, THEN:
 - 1. If appropriate, plan a shift relief per EPIP-AD-05.
 - 2. Assist the designated Administrative Logistics Director.
 - c. <u>IF</u> an Administrative Logistics Director has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Administrative Logistics Director and continue implementation of this procedure.
 - 5.2.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Administrative Logistics Director.

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- 5.2.3 As directed by the ERM,
 - a. Contact EOF administrative support personnel or others.
 - b. Instruct them to report to the EOF immediately or to remain on standby for further instructions.
- 5.2.4 Support or implement the EOF activation process (EPIP-EOF-02), and ensure Form EPIPF-EOF-02-01, "EOF Activation Checklist" is completed.
- 5.2.5 Arrange for security support at the EOF, JPIC, and MC by implementing procedure EPIP-EOF-12.
- 5.2.6 As needed, assign EOF support personnel to provide administrative support as defined in EPIP-EOF-11, "Internal Communications and Documentation Flow," to:
 - a. Maintain status boards and event sheets (Step 5.1).
 - b. Ensure communications are properly distributed (Step 5.2).
 - c. Ensure that a "Master Log" is established and maintained (Step 5.3).
- 5.2.7 Establish procedures for the long term storage of the documents, records, and logs generated by the event.
- 5.2.8 Ensure that appropriate logs, records, and documents are maintained for the duration of the event. Those logs, records, and documents shall include as a minimum:
 - Ongoing plant status and conditions
 - Date and time of significant accident events
 - Chronology of plant accident mitigation and repair priorities
 - All calculated, measured, or State provided radiological release data and information
 - All event notification and status update documents generated
 - Any messages generated or recorded
 - All PPCS computer printouts generated for status board maintenance or general information
 - All logs maintained by EOF staff
 - All news statements from the JPIC
- 5.2.9 Monitor the flow of information in the EOF and correct any problems.
- 5.2.10 If required, arrange for communication system service repair (see EPIP-EOF-02, Step 5.1.2).

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- 5.2.11 If required, develop a shift schedule to provide for 24-hour operation of the EOF and security staff per EPIP-AD-05.
- 5.2.12 Obtain purchasing support (see KPB Emergency Telephone Directory, ETD 04 for NMC contact) for assistance in the following:
 - Material purchase and control contract negotiations, expense accounts
- 5.2.13 If needed, provide for the following manpower needs:
 - Technical and craft disciplines through organizations such as Westinghouse Electric Corporation, Fluor Engineering, or INPO
 - Labor relations' assistance
- 5.2.14 If needed, obtain the following logistical assistance for:
 - Transportation of emergency response personnel
 - Airline and hotel accommodations
 - Office supplies and furniture
 - Document reproduction
 - Food deliveries
 - Sanitation
- 5.2.15 IF Final Conditions are not met (Section 6.0), <u>THEN</u> return to Step 5.2.6.
- 5.2.16 WHEN Final Conditions are met (Section 6.0),
 - a. Verify all work areas are returned to normal status and emergency procedures, forms, etc., are returned to their proper place.
 - b. Collect all records and logs from all documents generated during the course of the event.
 - c. Ensure "EOF Deactivation Checklist," Form EPIPF-EOF-02-02, is completed per EPIP-EOF-02.

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5.3 Environmental Protection Director (EPD) shall:

- 5.3.1 WHEN notified that an Emergency has been declared,
 - a. Report to the Emergency Operations Facility.
 - b. <u>IF</u> an Environmental Protection Director has been designated, until released, THEN:
 - 1. If appropriate, plan a shift relief per EPIP-AD-05.
 - 2. Assist the designated Environmental Protection Director.
 - c. <u>IF</u> an Environmental Protection Director has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Environmental Protection Director and continue implementation of this procedure.
- 5.3.2 Notify the Emergency Response Manager of your assumption of the responsibilities of the Environmental Protection Director.
- 5.3.3 If necessary, establish the environmental team organization in accordance with EPIP-ENV-01, "Environmental Monitoring Group Organization and Responsibilities."
- 5.3.4 Ensure environmental and EPZ status boards are maintained along with a record of significant events, data reported, and directives given.
- 5.3.5 Provide overall direction to the Environmental Monitoring Group.
- 5.3.6 Prepare plant status updates for transmission to the Environmental Monitoring (EM) Teams.
- 5.3.7 Direct the State Radiological Coordinator Liaison to provide available information to the State Radiological Coordinator using Form EPIPF-EOF-08-06 as a guide.
- 5.3.8 Inform the RPD when an EM Team member approaches administrative or legal radiological exposure limits.
- 5.3.9 Maintain an overall awareness of environmental conditions and the contributing factors for development of protective action recommendations in accordance with EPIP-AD-19.
- 5.3.10 Evaluate dose projections and field data.
- 5.3.11 Assist the Emergency Response Manager (ERM), the Emergency Director (ED), and the Radiological Protection Director (RPD) in determining protective action recommendations.
- 5.3.12 Communicate frequently with the Radiological Protection Director to confirm the accuracy of input data to the dose projection process.

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- 5.3.13 As necessary, establish and maintain communication with other Emergency Response Organization Directors and Off-Site Authorities.
- 5.3.14 <u>IF</u> a radiological release has occurred or is imminent, <u>THEN</u> contact Environmental Inc. (Midwest Lab.) (see KPB Emergency Telephone Directory for phone number) and make arrangements for conducting soil/vegetation/water/snow deposition sampling and analysis.
 - a. Identify locations where deposition sampling and analysis is needed using EMT field data and dose projection results.
 - b. Perform sampling and analysis using the methodology described in the KNPP "Radiological Environmental Monitoring Manual (REMM)."
 - c. Provide sample analysis results to the State Radiological Coordinator.
- 5.3.15 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.3.16 IF Final Conditions are NOT met (Section 6.0), THEN return to Step 5.3.4.
- 5.3.17 WHEN Final Conditions are met (Section 6.0),
 - 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 ALD.
 - c. Schedule a self-critique with all event participants in the environmental group (all shifts) as soon as possible.
- 5.4 State Radiological Coordinator Liaison (SRCL) shall:
 - 5.4.1 WHEN notified that an Emergency has been declared:
 - a. Report to the Emergency Operations Facility.
 - b. <u>IF</u> a State Radiological Coordinator Liaison has been designated, until released, <u>THEN</u>
 - 1. Assist in the activation of the EOF per EPIP-EOF-02.
 - 2. If appropriate, plan a shift relief per EPIP-AD-05.
 - 3. Assist the designated State Radiological Coordinator Liaison.
 - c. <u>IF</u> a State Radiological Coordinator Liaison has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the State Radiological Coordinator Liaison and continue implementation of this procedure.
 - 5.4.2 Notify the Environmental Protection Director of your assumption of the responsibilities of the State Radiological Coordinator Liaison.

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5.4.3 Obtain and complete "SRCL Initial Action Checklist," Form EPIPF-EOF-04-01.

Note

Assistance may be obtained from other environmental organization members or by requesting the ALD to provide EOF support staff.

- 5.4.4 Ensure radiological information provided by the State Radiological Coordinator is passed to the EPD.
- 5.4.5 Perform an initial core damage assessment.
 - 5.4.5.1 Collect the following values from the plant process computer using Attachment A.
 - Core exit thermocouple reading PPCS Graphic Display #4
 - Containment radiation monitor readings R-40 & R-41 PPCS Point ID G0040G & G0041G

Note

It is not necessary to proceed to Step 5.2 or Step 5.3 of EPIP-TSC-09A. Only the high level core damage assessment is required.

- 5.4.5.2 Go to Step 5.1.4 of EPIP-TSC-09A, "Core Damage Assessment," and determine the appropriate classification of fuel damage using all of the parameters collected in Step 5.4.5.1.
- 5.4.5.3 Provide fuel damage assessment results to the following positions:
 - Technical Support Center Director
 - Environmental Protection Director
 - Dose Projection Calculator

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The SRCL completes Form EPIPF-EOF-08-06 with available information.

- 5.4.6 On a continual basis, monitor plant conditions using the following as a guide:
 - "Plant Emergency Status Report," Form EPIPF-EOF-08-05 (applicable sections from the Eng./Lic. Coordinator)
 - "Radiological Status Report," Form EPIPF-EOF-08-06 (applicable sections from the Dose Projection Calculator and Environmental Monitoring Team Coordinator)
 - Other sources that would provide information to assist the SRC in making decisions concerning public health and safety
- 5.4.7 Transmit information to the SRC by phone as promptly as possible.
- 5.4.8 <u>IF</u> specifically requested by State officials (or EPD), <u>THEN</u> provide written radiological event summaries using Form EPIPF-EOF-08-06 for transmission to those officials by facsimile.
 - a. Complete "Radiological Status Report," Form EPIPF-EOF-08-06 with available information.
 - b. Obtain ERM approval of the completed Form EPIPF-EOF-08-06.
 - c. Inform the EPD that you have completed "Radiological Status Report," Form EPIPF-EOF-08-06, to be transmitted by facsimile to State officials.
 - d. Ensure Form EPIPF-EOF-08-06 is faxed to the State.

Note

If needed, request an extra SRCL to cover the HPN phone.

- 5.4.9 Respond to incoming calls from the NRC over the HPN phone.
- 5.4.10 Support the completion of "Event Notice," Form EPIPF-AD-07-01, and the development of protective action recommendations.
- 5.4.11 If appropriate, plan for shift relief per EPIP-AD-05.
- 5.4.12 IF Final Conditions are NOT met (Section 6.0), THEN return to Step 5.4.4.

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- 5.4.13 WHEN Final Conditions are met (Section 6.0),
 - 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, notes, and other documentation and give them to the ALD.
- 5.5 Engineering/Licensing Support Coordinator shall:
 - 5.5.1 WHEN notified that an Emergency has been declared,
 - a. Report to the Emergency Operations Facility.
 - b. <u>IF</u> an Engineering/Licensing Support Coordinator has been designated, until released, <u>THEN</u>
 - 1. Assist in the activation of the EOF per EPIP-EOF-02.
 - 2. If appropriate, plan a shift relief per EPIP-AD-05.
 - 3. Assist the designated Engineering/Licensing Support Coordinator.
 - c. <u>IF</u> an Engineering/Licensing Support Coordinator has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Engineering/Licensing Support Coordinator and continue implementation of this procedure.
 - 5.5.2 Notify the Emergency Response Manager that you have assumed the responsibilities of the Engineering/Licensing Support Coordinator.
 - 5.5.3 Monitor engineering, operational, and licensing events related to the event for the ERM.

Assistance may be obtained by requesting the ALD to provide EOF support staff.

5.5.4 Ensure status boards are maintained.

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- 5.5.5 Review messages in the "IN" box and:
 - a. Brief the ERM on significant changes, events, and information.
 - b. <u>IF</u> the message should be placed on the status board or flip chart, <u>THEN</u> mark them as "POST <u>location</u>."
 - Operating Status board
 - Environmental Status Board
 - Protective Actions board
 - Flip Chart
 - c. Place the reviewed messages in the "OUT" box.
- 5.5.6 <u>WHEN</u> required by the ERM:
 - a. Review the event classification (EPIP-AD-02).
 - b. Complete "Event Notice," Form EPIPF-AD-07-01, for approval and transmittal to off-site agencies.
 - c. Complete "Plant Emergency Status Report," Form EPIPF-EOF-08-05 (applicable sections).
- 5.5.7 Perform liaison duties between the ERM and the NRC event response team in the EOF.
- 5.5.8 Coordinate the activities of the Emergency Response Facility Communicator EOF for communications with other emergency facilities as appropriate.
- 5.5.9 If appropriate, plan for a shift relief, per EPIP-AD-05.
- 5.5.10 IF Final Conditions are not met (Section 6.0), <u>THEN</u> return to Step 5.5.3.
- 5.5.11 WHEN Final Conditions are met (Section 6.0),
 - 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 ALD.

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5.6 Off-Site Communicator shall:

- 5.6.1 WHEN notified that an Emergency has been declared during off-hours, THEN
 - a. Report to the Emergency Operations Facility.
 - b. IF an Off-Site Communicator has been designated, until released, THEN
 - 1. Assist in the activation of the EOF.
 - 2. If appropriate, plan a shift relief per EPIP-AD-05.
 - 3. Assist the designated Off-Site Communicator.
 - c. <u>IF</u> an Off-Site Communicator has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the Off-Site Communicator and continue implementation of this procedure.
- 5.6.2 Verify the phones needed for the Off-Site Communicator are properly located and functional.

Note

Until turnover of off-site communications is complete, the Control Room or TSC has primary responsibility of the government verification lines. These lines should not be answered unless it is obvious that they are not being answered at the other facilities. <u>IF</u> the line is answered in the EOF prior to official turnover, <u>THEN</u> every effort should be made to reconnect the party on this line with the facility with primary responsibility and in the interim provide the best information available.

- 5.6.3 When directed by the ERM, transfer off-site communications from the Control Room or TSC to the EOF.
 - a. Ensure the Government Verification phone bell switch is ON.
 - b. Contact the Notifier (CR) or Off-Site Communicator (TSC), and obtain a briefing on the status of off-site notification.

Note

Remind the Notifier (CR) or Off-Site Communicator (TSC) to turn the bell switch on the Government Verification phone to the OFF position.

- c. <u>WHEN</u> mutually agreed upon, relieve the Control Room or TSC of off-site notification responsibilities.
- d. Ask the Notifier or Off-Site Communicator (TSC) to fax a copy of all "Event Notice," Form EPIPF-AD-07-01, issued from the Control Room or TSC to the EOF.

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- e. Inform the ERM that the EOF now has responsibility for off-site communications.
- f. Enter the time and date in the log that responsibilities for off-site communications was accepted by the EOF from the TSC or CR.

The State and County Liaisons will establish communications with the Off-Site Communicator at the EOF via commercial phone lines.

- 5.6.4 Contact off-site EOCs and determine the status of their activation.
- 5.6.5 When activated, obtain the following information from the off-site EOCs:
 - Significant State or County concerns, priorities, and actions
 - If appropriate, PAR implementation status
 - Required reports or other information needed from KNPP
- 5.6.6 Review current status board and chronological event sheet entries.
- 5.6.7 <u>WHEN</u> directed by the ERM, perform off-site notifications.
 - a. <u>IF off-site EOCs HAVE</u> been activated, <u>THEN</u> Go To EPIP-EOF-08 and perform notifications.
 - b. <u>IF off-site EOCs have NOT been activated, THEN</u> Go To EPIP-AD-07, Step 5.1 and perform notifications.
- 5.6.8 <u>IF</u> written plant status updates are requested by State or County officials (or ERM), THEN:
 - a. Obtain "Plant Emergency Status Report," Form EPIPF-EOF-08-05 from the Engineering/Licensing Support Coordinator.
 - b. Ensure ERM approves the completed Form EPIPF-EOF-08-05.
 - c. Fax Form EPIPF-EOF-08-05 to the State and County EOCs.

Note

Assistance may be obtained by requesting the ALD to provide EOF support staff.

- 5.6.9 Ensure the EOF status board for off-site conditions is updated on a regular basis. Assistance by the EOF support staff may be requested from the ALD.
- 5.6.10 Record incoming and outgoing *ad hoc* telephone messages on "Telephone Communications Log Sheet," Form EPIPF-EOF-04-02.

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- 5.6.11 <u>WHEN</u> requested, brief the ERM on off-site communications, include the following items:
 - Off-site Communications status
 - Significant State and County concerns, priorities, and actions
 - PAR implementation status
 - State or County requests for status reports (Form EPIPF-EOF-08-05) or other information updates
- 5.6.12 Provide communication support as directed by the ERM.
- 5.6.13 If appropriate, plan for shift relief per EPIP-AD-05.
- 5.6.14 IF Final Conditions are not met (Section 6.0), THEN return to Step 5.6.5.
- 5.6.15 WHEN Final Conditions are met (Section 6.0),
 - a. Ensure that termination or recovery communications are made as directed by the ERM in accordance with Step 5.1.35.a.
 - 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 ALD.
- 5.7 Emergency Response Facility (ERF) Communicator Emergency Operations Facility (EOF) shall:
 - 5.7.1 WHEN notified that an Emergency has been declared,
 - a. Report to the Emergency Operations Facility.
 - b. IF an ERF Communicator EOF has been designated, until released, THEN
 - 1. Assist in the activation of the EOF.
 - 2. If appropriate, plan a shift relief per EPIP-AD-05.
 - 3. Assist the designated ERF Communicator EOF.
 - c. <u>IF</u> an ERF Communicator EOF has <u>NOT</u> been designated, <u>THEN</u> assume the responsibilities of the ERF Communicator EOF and continue implementation of this procedure.
 - 5.7.2 Notify the Engineering/Licensing Support Coordinator of your assumption of the responsibilities of the ERF Communicator EOF.

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- 5.7.3 Review the following items:
 - Master Log Sheets
 - Current Status Board listings
 - Current Chronological Event Sheet listing
 - Any News Statement that may have been generated
- 5.7.4 As directed by the Engineering/Licensing Support Coordinator, monitor the data presented on the PPCS computer, obtaining clarification from the plant, as necessary.
- 5.7.5 Record incoming and outgoing *ad hoc* telephone messages on "Telephone Communications Log Sheet," Form EPIPF-EOF-04-02.
- 5.7.6 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."
- 5.7.7 Confer with the ERM and Engineering/Licensing Support Coordinator on key issues and events.
- 5.7.8 Ensure the ERM and Engineering/Licensing Support Coordinator are kept informed of all key issues/events at the plant. The items listed below are key topics the ERF Communicator EOF should be listening for:
 - Emergency Classification level declared
 - Events that caused the classification to be declared
 - Actions being taken by NMC-KNP to mitigate the event
 - All incidents relating to personnel injury, contamination, or overexposure to radiation
 - Events happening outside the protected area of the plant (i.e., crashes, fires, tower or substation damage)
 - Outside assistance called in (i.e., ambulance, fire department, or Point Beach Nuclear Plant personnel or equipment)
- 5.7.9 If appropriate, plan for shift relief per EPIP-AD-05.
- 5.7.10 IF Final Conditions are not met (Section 6.0), THEN return to Step 5.7.3.

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- 5.7.11 WHEN Final Conditions are met (Section 6.0),
 - 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 ALD.

5.8 **EOF Support Staff** shall:

- 5.8.1 WHEN notified that an Emergency has been declared,
 - a. Report to the Emergency Operations Facility.
 - b. Notify the Administrative Logistics Director of your availability to assume responsibilities of support staff and continue implementation of this procedure as directed by the Administrative Logistics Director.
- 5.8.2 Ensure the PPCS computer and printer are operating properly. Report problems to ALD.
- 5.8.3 Ensure the Recorder's PC is operating properly per instructions on Form EPIPF-EOF-02-01, "EOF Activation Checklist." Report problems to ALD.
- 5.8.4 Assist in activating the EOF in accordance with EPIP-EOF-02.
- 5.8.5 Perform the tasks described in EPIP-EOF-11.
- 5.8.6 <u>WHEN</u> directed by the ALD, provide general EOF support.
- 5.8.7 If appropriate, assist the ALD in plans for shift relief per EPIP-AD-05.
- 5.8.8 <u>IF</u> Final Conditions are not met (Section 6.0), <u>THEN</u> return to Step 5.8.4.
- 5.8.9 <u>WHEN</u> Final Conditions are met (Section 6.0),
 - 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 ALD.

6.0 Final Conditions

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

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7.0 References

- 7.1 EPIP-AD-02, Emergency Class Determination
- 7.2 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.3 EPIP-AD-07, Initial Emergency Notifications
- 7.4 EPIP-AD-15, Recovery Planning and Termination
- 7.5 EPIP-AD-19, Protective Action Guidelines
- 7.6 EPIP-ENV-01, Environmental Monitoring Group Organization and Responsibilities
- 7.7 EPIP-EOF-02, Emergency Operations Facility (EOF) Activation
- 7.8 EPIP-EOF-03, EOF Staff Action for Unusual Event
- 7.9 EPIP-EOF-08, Continuing Emergency Notifications
- 7.10 EPIP-EOF-11, Internal Communication and Documentation Flow
- 7.11 EPIP-EOF-12, Media Center/Emergency Operation Facility/Joint Public Information Center Security
- 7.12 EPIP-TSC-09A, Core Damage Assessment
- 7.13 EPIP-APPX-A-1, Communication System Description
- 7.14 KPB Emergency Telephone Directory
- 7.15 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.16 KPB Nuclear Emergency Public Information Plan
- 7.17 Kewaunee Nuclear Power Plant Emergency Plan
- 7.18 NRC Inspection Report K-87-195
- 7.19 COMTRAK 91-187, Item 10
- 7.20 COMTRAK 96-163

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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 **OA Records**

- Event Notice, Form EPIPF-AD-07-01
- EOF Activation Checklist, Form EPIPF-EOF-02-01
- Plant Emergency Status Report, Form EPIPF-EOF-08-05
- Radiological Status Report, Form EPIPF-EOF-08-06
- SRCL Initial Action Checklist, Form EPIPF-EOF-04-01
- Telephone Communications Log Sheet, Form EPIPF-EOF-04-02

8.1.2 Non-QA Records

None

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Reviewed By	Richard Johnson		Approv	ed By Jerrie	Morlino		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		Te	O Approval Of mporary langes Required		☐ Yes ☑ 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 <u>IF</u> approached by the media during a declared emergency, <u>THEN</u> 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 This is a "Continuous Use" procedure with steps performed in sequence.

3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07-01, should be initiated and in progress to state and local emergency governments within 15 minutes of the emergency level being declared, or as soon as possible without further compromise to plant or public safety.
- 3.2 Verify the bell switch for the Emergency Government Verification Phone is ON.
- 3.3 If an emergency class escalation, de-escalation, change in PAR, termination, or entry into recovery occurs during these notifications, disregard any remaining steps and return to Step 5.1. Begin the appropriate actions and notifications for the new emergency level.

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.

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5.0 Procedure

Event Notice.

	<u>te</u> the State EOC is <u>NOT</u> activated, <u>THEN</u> go to "Initial Emergency Notifications," IP-AD-07.	
5.1 <u>Not</u>	tify the State and County of the Event	Check
5.1.1	Verify that any "Event Notice," Form EPIPF-AD-07-01, received from the SM/ED or ERM has their approval signature, date, and time.	
5.1.2	Complete block 12 of "Event Notice," Form EPIPF-AD-07-01.	
5.1.3	Complete Attachment A, "State and County Event Notification."	
5.2 <u>Fax</u>	Event Notice	
	Note You will receive a confirmation copy of your fax broadcast material and a summary of delivery status at the fax machine in Public Affairs (A2-South West).	
	Note IF a confirmation fax is not received or other problems are encountered with the broadcast fax, THEN additional information on use can be found in the WPS Public Affairs Department Procedure No. 64.1, "Prairie Systems Fax Broadcasting."	
	Note Detailed instructions for the use of the EOF fax machine are contained in "Communication System Description," EPIP-APPX-A-1, Section 5.10.	
5.2.1	Obtain fax cover sheet, Form EPIPF-EOF-08-03, "Fax for Emergency Declaration or Status Updates."	
5.2.2	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."	***************************************
5.2.3	Contact the Point Beach Duty Shift Manager at (920) 755-6247 and notify him that an "Event Notice" has been faxed to him.	
53 Deta	urn Form EPIPE-AD-07-01 to the SM/ED or EPM who approved the	

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<u>Check</u>

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

6.0 Final Conditions

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-AD-07, Initial Emergency Notifications
- 7.7 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 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-EOF-08-03, Fax for Emergency Declaration or Status Updates

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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**

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

8.1.2 Non-OA Records

None

STATE AND COUNTY EVENT NOTIFICATION

Da	te a	nd Time: _			<u>Check</u>		
1.		•	"Event Notice," Form EPIPF-AD-07-01, re heir approval signature, date, and time.	ceived from the SM/ED			
2.	2. Pick up the Dial Select phone and verify the line is clear.						
a. <u>IF</u> someone is using the Dial Select line, <u>THEN</u> state that you have a " PRIORITY 2 " notification. They will clear the line unless they have a " PRIORITY 1 " call.							
	b.		ne states they have a "PRIORITY 1" converted monitor the call until they finish.	rsation, <u>THEN</u> acknowledge their			
3.	<u>W</u>]	<u>HEN</u> the lir	ne is clear, Dial "83-43-53" (agencies to be n	otified).			
	a.	_	ll Select system is not operating, <u>THEN</u> go to ial Phone).	Step 8 (Using Secondary Method	i,		
<u>Nc</u> <u>IF</u>		agency does	s not respond, <u>THEN</u> press # to cancel the ri	nging.			
4.	<u>WI</u>	<u>HEN</u> each p	party acknowledges:				
	a.		y stating: "This is the Kewaunee Nuclear I Nuclear Accident Reporting System (NAF				
	b.	Record the	e 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.						
			r five (5) rings an agency has not answered, in number from the table below.	<u>THEN</u> press the individual's Dial			
			AGENCY	DIAL SELECT #			

AGENCY	DIAL SELECT #	
State EOC	83	
Kewaunee County EOC	43	
Manitowoc County EOC	53	

- WAIT up to five (5) more rings, <u>THEN</u> press the "#" key to cancel ringing.
- <u>IF</u> unable to contact a specific agency, <u>THEN</u> continue with the notification of agencies on the line.

Attachment A EPIP-EOF-08 Rev. AA

Date: JUL 31 2003 CONTINUOUS USE

STATE AND COUNTY EVENT NOTIFICATION

			Check
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 of Wisconsin EOC, plea (Pause to allow message to be read back	•	accuracy."
7.	Say: "Have all agencies received this	s message?" (Wait for Reply.)	
8. <u>IF</u> any agencies did not respond to the Dial Select, <u>THEN</u> complete the State and County Event Notification using the secondary method, commercial phone.			
	AGENCY	COMMERCIAL #	
	State EOC	1 (800) 943-0003	
	Kewaunee County EOC	1 (920) 487-9791	

- 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").

1 (920) 683-4916

d. Say: "(agency name), please read back this message to verify accuracy." (Pause to allow message to be read back.)

10. Return to procedure Step 5.2.

Manitowoc County EOC

Date: JUL 31 2003 CONTINUOUS USE

WISCON	WISCONSIN PUBLIC SERVICE CORP.		No.	EPIP-E	OF-11	Rev.	W
Kewaunee Nuclear Power Plant			Title Internal Communication and Documentation Flow				
Emergency Plan Implementing Procedure		Date	JU	L 31 2003	Page	of 3	
Reviewed By	Bruce Heitzkey		Approv	ed By _J	errie Morlino		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approval Of Temporary Changes Require		□ Yes ☑ No

1.0 Purpose

1.1 This procedure provides instruction for the flow of information and documentation through the EOF and how it will be maintained.

2.0 General Notes

2.1 Generally each EOF position should maintain the logs, records, and documents generated by them at their station until the ALD arranges for long-term storage.

3.0 Precautions and Limitations

3.1 All logs, records, and documents generated over the course of the emergency shall be kept until after emergency reviews or investigations of the emergency are complete.

4.0 Initial Conditions

4.1 This procedure will be implemented when an emergency has been declared at the Kewaunee Nuclear Power Plant and it is directed by the Administrative Logistics Director.

5.0 Procedure

- 5.1 Maintaining Status Boards and Flip Charts EOF Support Personnel
 - 5.1.1 Update the following EOF status boards approximately every 15 minutes or as directed by the ALD, EPD, or Engineering/Licensing Support Coordinator.
 - Operating Status Board
 - Environmental Status Board
 - 5.1.2 Update the Protective Actions board as directed by the ALD or Engineering/Licensing Support Coordinator.

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Kewaunee Nuclear Power Plant	Title Internal Communication and Documentation Flow			
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Note

<u>IF</u> the PPCS computer terminal is not operational, <u>THEN</u> use the Forms found in Appendix B of the EPIPs and complete them by obtaining the information from the ERF Communicator in the TSC. The Forms are:

- Form EPIPF-EOF-11-02, "Operating Status"
- Form EPIPF-EOF-11-03, "Environmental Status Board"
- 5.1.3 Print the PPCS computer terminal screens that match the EOF status boards from the PPCS computer terminal under the following "Graphic Display" screen addresses:
 - #53 Operating Status
 - #54 Environmental Status
- 5.1.4 Transcribe the data obtained from the screens to the appropriate EOF status boards.
- 5.1.5 Place the printouts in the EOF Support Personnel's OUT box for filing.
- 5.1.6 Transcribe information that is marked "POST" by the Engineering/Licensing Support Coordinator to the appropriate status board or Flip Chart sheet.
- 5.1.7 Provide recommendations to the Engineering/Licensing Support Coordinator to post any other significant plant or ERO activities/events.
- 5.1.8 Number each Flip Chart sheet.
- 5.2 <u>Distributing New Messages EOF Support Personnel</u>
 - 5.2.1 Distribute To Addressee:
 - a. <u>IF</u> action is required, <u>THEN</u> hand it directly to the addressee who needs to take the action.
 - b. <u>IF</u> the information is for informational purposes, <u>THEN</u> place it in the addressee's IN box.
 - 5.2.2 Pick up all messages from all OUT boxes:
 - a. Messages from EOF staff members should be placed in the ERM's IN box.
 - b. Messages from the ERM's and ENGLI's OUT boxes that are marked "POST" should be placed in the IN box of the Support Person maintaining the status boards (Step 5.1).
 - c. Other messages from the ERM's OUT box should be placed in the IN box of the Support Person generating the Master Log.

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Kewaunee Nuclear Power Plant	Title	e Internal Communication and Documentation Flow		
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d. Messages that have been posted should be placed in the IN box of the Support Person generating the Master Log (Step 5.3).

5.3 <u>Master Log - EOF Support Personnel</u>

- 5.3.1 Collect all "News Statements" and make a copy for each clip board.
- 5.3.2 Create an electronic master log.
- 5.3.3 Enter all messages in the "Master Log" chronologically.
- 5.3.4 After a full log page is generated or every 30 minutes,
 - a. Make 4 copies of the last log page and latest news statements,
 - b. Two-hole punch them at the top, AND
 - c. Deliver to the IN boxes of the: ERM, SRCL, NRC, State.
- 5.3.5 Place the originals of all messages in a master file.

6.0 Final Conditions

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

- Operating Status, Form EPIPF-EOF-11-02
- Environmental Status Board, Form EPIPF-EOF-11-03
- Flip Chart sheets
- Personal and Master Logs

8.1.2 Non-QA Records

None

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant Emergency Plan Implementing Procedure		No.	EPIP-RET-02	Rev. X	
		Title	In-Plant Radiation	Emergency Team	
		Date	JUL 31 2003	Page 1 of 5	
Reviewed By	Richard Johnson		Approv	ed By Jerrie Morlino	
Nuclear Safety	☐ Yes	PORC Review		Yes SRO Appro	
Related	☑ No	Required		☑ No Changes F	Required 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.

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Kewaunee Nuclear Power Plant	Title	In-Plant Radiation En	nergency Team
Emergency Plan Implementing Procedure	Date	JUL 31 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 <u>In-Plant Radiation Emergency Team (IRET) Activation</u>
 - 5.1.1 <u>WHEN</u> notified of an emergency at KNPP, assemble in the Radiation Protection Office (RPO).
 - 5.1.2 <u>IF</u> the RPO is not habitable, or at the direction of the Radiological Protection Director (RPD), <u>THEN</u> 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."
- 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 <u>IF</u> a radioactive release is imminent or occurring, <u>AND</u> the Technical Support Center/Emergency Operations Facility (TSC/EOF) is <u>NOT</u> activated, <u>THEN</u> complete the following steps:
 - 5.2.5.1 Obtain meteorological conditions from one of the following:
 - a. Plant Information Computer System
 - 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 Software."

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Kewaunee Nuclear Power Plant	Title	In-Plant Radiation Er	Emergency Team	
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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 <u>IF</u> an Alert or higher is declared, <u>THEN</u> issue dosimetry to all on-site personnel, <u>AND</u> 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 <u>WHEN</u> initial issue of dosimetry is completed, <u>THEN</u> 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 <u>WHEN</u> an emergency entry into the RCA is planned, <u>THEN</u> 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."

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Kewaunee Nuclear Power Plant	Title	In-Plant Radiation Emergency Team		
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5.3 <u>In-Plant Radiation Emergency Team Support (IRETS) Personnel</u>

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. <u>IF</u> Potassium Iodide is approved for use, <u>THEN</u> 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."

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Kewaunee Nuclear Power Plant	Title	In-Plant Radiation En	nergency Team
Emergency Plan Implementing Procedure	Date	JUL 31 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 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.		No.	EPIP-I	RET-05	Rev. I	
Kewaunee Nuclear Power Plant			Title Site Boundary Dose Re Controlled Plant Coole			
Emergency Plan Implementing Procedure		Date	π	JL 31 2003	Page 1 of 4	
Reviewed By _R	Richard Johnson		Approv	ed By _J	errie Morlino	
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approval Of Temporary Changes Require	— 103

1.0 Purpose

1.1 This procedure provides instruction for determining the activity release rate from the steam reliefs and the resultant instantaneous dose rates at the site boundary during controlled cooldown of the plant assuming primary-to-secondary leakage in the steam generators and steam release to the environment.

2.0 General Notes

2.1 This procedure is to be used in conjunction with Integrated Plant Emergency Operating Procedure ECA-3.1 and E-1.

3.0 Precautions and Limitations

- 3.1 Uncontrolled steam releases from the steam generators and applicable plume projection procedures can be found in EPIP-RET-02B, "Gaseous Effluent Sample and Analysis" and EPIP-ENV-03C, "Dose Projection Using Rascal Software."
- 3.2 Westinghouse guidance specifies that since the steam releases are controlled, the site boundary dose rate limits of the Offsite Dose Calculation Manual (ODCM) are to be followed rather than the emergency limits of Federal Regulation 10CFR100.
- 3.3 The instantaneous dose rate equations in Section 5.0 of this procedure relate to Equations 2.4 and 2.5 of the ODCM, where:
 - 3.3.1 The default X/Q dispersion factor equals 3.6E-6.
 - 3.3.2 Summation factors are the summation of the Total Body Dose Factors (Ki) and Skin Dose Factors (Li, Mi), listed in Table 2.1 of the ODCM, times the default X/Q. Isotopes Ar-41, Kr-90, and Xe-137 are not included since they do NOT appear in EPIP-RET-02B, Table 2B.1, "Isotope Normalization Factor."
- 3.4 The steam line monitor calibration factors are taken from EPIP-RET-02B which is based on Fluor's evaluation performed under DCR 844, Task #965 (KPS-6266) of 3/16/81.

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.

WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-RET-05	Rev. I
Kewaunee Nuclear Power Plant	Title Site Boundary Dose Rates Du Controlled Plant Cooldown		
Emergency Plan Implementing Procedure	Date	JUL 31 2003	Page 2 of 4

5.0 Procedure

- 5.1 Obtain the following information from the TSC or Control Room:
 - 5.1.1 Reactor Trip time.
 - 5.1.2 Steam release flow rate (cc/sec) from EPIP-TSC-08A, "Calculations for Steam Release from Steam Generators."
 - 5.1.3 Steam line monitor readings from:
 - R-31 1A Steam Line LO (mR/hr)
 - R-32 1A Steam Line HI (R/hr)
 - R-33 1B Steam Line LO (mR/hr)
 - R-34 1B Steam Line HI (R/hr)
- 5.2 Using the following table, determine the correct steam line monitor calibration factor based on time since Reactor Trip:

TIME SINCE REACTOR TRIP	STEAM LINE MONITOR CALIBRATION FACTOR <u>µCi/cc</u> R/hr
0 hours	14.5
1 hour	16.7
2 hours	20.3
4 hours	30.4
8 hours	67.9
1 day	887.0
1 week	3.08E + 4
1 month	1.93E + 4

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Kewaunee Nuclear Power Plant	Title	Site Boundary Dose Rates During Controlled Plant Cooldown		
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5.3 Calculate the activity release rate as follows:

HIGHEST MONITOR READING	STEAM LINE MONITOR CAL. FACTOR	STEAM RELEASE FLOW RATE	1.06E-6	=	Ci/sec
R/hr	<u>µCi/cc</u> R/hr	cc/sec	Ci/µCi		
x	x	x	1.0E-6	=	

5.4 Insert the activity release rate (Ci/sec) into the following equation to calculate the instantaneous total body dose rate at the site boundary:

- 5.5 The ODCM 3.4.1.a limit is 500 mRem/yr for the total body instantaneous dose rate.
- 5.6 Determine the dose rate to the skin as follows:

5.7 The ODCM 3.4.1.a limit is 3,000 mRem/yr for the instantaneous dose rate to the skin.

6.0 Final Conditions

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

WISCONSIN PUBLIC SERVICE CORP.		EPIP-RET-05	Rev. I
Kewaunee Nuclear Power Plant	Title	Rates During Idown	
Emergency Plan Implementing Procedure	Date	JUL 31 2003	Page 4 of 4

7.0 References

- 7.1 KNPP Offsite Dose Calculation Manual
- 7.2 EPIP-RET-02B, Gaseous Effluent Sample and Analysis
- 7.3 IPEOP ECA-3.1, SGTR With Loss of Reactor Coolant Subcooled Recovery Desired
- 7.4 EPIP-TSC-08A, Calculations for Steam Release from Steam Generators
- 7.5 EPIP-ENV-03C, Dose Projection Using Rascal Software

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**

• EPIP-RET-05 Procedures, Completed

8.1.2 Non-QA Records

None

WISCON	ISIN PUBLIC SER	VICE CORP.	No.	EPIP-S	SEC-02	Rev	. Z
Kewaunee Nuclear Power Plant		Title Security Force Response to Eme			ergencies		
Emergency Plan Implementing Procedure		Date	JUL 31 2003		Page	1 of 24	
Reviewed By	Bryan Gagnon		Approv	ed By	errie Morlino		
Nuclear Safety Related	□ Yes ☑ No	PORC Review Required		□ Yes ☑ No	SRO Approval Temporary Changes Requ		☐ Yes ☑ No

1.0 **Purpose**

This procedure provides instruction for Security Force actions in the event of a declared 1.1 emergency at the Kewaunee Nuclear Power Plant (KNPP).

2.0 **General Notes**

2.1 Instructions from SDP-51 (Security Force Duties) will be placed in packets at key locations - CAS, SAS, Security Shift Manager's office, and all posts for guidance for all Security Force Members (SFM).

Precautions and Limitations 3.0

- 3.1 IF the plant emergency is caused by a security event, or should a security event occur during a plant emergency, THEN the Contingency Plan and Security Implementing Procedures have priority over the actions in this procedure.
- 3.2 After declaration of a plant emergency, all Security Force Members shall wear dosimetry as directed by EPIP-SEC-04, "Security Force Actions for Dosimetry Issue."
- 3.3 IF the Security Building is declared uninhabitable, THEN ensure an adequate level of security effectiveness is maintained.
- 3.4 Ensure all vehicles designated for off-site use have their gas tanks topped off.

4.0 **Initial Conditions**

4.1 The Security Force shall implement this procedure upon declaration of a plant emergency.

5.0 **Procedure**

- 5.1 **Site Protection Director (SPD)** shall:
 - 5.1.1 When a siren is sounded, immediately implement EPIP-SEC-03, "Personnel Assembly and Accountability."
 - 5.1.2 For any announced Unusual Event, Alert, Site Emergency, or General Emergency, ensure that the Secondary Alarm Station (SAS) has immediately dispatched a Security Force Supervisor to the Control Room to act as the Notifier.

WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-SEC-02	Rev. Z
Kewaunee Nuclear Power Plant	Title	Security Force Response to Emergence	
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- 5.1.3 Contact the Radiation Protection Director (RPD) to obtain information on any controlled or potentially hazardous areas.
- 5.1.4 Notify the Support Activities Director (SAD) of the need for any search and rescue operations as determined by personnel accountability.
- 5.2 <u>IF</u> the event is an Alert or higher, <u>THEN</u> the Security Shift Manager shall:
 - 5.2.1 Set up the TLD and dosimeter issue station per EPIP-SEC-04.
 - a. Issue dosimetry to all Security Force Members.
 - b. Ensure dosimetry is issued to all incoming personnel.
 - 5.2.2 Designate a SFM for response to areas within the site boundary as determined to be necessary. The **designated Officer** shall:
 - a. Obtain a TLD and dosimeter.

Note

NO OTHER INFORMATION SHOULD BE GIVEN BEYOND THE SCOPE OF THIS STATEMENT.

b. Inform members of the general public found on-site that they must leave the area by using the following statement:

"The plant site has been temporarily closed and you are requested to leave. Please do so at this time."

- c. Inform KNPP contracted workers on-site and outside of the protected area of the emergency level declared and to report to the Security Building or the Simulator Training Building for assembly.
- d. Make a tour of the following areas as necessary to ensure all personnel are responding to the emergency siren:
 - Met Towers
 - Sewage Treatment Plant
 - Warehouse 1
 - Substation (external)
- 5.2.3 Call in additional Security Force Members as necessary to augment the normal shift complement.

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- 5.2.4 <u>IF</u> plant personnel are to be evacuated per EPIP-SEC-05, "Personnel Evacuation," THEN assist the Site Protection Director (SPD) in the evacuation.
- 5.2.5 Divide ingress into the plant according to the following:
 - 5.2.5.1 Until radiological conditions prohibit, the following personnel (Priority 1) shall proceed directly to the Security Building and will be expedited into the plant ahead of other Emergency Response Organization (ERO) personnel using appropriate latitude allowed by the Security Manual (i.e., 10CFR50.54 x and y).
 - a. Fire Team Members listed in KPB Emergency Telephone Directory
 - b. All directors and alternates listed in KPB Emergency Telephone Directory
 - c. Notifiers and communicators as listed in KPB Emergency Telephone Directory
 - d. NRC Resident Inspector
 - 5.2.5.2 Until radiological conditions prohibit, all ERO personnel arriving from off-site shall proceed directly to the Security Building. Entry into the plant shall follow normal entry procedures, except all Priority 1 personnel shall be expedited past other personnel.

Note

<u>IF</u> off-site non-NMC/WPSC emergency assistance (i.e., ambulance driver) arrives on-site, <u>THEN</u> they should be expedited into the plant.

- 5.2.5.3 IF any personnel who are not emergency responders are found or arrive on-site, THEN inform them to leave the site per Step 5.2.2.b or report to an assembly area per Step 5.2.2.c. Members of the media should be directed to Joint Public Information Center (JPIC) in Green Bay and given (920) 433-1400 or (800) 838-6192 to call for information.
- 5.2.6 <u>IF</u> the SPD requests site boundary control to be established further out then the Protected Area (PA) boundary, <u>THEN</u> proceed as follows:
 - 5.2.6.1 Establish new boundaries.
 - 5.2.6.2 <u>IF</u> any public roads are within the boundaries, <u>THEN</u> contact the appropriate County Sheriffs' Department for assistance.
 - 5.2.6.3 Establish where dosimetry should be issued and turned in.
 - 5.2.6.4 Establish recommended traffic flow into and out of the new controlled area.

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- 5.2.6.5 Special consideration is appropriate for Priority 1 personnel responding to a pager activation.
- 5.2.6.6 Establish roadblocks with appropriate traffic flow directions USING DESIGNATED SFMs AS APPROPRIATE.
- 5.2.6.7 Move dosimetry issue in a coordinated effort with the roadblocks.
- 5.2.6.8 Personnel identification at roadblocks shall be accomplished by using Plant Access lists, personal recognition, plant key card, or other picture I.D., as appropriate.
- 5.2.7 <u>IF</u> the Security Building is declared uninhabitable, <u>THEN</u> proceed as follows:
 - 5.2.7.1 Security Operational and Administrative functions shall be moved to and directed from another location chosen in conjunction with the SPD, Emergency Director (ED), and RPD.
 - 5.2.7.2 The Security Shift Manager shall designate a SFM to obtain the following items for transport to the location chosen in Step 5.2.7.1:
 - a. Emergency key cards
 - b. Keys for the SAS and Armory
 - c. All additional security portable radios, spare batteries, and chargers
 - d. Necessary Contingency Equipment
 - 5.2.7.3 Direct Central Alarm Station (CAS) to take over all security functions normally considered primary Secondary Alarm Station (SAS) functions and CAS shall disable SAS.

6.0 Final Conditions

6.1 None

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7.0 References

- 7.1 EPIP-AD-07, Initial Emergency Notifications
- 7.2 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.3 EPIP-SEC-04, Security Force Actions for Dosimetry Issue
- 7.4 EPIP-SEC-05, Personnel Evacuation
- 7.5 NAD-02.10, Responsibilities Under a Fire Emergency
- 7.6 SDP-51, Security Force Member Duties During a Declared Emergency

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

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate all of your SMS and CCTV equipment to ensure we are NOT in a Security Event.
- 1. Start the Emergency Accountability Program on the SMS (begin emergency) no earlier than TWO minutes after the siren has sounded.
- 2. WHEN the program operation is confirmed, via the word EMERGENCY flashing on the CRT, read aloud two times over the Gai-tronics the message below:
 - "Attention all personnel. Emergency accountability has been initiated. All badged personnel who are assembled shall swipe their key card in the SMS Accountability Card Reader NOW. Any personnel <u>NOT</u> in an assembly area should ensure their supervisor or director is informed of their status."
- 3. Conduct a radio check with all Security personnel to ensure accountability of the Security Force. Notify the Security Shift Manager of your results.
- 4. When initial accountability is complete, end the Emergency Program on the SMS.
- 5. Document all Gai-tronics announcements on paper other than the CAS Activity Log (CAL).
- 6. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

Attachment A EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate all of your SMS and CCTV equipment to ensure we are NOT in a Security Event.
 - 1. IF notified by the Shift Manager/ED of a declared emergency, <u>THEN</u> the SAS operator shall:
 - a. Immediately dispatch a Security Force Officer to the Control Room to act as the Security Notifier.
 - b. Inform the Security Shift Captain of the declared event.
 - c. Initiate all-call to ensure onsite Security staff is aware of the event.
 - d. Inform Security Shift Captain if personnel assembly is required.

Note

If Shift Manager/ED has not contacted SAS within 5 minutes of declaration, call the Shift Manager to request direction on activation of the ERO.

- e. Activate the pagers as directed by the Shift Manager/ED to notify the ERO to respond to their emergency response facility.
- f. Verify Shift Manager/ED has directed the envelope to use which contains the pager access code and pager message code to activate ERO pagers per the ERO Event Notification form. (Attachment B to EPIP-AD-07).
- g. Complete the ERO Event Notification form.
- 2. Obtain a list of Accountability Area Coordinators (See ETD 01A, "Kewaunee Emergency Response Organization (ERO) Call List").
- 3. Call-in one person from each Accountability Area and circle the name of the person contacted.

Note

During normal business hours, call them on the Gai-tronics to ensure they assume their duties.

- 4. After 5 minutes generate an emergency report.
- 5. Ten minutes into the initial accountability generate an emergency report every minute until accountability is complete <u>OR</u> as requested.
- 6. Help the Accountability Coordinator when a person is unaccounted for (i.e., run a report on the person who is unaccounted for).
- 7. Continue to monitor all SMS and CCTV equipment to ensure security is maintained.
- 8. Support additional report requests from the MAC.
- 9. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

Attachment B EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
- 1. No additional duties.
- 2. Remain posted unless health conditions arise. Report those conditions to the Security Shift Manager.

Attachment C EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
 - 1. Respond to the Control Room.
 - 2. Start notifier duties.
 - 3. When relieved, report to the Security Shift Manager.
 - 4. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

Attachment D EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
 - 1. Report to the Security Building and assume lane search duties.
 - 2. Set up the dosimetry issue station per EPIP-SEC-04 only if the declared emergency is at the "alert" status or higher.
 - 3. If the SMS is offline, log all personnel in on PA/VA logs and the emergency check-in sheets located with the MACC. See EPIP-SEC-03, Step 5.4.1 for more information.

Attachment E EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- On the Emergency/Drill siren, evaluate the situation to ensure we are NOT in a Security Event.
 - 1. Obtain the EPIPS binders (3 total), the PCS telephone, the FFD clipboard, FFD keys from SAS and turn on the intoxilizer. Report to the visitor counter.

Note

Have the first non-emergency response person (badged person only) take over the dosimetry issue at the entrance turnstile area.

- 2. Ensure accountability is being performed (SMS Emergency Program started). Document the start and completion of initial accountability. NOTE: The Security Shift Manager assumes the duties of the MAC and SPD until the designated persons arrive.
- 3. Ensure NO tours are being suspended.
- 4. Ensure the Dosimetry Issue Station is set up at the entrance turnstyle area.
- 5. Ensure the site is clear of the public. Ensure the gas tanks are filled on the three (3) designated WPS vans used for emergency purposes. The extra keys are kept in SAS. Notify the Kewaunee Sheriff Dept. when OCA clearing problems exist.
- 6. Conduct accountability on any visitors on-site (EPIP-SEC-03, Steps 5.2.3 and 5.2.4).
- 7. Give safe route map (with SPD/RPD guidance) to all persons exiting the site. The map is located in the EPIP binder (Figure EPIPFG-SEC-05-01).
- 8. Upon evacuation decision, ensure the collection of dosimetry of all persons exiting the site and key cards for disabling (EPIP-SEC-05).
- 9. Update SFMs as to the current/changing conditions as often as possible.

Attachment F EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
- 1. No additional duties.
- 2. Should health conditions arise, report those conditions to the Security Shift Manager.

Attachment G EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
 - 1. If on assigned tour, complete tour.
 - 2. Report to HP and pick up dosimetry for yourself, Post 6 (SSS), Post 2 (SAS), Post 14 (Visitor Counter), and all OCA SFMs.
 - 3. If evacuation is required via the Sallyport, respond as directed by the Security Shift Manager.

Attachment H EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are NOT in a Security Event.
 - 1. Report to HP and pick up and issue dosimetry for yourself and the following posts:

Post 1 - CAS

Post 11 - D.O.

Post 4 - FIELD SUPERVISOR

Post 3 - Door # 8

Post 7 - HUT 2

Post 8 - HUT 2

Post 10 - IPO

Note

If there is no fire, pick up dosimetry for the watchpersons.

- 2. Should health conditions arise, report those conditions to the Security Shift Manager.
- 3. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

Attachment I EPIP-SEC-02 Rev. Z

- On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
 - 1. Assume the duties of Post 9 until Post 9 has collected and issued the dosimetry for all SFMs in the power block.
 - 2. Should health conditions arise, report those conditions to the Security Shift Manager.
 - 3. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
- 1. No additional duties.
- 2. Respond as directed by the Security Shift Manager.
- 3. Should health conditions arise, report those conditions to the Security Shift Manager.

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
 - 1. No additional duties.
 - 2. Should health conditions arise, report those conditions to the Security Shift Manager.

Attachment L EPIP-SEC-02 Rev. Z

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
- 1. No additional duties.
- 2. Assist Post 5 with security building duties.
- 3. Assist the Security Shift Manager as needed.
- 4. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

Notification to the EP Group must be made if changes are made to any Post Duties.

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
- 1. When directed, restrict site access to only ERO members or approved emergency personnel.
- 2. Verify ERO personnel against the ETD 01A (ERO Call List) List is located in Post #18's shift binder.
- 3. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.
- 4. Should health conditions arise, report those conditions to the Security Shift Manager.

Attachment N EPIP-SEC-02 Rev. Z

Notification to the EP Group must be made if changes are made to any Post Duties.

- On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
 - 1. Use the public address system on the security vehicle and make the following announcement to the general public found on-site:

NO OTHER INFORMATION SHOULD BE GIVEN BEYOND THE SCOPE OF THIS STATEMENT.

"The plant site has been temporarily closed and you are requested to leave. Please do so at this time."

- 2. Inform contractors working in the OCA of the emergency level declared and to report to the Simulator Training Facility or the Security Building for assembly.
- 3. Tour entire OCA to include the following:

Met Towers Sewage Treatment Plant Warehouse # 1 Substation (external)

Ensure all personnel in these areas are responding to the emergency siren. Remain cognizant of all personnel outside of the PA who remain on-site.

- 4. Ensure gas tanks are topped off on the 3 designated WPS vans. These keys have pagers attached and are located at visitor counter. If the vans are in use, once all pagers have been activated, personnel will return the vans to security.
- 5. Stop at the security building and pick up dosimetry for all of the OCA personnel.
- 6. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

Attachment O EPIP-SEC-02 Rev. Z

POST 20 // 21

Notification to the EP Group must be made if changes are made to any Post Duties.

- On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
 - 1. Assist Posts 18 or 19 as needed.
 - 2. Should health conditions arise, report those conditions to the Security Shift Manager.
 - 3. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

Attachment P EPIP-SEC-02 Rev. Z

POST 22 // 52

- ** On the Emergency/Drill siren, evaluate the situation to ensure we are <u>NOT</u> in a Security Event.
- 1. Respond as directed by the Security Shift Manager.
- 2. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

- ** On the Emergency/Drill siren, if the event requires Fire Brigade response you shall assume your Fire Brigade duties.
- 1. If the event does <u>NOT</u> require fire brigade response, continue performing fire check duties.
- 2. Should health conditions arise, report those conditions to the Security Shift Manager.
 - If responding to a fire, leave the fire check clipboard in CAS.

- ** On the Emergency/Drill siren, if the event requires Fire Brigade response you will be relieved by Post 5 so that you can assume your Fire Brigade duties.
- 1. If the event does <u>NOT</u> require fire brigade response, remain at lane search and control access through the search equipment. Ensure only Emergency Response Organization personnel are allowed into the protected area. All others shall be instructed to report upstairs to Classroom "C". If unsure if the person is ERO personnel, refer to ETD 01A (ERO Call List).
- 2. Set up the ribbon and table for the dosimetry issue station and route all personnel accordingly.
- 3. Assist in dosimetry issue until otherwise directed by the Security Shift Manager.
- 4. Direct all media questions to the JPIC in Green Bay at (920) 433-1400 or (800) 838-6192 for information.

ISIN PUBLIC SER	VICE CORP.	No.	EPIP-7	rsc-08B	Re	v. H
Kewaunee Nuclear Power Plant Emergency Plan Implementing Procedure		Title STMRLS Computer Progra			Program	
		Date	JU	JL 31 2003	Pag	e 1 of 3
John Helfenberger		Approv	ed By _J	errie Morlino		
☐ Yes	PORC Review		☑ Yes	Temporary		☑ Yes
	nunee Nuclear Por ey <i>Plan Implement</i> John Helfenberger	John Helfenberger Yes PORC Review	Title Ty Plan Implementing Procedure John Helfenberger PORC Review	Title STMR Ty Plan Implementing Procedure John Helfenberger Yes PORC Review Title STMR Approved By J	Title STMRLS Computer Figure Plant Ty Plan Implementing Procedure John Helfenberger PORC Review Title STMRLS Computer Figure STMRLS Computer Figure Figu	Title STMRLS Computer Program Ty Plan Implementing Procedure Date JUL 31 2003 Pag John Helfenberger Approved By Jerrie Morlino Yes PORC Review Title STMRLS Computer Program Pag Approved By Jerrie Morlino Yes SRO Approval Of Temporary

1.0 Purpose

1.1 This procedure provides instruction for tracking revisions to the steam release program software for historical reasons.

2.0 General Notes

2.1 This program can be used in conjunction with EPIP-TSC-08A, "Calculations for Steam Release from Steam Generators," whenever a steam release calculation is needed in support of emergency efforts during a declared emergency at the Kewaunee Nuclear Power Plant.

3.0 Precautions and Limitations

3.1 None

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 The Lead Plant Reactor Engineer is responsible for the following:
 - 5.1.1 Ensuring that all changes to this procedure are accomplished in accordance with GNP-03.01.01, "Directive and Procedure Administrative Controls."
 - 5.1.2 Ensuring the requirements of RE-27, "Control of Computer Codes," for the STMRLS Program are met.
 - 5.1.3 Ensuring program disks are distributed in the proper locations.
 - 5.1.4 Ensuring the requirements of NAD-05.23, "Computer Software Management Program," are met for the STMRLS Computer Program.
- 5.2 The STMRLS Program shall be controlled after initial approval by RE-27 as a "Safety Related" Program and shall be reviewed annually to ensure the program is up-to-date.
- 5.3 Changes to the STMRLS Program shall be made in accordance with Section 4.2, "Computer Code Revisions," of RE-27.

WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-TSC-08B	Rev. H
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- 5.4 All documentation concerning a STMRLS Program revision shall be kept in the STMRLS Programmer/User's Manual.
- 5.5 All program disks, with the exception of the master disk (which is kept in the Reactor Engineering file), shall be compiled by the IT Group. Reactor Engineering personnel will verify the accuracy of the RUN-ONLY code by comparing the results from the code to the existing benchmark. This shall be done before the copies are distributed.
- 5.6 Program disks shall be labeled by the Lead Plant Reactor Engineer with the following information:

EPIP-TSC-08B - STMRLS Computer Program

Date:	October 2, 1990	-
Revision:	<u>A</u>	
Copy Number	r:	

5.7 Executable copies of the program are distributed by the IT Group as follows:

COPY NUMBER	LOCATION			
NA	N:\steamr10\STMRLS			
1 & 3	TSC SAM Room - Cabinet One			
4	MASTER NPM Trailer - Information Technology Group Master File			

6.0 Final Conditions

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

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7.0 References

- 7.1 STMRLS Programmer/User's Manual
- 7.2 EPIP-TSC-01, Technical Support Center Organization and Responsibilities
- 7.3 EPIP-TSC-08A, Calculations for Steam Release from Steam Generators
- 7.4 RE-27, Control of Computer Codes
- 7.5 NAD-05.23, Computer Software Management Program

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 **OA Records**

None

8.1.2 Non-QA Records

None

WISCON	ISIN PUBLIC SER	VICE CORP.	No.	EPIP-7	TSC-10	Rev. L
Kewaunee Nuclear Power Plant Emergency Plan Implementing Procedure		Title	PEOPs			
		Date	JU	TL 31 2003	Page 1 of 15	
Reviewed By	Dave Lohman		Approv	ed By _J	errie Morlino	
Nuclear Safety	☐ Yes	PORC Review		☐ Yes	SRO Approval O Temporary	f ☑ Yes
Related	☑ No	Required		☑ No	Changes Require	ed 🛘 No

1.0 Purpose

1.1 This procedure provides instruction for technical guidance to Severe Accident Management Operations (SAMOPs) and Technical Support Center staff members during implementation of the Kewaunee Nuclear Power Plant (KNPP) Integrated Plant Emergency Operating Procedures (IPEOPs).

2.0 General Notes

- 2.1 This procedure applies to steps in the IPEOPs that require consultation with the Plant Technical Support Engineering staff.
- 2.2 Amplifying information for most steps can be found in the IPEOP background documents.

3.0 Precautions and Limitations

- 3.1 This procedure should only be used as a guide to the Technical Support staff. Plant parameters should be monitored to determine plant conditions prior to implementation of these guidelines.
- 3.2 Shift Manager and Event Operations Director approval is required to activate the Post-Accident Leakage Control System.
- 3.3 IPEOP implementation may lead to violation of plant Technical Specifications. The NRC must be notified of any violation per 10CFR50.54(x).

4.0 Initial Conditions

4.1 This procedure is used during a declared emergency when plant conditions require assistance by the Technical Support staff in the execution of IPEOPs.

WISCONSIN PUBLIC SERVICE CORP.	No.	EPIP-TSC-10	Rev. L
Kewaunee Nuclear Power Plant	Title	Title Technical Support for IPEOPs	
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5.0 Procedure

- 5.1 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT
 - 5.1.1 Evaluate Plant Status (IPEOP Step 17):
 - a. This step instructs the operator to consult Technical Support staff to determine if E-MDS-30, Post-Accident Leakage Control System, should be implemented.
 - 1. Post-Accident Leakage Control System is actuated if Auxiliary Building radiation levels are increasing or significant core damage has occurred.
 - 2. Procedure E-MDS-30 should be implemented at this time because the procedure requires local actions which may be prohibited following transfer to Containment sump recirculation due to high radiation levels.
 - b. Chemistry is contacted to:
 - 1. Start up the Containment Hydrogen Monitoring System (EPIP-RET-03C).
 - 2. Obtain primary and secondary samples per other EPIPs.
- 5.2 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT
 - 5.2.1 Request a dose projection on steaming steam generators from the Technical Support Staff (IPEOP Step 21):
 - a. <u>IF</u> a large break LOCA has occurred, <u>THEN</u> the secondary side may still be relatively hot and at a pressure significantly higher than the Reactor Coolant System (RCS).
 - b. <u>IF</u> this is the case, <u>THEN</u> the operator should attempt to cooldown and depressurize the steam generators.
 - A dose projection is requested to be performed, per EPIP-RET-05.
 Radioactivity may have accumulated in the steam generators due to
 small leaks existing prior to the LOCA. Radiation remains in the steam
 generators despite any secondary-to-primary back leakage that may
 have occurred.

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5.3 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

- 5.3.1 Determine if Reactor Vessel Head Should Be Vented (IPEOP Step 22):
 - a. The possibility exists for a noncondensable bubble to form in the reactor vessel head region during certain LOCA events.
 - 1. This exists whenever saturation conditions exist in the vessel head or gas is injected into or generated within the RCS.
 - 2. The reactor vessel head might have to be vented using the Reactor Vessel Head Vent System to prevent the bubble from growing to the extent that core cooling flow is adversely affected.
- 5.3.2 Identify Growth of a Void in the Vessel:
 - a. Monitor Reactor Vessel Liquid Inventory System (RVLIS) for void growth. RVLIS is the primary means of determining if voids exist.
 - b. In addition to RVLIS, other indirect indications of voids in the RCS are listed below.
 - 1. Pressurizer level response to RCS pressure changes may not be normal if voids exist in the RCS.
 - a) Pressurizer Level may decrease during a RCS pressurization due to void compression or condensation.
 - b) Pressurizer Level may rise rapidly during a spraying operation due to void expansion or generation.
 - 2. If reactor vessel head temperature is equal to or greater than saturation temperature, a steam bubble has been generated in the reactor vessel head.
 - 3. Noncondensable voids in the RCS may occur after either a complete SI accumulator tank discharge or an inadequate core cooling condition.
 - c. <u>IF</u> a steam void is formed during post-LOCA cooldown and depressurization or during a steam generator tube rupture recovery, <u>THEN</u> no attempt should be made to condense the void through repressurization.
 - 1. Only RXCP restart or continued cooling from CRDM fans should be used.
 - 2. Refer to IPEOP FR-I.3 and Section 5.27 of this procedure.

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5.4 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

- 5.4.1 Consult with Emergency Director for Additional Recovery Actions (IPEOP Step 23):
 - a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air.
 - 1. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
 - b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

5.5 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

- 5.5.1 Evaluate Long-Term Plant Status (IPEOP Step 24):
 - a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.
 - b. Actions must be taken to adjust recirculation sump pH to between 8 and 10.5 within 48 hours of the start of the leak to prevent component stress corrosion cracking.

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5.6 IPEOP ES-1.2: POST-LOCA COOLDOWN AND DEPRESSURIZATION

- 5.6.1 Check if RHR System Should Be Placed in Service (IPEOP Step 24):
 - a. The RHR System is designed to operate below specific RCS pressure and temperature conditions (RCS hot leg temperature less than 400°F and RCS pressure less than 425 psig). Depending on the size of the break, different actions should be taken.
 - 1. For smaller breaks, the SI pumps will have been stopped in most cases and most of the RWST water will still be available by the time the RHR System entry criteria are satisfied.
 - a) For these cases, the RHR System could be placed in service with the RHR pumps taking suction from the hot legs.
 - b) Any high-head pump left running would remain aligned in the cold leg injection mode taking suction from the RWST.
 - c) When charging flow is established, the injection source is also from the RWST.
 - 2. For larger breaks, the RWST level will eventually decrease to the recirculation transfer setpoint and at least one RHR pump must be used for containment sump recirculation.
 - a) <u>IF</u> the RHR System is not placed in service, <u>THEN</u> the system can remain in the long-term recirculation mode with the core residual heat being dissipated through the safeguards (RHR) heat exchangers.

5.6.2 Consider These Three Important Factors:

- a. The RWST (or alternate) source of injection (make-up) water must be available for operating high-head SI, charging pumps, and RHR in split-train operation.
- b. Confirmation of system availability, including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction, must take place before RHR operation can begin.
- c. Auxiliary building radiation levels should be evaluated.
 - 1. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event.
 - 2. Care should be taken to minimize the spread of radioactive fluid through the CVCS system, if possible.
 - 3. Additionally, during a design basis LOCA, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hr or more due to "shine" from the containment building.

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5.7 IPEOP ES-1.2: POST-LOCA COOLDOWN AND DEPRESSURIZATION

- 5.7.1 Consult with Emergency Director for Additional Recovery Actions (IPEOP Step 25):
 - a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air.
 - 1. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
 - b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

5.8 IPEOP ES-1.2: POST-LOCA COOLDOWN AND DEPRESSURIZATION

- 5.8.1 Evaluate Long-Term Plant Status (IPEOP Step 27):
 - a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term.
 - 1. <u>IF</u> the SI pumps were stopped, <u>THEN</u> RCS subcooling would have been restored and RCS circulation flow should have been adequate to prevent boron precipitation.
 - 2. The transfer of hot leg recirculation would probably not be needed for the smaller breaks where SI flow was reduced.

5.9 IPEOP ES-3.1: POST-SGTR COOLDOWN USING BACKFILL

- 5.9.1 Evaluate Long-Term Plant Status (IPEOP Step 12):
 - a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

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5.10 IPEOP ES-3.2: POST-SGTR COOLDOWN USING BLOWDOWN

- 5.10.1 Evaluate Long-Term Plant Status (IPEOP Step 16):
 - a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.11 IPEOP ES-3.3: POST-SGTR COOLDOWN USING STEAM DUMP

- 5.11.1 Evaluate Long-Term Plant Status (IPEOP Step 16):
 - a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.12 IPEOP ECA-0.0: LOSS OF ALL AC POWER

- 5.12.1 <u>IF</u> core exit temperatures are greater than 1200°F and increasing, <u>THEN</u> go to SACRG-1, Severe Accident Control Room Guideline Initial Response (IPEOP Step 30).
 - a. The Severe Accident Management Guidelines (SAMGs) are entered from the ERGs by Control Room Operators when core damage occurs.
 - 1. The ERG to SAMG transition uses, as part of the transition criteria, a core exit thermocouple temperature indication of greater than 1200°F to indicate the need to transition from the ERGs to the SAMGs.
 - 2. The 1200°F criteria for transition from the ERGs to the SAMGs is identical to the 1200°F criteria on the Core Cooling Critical Safety Function Status Tree.
 - b. <u>IF</u> the Operator enters this step and core exit TC temperatures are greater than 1200°F and increasing, <u>THEN</u> the Operator should transition to the SAMGs.
 - 1. This condition indicates that all attempts to restore core cooling have failed, core damage cannot be prevented, and the Operator should go to the SAMGs.

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5.13 IPEOP ECA-1.1: LOSS OF EMERGENCY COOLANT RECIRCULATION

- 5.13.1 Consult with Emergency Director to determine if RHR System should be placed in service (IPEOP Steps 23 and 35).
 - a. The RHR System is designed to operate below specific RCS pressure and temperature conditions.
 - 1. <u>IF</u> previous actions to establish conditions were not complete, <u>THEN</u> this step directs the Operator to continue with the procedure for completion of the actions.
 - 2. The plant staff should determine RHR System availability.
 - 3. RHR System availability includes:
 - a) Confirmation of equipment needed for RHR System operation (RHR suction valves, RHR pumps, etc.).
 - b) Confirmation of adequate liquid inventory in the RCS to preclude steam from entering the RHR pump suction.
- 5.13.2 Consult with Emergency Director for Additional Recovery Actions (IPEOP Step 37):
 - a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air.
 - 1. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
 - b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.
- 5.13.3 Consult with Emergency Director (IPEOP Step 38):
 - a. This procedure provides generic instructions for cooldown and depressurization of the plant to atmospheric conditions following a loss of emergency coolant recirculation.
 - b. After the steps have been completed and cold shutdown conditions have been maintained, the Plant Engineering staff has time to evaluate the event and develop recovery procedures so that the Plant can be repaired and brought back to service.

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5.14 IPEOP ECA-2.1: UNCONTROLLED DEPRESSURIZATION OF BOTH SGs

- 5.14.1 Evaluate Long-Term Plant Status (IPEOP Step 43):
 - a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.15 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

- 5.15.1 Consult with Emergency Director (IPEOP Step 14):
 - a. This step instructs the Operator to consult with the Emergency Director when ruptured SG narrow range level exceeds 92%.
 - b. An inability to prevent SG overfill may result from a rupture large enough to require the use of ECA-3.2, "SGTR with Loss of Reactor Coolant Saturated Recovery Desired."

5.16 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

- 5.16.1 Check if RHR System Should Be Placed in Service (IPEOP Step 36):
 - a. The RHR System is designed to operate below specific RCS pressure and temperature conditions (RCS hot leg temperature less than 400°F and RCS pressure less than 425 psig).
 - b. When such conditions are established, the RHR System should be placed in service to complete the cooldown to cold shutdown and provide long-term cooling.
- 5.16.2 Consider These Three Important Factors:
 - a. The RWST (or alternate) source of injection (makeup) water must be available for operating high-head SI, charging pumps, and RHR in split-train operation.
 - b. Confirmation of system availability including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction must take place before RHR operation can begin.

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- c. Auxiliary building radiation levels should be evaluated.
 - 1. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event.
 - 2. Care should be taken to minimize the spread of radioactive fluid through the CVCS System if possible.
 - 3. During some design basis accidents, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hr or more due to "shine" from the containment building.

5.17 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

- 5.17.1 Consult with Emergency Director for Additional Recovery Actions (IPEOP Step 37):
 - a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air.
 - 1. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
 - b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

5.18 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

- 5.18.1 Evaluate Long-Term Plant Status (IPEOP Step 40):
 - a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

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5.19 IPEOP ECA-3.2: SGTR WITH LOSS OF REACTOR COOLANT - SATURATED RECOVERY DESIRED

- 5.19.1 Check if RHR System Should Be Placed in Service (IPEOP Step 28):
 - a. The RHR System is designed to operate below specific RCS pressure and temperature conditions (RCS hot leg temperature less than 400°F and RCS pressure less than 425 psig).
 - b. When such conditions are established, the RHR System should be placed in service to complete the cooldown to cold shutdown and provide long-term cooling.
- 5.19.2 Consider These Three Important Factors:
 - a. The RWST (or alternate) source of injection (make-up) water must be available or operating high-head SI, charging pumps, and RHR in split-train operation.
 - b. Confirmation of system availability including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction must take place before RHR operation can begin.
 - c. Auxiliary building radiation levels should be evaluated.
 - 1. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event.
 - 2. Care should be taken to minimize the spread of radioactive fluid through the CVCS System if possible.
 - 3. During some design basis accidents, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hour or more due to "shine" from the containment building.

5.20 IPEOP ECA-3.2: SGTR WITH LOSS OF REACTOR COOLANT - SATURATED RECOVERY DESIRED

- 5.20.1 Consult with Emergency Director for Additional Recovery Actions (IPEOP Step 29):
 - a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air.
 - 1. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
 - b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

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5.21 IPEOP ECA-3.2: SGTR WITH LOSS OF REACTOR COOLANT - SATURATED RECOVERY DESIRED

- 5.21.1 Evaluate Long-Term Plant Status (IPEOP Step 32):
 - a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.22 IPEOP ECA-3.3: SGTR WITHOUT PRESSURIZER PRESSURE CONTROL

- 5.22.1 Evaluate Long-Term Plant Status (IPEOP Step 37):
 - a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term.
 - 1. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service.
 - 2. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.23 IPEOP FR-S.1: RESPONSE TO NUCLEAR POWER GENERATION/ATWS

- 5.23.1 <u>IF</u> core exit temperatures are greater than 1200°F and increasing, <u>THEN</u> go to SACRG-1, Severe Accident Control Room Guideline Initial Response (IPEOP Step 18).
 - a. The Severe Accident Management Guidelines (SAMGs) are entered from the ERGs by Control Room Operators when core damage occurs.
 - 1. The ERG to SAMG transition uses, as part of the transition criteria, a core exit thermocouple temperature indication of greater than 1200°F to indicate the need to transition from the ERGs to the SAMGs.
 - 2. The 1200°F criteria for transition from the ERGs to the SAMGs is identical to the 1200°F criteria on the Core Cooling Critical Safety Function Status Tree.
 - b. <u>IF</u> the Operator enters this step and core exit TC temperatures are greater than 1200°F and increasing, <u>THEN</u> the Operator should transition to the SAMGs.
 - 1. This condition indicates that all attempts to restore core cooling have failed, core damage cannot be prevented, and the Operator should go to the SAMGs.

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5.24 IPEOP FR-C.1: RESPONSE TO INADEQUATE CORE COOLING

- 5.24.1 Consult with Emergency Director for Additional Recovery Actions (IPEOP Step 7):
 - a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air.
 - 1. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
 - b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.
- 5.24.2 <u>IF</u> core exit TC temperatures increasing <u>AND</u> RXCPs running in all available RCS cooling loops, <u>THEN</u> go to SACRG-1, Severe Accident Control Room Guideline Initial Response (IPEOP Step 19).
 - a. The Severe Accident Management Guidelines (SAMGs) are entered from the ERGs by Control Room Operators when core damage occurs.
 - 1. The ERG to SAMG transition uses, as part of the transition criteria, a core exit thermocouple temperature indication of greater than 1200°F to indicate the need to transition from the ERGs to the SAMGs.
 - 2. The 1200°F criteria for transition from the ERGs to the SAMGs is identical to the 1200°F criteria on the Core Cooling Critical Safety Function Status Tree.
 - b. <u>IF</u> the Operator enters this step and core exit TC temperatures are greater than 1200°F and increasing and all available RXCPs are running, <u>THEN</u> the Operator should transition to the SAMGs.
 - 1. This condition indicates that all attempts to restore core cooling have failed, core damage cannot be prevented, and the Operator should go to the SAMGs.

5.25 IPEOP FR-Z.2: RESPONSE TO CONTAINMENT FLOODING

- 5.25.1 Notify Emergency Director of Sump Level and Activity Level to Obtain Recommended Action (IPEOP Step 3):
 - a. The ED should request evaluation of the cause of the event and provide specific recommendations to the Operators for reducing containment water level.

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- 5.25.2 Consider the Following Three Methods to Reduce Flooding:
 - a. Location of critical plant components in relation to containment sump water level.
 - b. Location, size, and shielding of available storage tanks outside containment.
 - c. Radiation concerns due to pump and line routing from the containment sump to the various storage tanks.

5.26 IPEOP FR-Z.3: RESPONSE TO HIGH CONTAINMENT RADIATION LEVEL

- 5.26.1 Notify Emergency Director of Containment Radiation Level to Obtain Recommended Action (IPEOP Step 3):
 - a. After containment vent isolation has been verified, check the pressurizer water level, charging flow, and operation of the containment sump pumps to determine if a reactor coolant leak is occurring.
 - 1. <u>IF</u> there is a lack of evidence of a reactor coolant leak, <u>THEN</u> verify the alarm condition by selecting the fast advance on the air particulate and sample fresh air for about 15 seconds to confirm that the detector function is normal.
 - 2. IF it is normal, THEN notify the RPD.
 - b. An additional area to be looked at is the possibility of fuel damage. By checking the thermocouple readings, hydrogen generation level, and RCS activity levels, it can be determined whether or not damage to the fuel has occurred.

5.27 IPEOP FR-I.3: RESPONSE TO VOIDS IN REACTOR VESSEL

- 5.27.1 Obtain Maximum Allowable Venting Time from Technical Support Center Director (Per EPIP-TSC-07) (IPEOP Step 17):
 - a. Calculation of the maximum allowable venting time is based on maintaining containment hydrogen concentration below 3% in dry air.
 - 1. The lower the initial hydrogen concentration, the longer the venting can continue.
 - 2. Procedure EPIP-TSC-07 describes the method of determining RCS venting time.

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6.0 Final Conditions

6.1 This procedure may be terminated when the emergency has been closed out or recovery operations have been entered, the plant is stable, and Operations has determined that technical support of IPEOPs is no longer required.

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Integrated Plant Emergency Operating Procedures (KNPP IPEOPs)
- 7.2 KNPP IPEOP Background Documents
- 7.3 Westinghouse Owners Group Emergency Response Guidelines
- 7.4 SAG-7

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

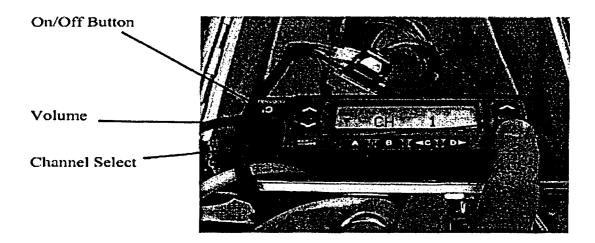
None

ENVIRONMENTAL DISPATCH AREA ACTIVATION CHECKLIST

TE/TIME STARTED/_	
TE/TIME STARTED /	

<u>ITEM</u> <u>ACTION</u> <u>INITIALS</u>

- 1. Arrange tables in Environmental Dispatch Area according to Figure EPIPFG-APPX-A-06-04.
- 2. Obtain communications equipment from the storage closet (Box "C") in the EOF Coordination Center (D2-3) and install according to Figure EPIPFG-APPX-A-06-04.
- 3. Perform radio set up as follows:
 - Pull out the radio, headset, cable, and power cord.
 - Attach the radio cable into the black antenna cable in the wall.
 - Attach power cord (as applicable) and plug into outlet.
 - Attach headset to radio, located on back side by black and red wires (personal preference if you want to use the headset)
 - Turn on the radio, power button located on upper left corner of radio
 - Set channel to EP1, located on right side of radio, up/down arrows
 - Set volume using up/down arrows located on left of radio, above "MON" button
 - Establish radio communications with EMT Field Teams



ENVIRONMENTAL DISPATCH AREA ACTIVATION CHECKLIST

<u>ITEM</u>	<u>ACTION</u>	<u>INITIALS</u>
4.	Obtain ENV forms and figures folder from cabinet in EOF.	
5.	Synchronize the clock in the Environmental Dispatch Area with the time from the Honeywell plant process computer.	
6.	Verify ability to perform a dose projection according to EPIP-ENV-03C.	
7.	Establish communications with at least one EMT using radio or telephone.	
8.	Verify that an EMT is activated according to EPIP-ENV-02.	
9.	Notify ERM that the Environmental Monitoring Group is activated.	
DATE/T	IME COMPLETED/EPD	

Date: JUL 31 2003

EMT STATUS

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I lime lime lime	TEAM:	A	в с	(Circle	One)					
NOTE: EMTs should report their dose every hour or when they receive 100 mREM. Team Member Dose Tracking NAMENAMENAME	DATE/T	IME ACTIV	VATION	COMPLETE	E:	/_				
Team Member Dose Tracking NAMENAMENAME			<u>NOT</u> enter	r areas with ex	tternal dose rate	s > 1R/hr	without	approva	I from either	the
NAMENAMENAME	NOTE:	EMTs should	l report th	eir dose every	hour or when t	hey receiv	e 100 m	REM.		
Time Dosimeter Total Reading TEDE Time Dosimeter Reading TEDE Time Dosimeter Reading TEDE	Team M	ember Dose	Tracking	5						
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EMT STATUS

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EMT ORDERS/FIELD DATA

DATE/TIME/	- wgo - 01 <u></u>
TEAM: A B C (Circle One)	
ORDER ID 1 Establish Center Line and Take Air Sample (Circle One 2 Identify Leading Edge if Applicable) 3 Identify Lateral Edge	
INSTRUCTIONS:	
	

INSTRUCTIONS FOR REPORTING FIELD DATA:

- SAMPLE/DATE/TIME Enter date/time air sample collection was completed, date/time dose rate
 reading was taken, or date/time deposition sample was collected.
- 2. GRID COORDINATES Specify location to the nearest one-half of a grid point.
- 3. **SAMPLE TYPE** Enter appropriate description.

Iodine (I)

Particulate (P)

Noble Gas (NG)

Dose Rate (DR)

Deposition (DP)

4. **READING** - Enter reading using correct units.

Air Sample (iodine, particulate, or noble gas) - μCi/cc

Dose Rate - mrem/hour

Deposition - DPM/100 cm² or DPM/smear, if < 100 cm² was surveyed

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EMT ORDERS/FIELD DATA

Page	of	

EMT FIELD DATA

SAMPLE DATE/TIME	GRID COORDINATES	SAMPLE TYPE (Circle One)	READING (Including Units)
		I / P / NG / DR / DP	
		I / P / NG / DR / DP	
		I / P / NG / DR / DP	
		I / P / NG / DR / DP	
		I / P / NG / DR / DP	
		I / P / NG / DR / DP	
		I / P / NG / DR / DP	
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EMT ACTIVATION CHECKLIST

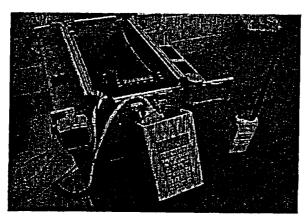
DATE/TIME STARTED:/	TEAM:	Α	В	С	(Circle One)
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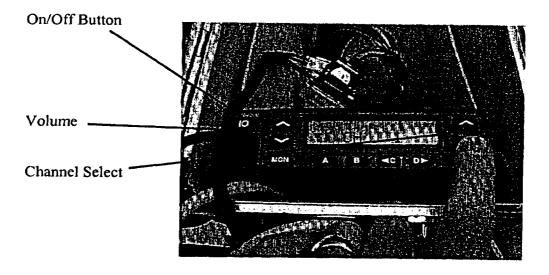
ITEM	ACTION	INITIALS		
1.	Perform portable survey instrument preoperational checks using EPIP-ENV-04A. a. Ion Chamber (Serial #)			
	1) Physical Condition SAT / UNSAT (Circle One) 2) Calibration SAT / UNSAT 3) Battery SAT / UNSAT 4) Zero Instrument SAT / UNSAT 5) Source Response SAT / UNSAT			
	b. ASP-1 with HP-260 probe (Serial #) 1) Physical Condition 2) Calibration 3) Battery 4) Source Response 5) Place in FAST response mode. SAT / UNSAT			
2.	Obtain battery powered air sampler (Model H-810-B2). a. Air sampler serial number: b. Verify air sampler accessories are all available: - Tygon tubing - Gold filter retaining ring - Gold filter housing (2) - Blue cartridge housings (2) - Plastic cartridge seal rings (2)			
3.	Obtain Environmental Monitoring Team Kit. NOTE: IF seal is not broken, THEN do not inventory kit. IF seal is broken, THEN inventory kit using most recent revision of Form HPF-115, Emergency Equipment Monthly Inventory.			
4.	Obtain cellular phone and FAX kit.			

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EMT ACTIVATION CHECKLIST

ITEM	ACTION	INITIALS
5.	Obtain portable high-band radio in silver case.	
	a. Open case and pull out the magnetic based antenna.	
	b. Place antenna on roof of vehicle.	
	 Plug the power connector into vehicle power outlet (typically by cigarette lighter) 	
	d. Turn on radio, power button located on upper left corner of radio.	
	e. Set channel to EP1, located on right side of radio, up and down arrows.	
	f. Set volume using up/down arrows located on left of radio, above "MON" button.	
	g. Establish radio communications with EMT Communicators, if EOF is activated.	





EMT ACTIVATION CHECKLIST

ITEM	ACTION	INITIALS
6.	Obtain personnel dosimetry for each team member:	
	a. High range SRPD (zeroed)b. Low range SRPD (zeroed)c. TLD	
7.	Don a reflective vest (each team member).	
8.	Verify all required equipment is loaded into vehicle to be used by the EMT.	
9.	Activate the vehicle's amber light.	
10.	Obtain current annual TEDE for each team member from the RPO/RAF and record on Form EPIPF-ENV-01-02, EMT Status.	
11.	Obtain meteorological and release data from the EMTCd or the RPO/RAF using Form EPIPF-ENV-01-03, Meteorological and Plant Status Data.	
12.	Synchronize the EMT timepiece(s) with the time from the PPCS computer. To obtain PPCS computer time, contact the EMTCd or Radiological Protection Director (RPD).	
	NOTE: When Steps 1 through 12 above are completed, EMT activation is complete.	

DATE/TIME/ACTIVATION COMPLETED:	
	·

ITEM	ACTION	INITIALS
13.	Initiate Standing Order SO-1, SO-2, or SO-3 according to EPIP-ENV-04D, Plume Tracking for Environmental Monitoring Teams, or other orders as directed.	
14.	Establish communications with the Environmental Monitoring Team Coordinator (EMTCd).	
15.	Report the following information to the EMTCd Using Form EPIPF-ENV-01-02, EMT Status:	
	 a. Team designator (A, B, or C) b. Team membership (names) c. Current annual TEDE (mRem) d. Date/time activated 	

Date: JUL 31 2003

Maintain completed checklist in EMT Log.

EOF ACTIVATION CHECKLIST

	ITEM	ACTION	INITIAL WHEN COMPLETED
	1	Position furniture and communications equipment in accordance with the floor plans attached to the containers listed below:	
		NOTE: (1) Equipment boxes listed in order of priority.	
		(2) A dial tone should be heard each time a telephone is connected to the appropriate wall jack.	
		(3) Title markers (name tents) should be placed in front of the chair where the individual with that title sits.	
		a. Box - A (SRCL/EPD Area)	
Ĭ		b. Box - B (ALD Area)	
Ì		c. Box - C (ENV Work Area)	
		d. Box - D (NRC Conference Room)	
		e. Box - E (State/County Conference Room)	
		f. Set out clipboards, name tags, baskets, and "Telephone Communication Log" pads.	
ı		g. Enter ERO personnel on Duty Roster board.	
		h. <u>IF</u> full NRC response is anticipated, <u>THEN</u> clear <u>AND</u> set up Conference Room G1-4 (See: Figure EPIPFG-APPX-A-06-06).	
1	2	Establish security for the EOF/JPIC work area using Figure EPIPFG-EOF-12-01 attached to this checklist:	
		a. Station a person at Station 5 with the appropriate instructions and materials from procedure EPIP-EOF-12.	
		b. At all Figure locations marked "P" (Post), hang the "This Area Is Secured" signs.	
		<u>NOTE</u> : <u>IF</u> unauthorized personnel become a problem, <u>THEN</u> the doors marked "L" (Lockable) can be locked. Keys to those doors are hung inside the EOF storage closet door to be issued to EOF personnel as needed.	
		c. Ensure that all EOF/JPIC staff in the facility at the time are logged in on Form EPIPF-EOF-12-01 and issued an EOF/JPIC badge.	
	3	Communication System Checks:	
		a. <u>EOF Telecopier</u> : Send a test page of text to the printer (located in hallway outside EOF) at -5544 to verify the fax transmission capability.	
		b. Dial-Select: (Sta. 10) contact the TSC (ext. 33).	
		c. Env. Monitoring Group Communications Systems: Contact at least one EMT using radio or telephone.	

Date: JUL 31 2003

EOF ACTIVATION CHECKLIST

ITEM	ACTION	INITIAL WHEN COMPLETED
	 d. PPCS Data Validity: Contact the TSC or Control Room to identity any data points on the PPCS that are invalid (out of service) and should not be used. 	
	 Post the PPCS terminal with the identification of any invalid data points. 	
	e. PPCS Computer: Call up graphic display screen #53.	
	f. Verify wall clocks in EOF have the same time as the PPCS Computer.	
	g. Turn on the Recorder's PC located next to fax machine in D2-3. Login ID is EOF1 (upper case), password is 16F15OE5 (upper case). Click on advanced and make sure "Tree" reads "WPSR_R," context reads "Non-WPSC," and server reads "GBNUC1." Click on advanced again.	
	<u>NOTE</u> : You may get a pop-up window asking for another password to link to Windows 2000. Use the same password, but in lower case.	
	Start up Word for recording events. Template for drill and exercise Master Log is located on the "C" drive, under "Documents and Settings." The printer for this PC is located in hallway near department supply closet.	
1 4	ERM Activation Actions	
	a. Verify capability for EOF to assume the following responsibilities:	
	(1) Off-site notification	
	(2) Dose Assessment	
	(3) PAR Determination	(ERM)
	b. Announce EOF activation and scope of responsibilities assumed.	(ERM)
	c. Notify the ED AND inform him of the scope of EOF activation.	(ERM)
ERM SI	GNATURE	
DATE		
TIME		

Form EPIPF-EOF-02-01 Rev. U

Date: JUL 31 2003

SEVERE ACCIDENT MANAGEMENT - STATUS

DATE:	TIME:	

SCST/DFC LIMITS	CURRENT VALUE	WIT LIM TRI	LUE THIN ITS? END ROW	IS GUIDE IN USE?	IF YES - STRATEGY IN EFFECT	IF NO - REASONS WHY NOT
Radiation Releases < Gen. Emrg. Level		Yes	No	SCG-1		
per SCST Table 1				Yes No		
Containment Pressure < 112 psig	noig	Yes	No	SCG-2		
	psig			Yes No		
Hydrogen per SCST		Yes	No	SCG-3		
< Figure 1				Yes No		
Containment Pressure	psig	Yes	No	SCG-4		
> -2.8 psig	Po18			Yes No		

SEVERE ACCIDENT MANAGEMENT - STATUS

DATE:		TIME:	
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SCST/DFC LIMITS	CURRENT VALUE	VALUE WITHIN LIMITS? TREND ARROW	IS GUIDE IN USE?	IF YES - STRATEGY IN EFFECT	IF NO - REASONS WHY NOT
SG Levels > 44% NR	<u>A</u> <u>B</u> % NR%% WR%	Yes No	SAG-1 Yes No		
RCS Pressure < 400 psig	psig	Yes No	SAG-2 Yes No		
Core Temperature < 700°F	Tc <u>A LOOP B</u> (deg. F) HL CL	Yes No	SAG-3 Yes No		
Containment Level > 6 FT	FT.	Yes No	SAG-4 Yes No		
Radiation Releases < Site Emrg. Level per DFC Table 1		Yes No	SAG-5 Yes No		
Containment Pressure < 4 psig	psig	Yes No	SAG-6 Yes No		
Containment Hydrogen < 5%	%	Yes No	SAG-7 Yes No		

Date: JUL 31 2003