



NRC-03-103

10 CFR 50, App. E

October 3, 2003

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

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

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

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

Thomas Coutu  
Site Vice President, Kewaunee Nuclear Power Plant  
Nuclear Management Company, LLC

SLC

Enclosure

cc: Senior Resident Inspector, Kewaunee, w/enc.  
Administrator Region III (2 copies), w/enc.  
Public Service Commission of Wisconsin, w/o enc.  
QA Vault, w/o enc.

A045

# DOCUMENT TRANSMITTAL

KEWAUNEE NUCLEAR POWER PLANT

FROM: DIANE FENCL - KNPP

TRANSMITTAL DATE 09-30-2003

## EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

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Krista Kappelman - PBNP - EP (10)\*  
Kevin Joachim - Alliant Energy (11)\*  
Jill Stern - Nuclear Management Company (12)\*  
Chuck Zoia - NRC Region III (13)\*

PERSONAL COPIES (21-40) These copies are for the personal use of the listed individuals for reference or emergency response.

J. Bennett (33)

J. Morlino (24)

J. Ferris (13)

T. Coutu (28)

REFERENCE COPIES - CUSTODIAN (41-100) These copies are for general reference by anyone. They are distributed throughout the plant and corporate offices. The named individual is the responsible custodian for the procedures and shall insure they are properly maintained.

NO Library - KNPP (59)  
C. Sternitzky - ATF-2 (44)  
M. Daron - Security Building (46)  
C. Grant - EOF (81)  
C. Grant - OSF (52, 96)  
LOREB - STF (62, 66, 67, 68, 70, 72, 73, 74)  
STF Library (43)

Resource Center - Training (82)  
D. Krall - CR/SS Office (51, 56)  
C. Grant - TSC (50, 95)  
W. Galarneau - RAF (53)  
W. Galarneau - SBF/EMT (54)  
W. Galarneau - RPO (55)  
STF (86, 87, 88)

WORKING COPIES (101-199) These copies of procedures are kept in the areas designated for use in response to an emergency.

W. Galarneau - RAF/RPO (106, 107)(Partial Distribution)  
W. Galarneau - SBF/ENV (108, 109)(Partial Distribution)  
W. Galarneau - SBF/EM Team (110, 111, 111A)(Partial Distribution)  
W. Flint - Cold Chem/HR Sample Room (113)  
S. Zutz - SBF/SEC (114)  
E. Gilson - Security (121)  
S. Zutz - Security Building (120)  
Ops Admin. (126)  
C. Grant (Liaison Manuals)(EPIP-EOF-04 and APPX-A-06 Figures only)

C. Grant - TSC Response Blue Binder (Partial Distribution)  
C. Grant - TSC Response Red Binder (Partial Distribution)  
~~C. Grant - TSC (Partial Distribution - FORMS ONLY)~~  
C. Grant - EOF Response Binder (Partial Distribution)  
D. Krall - CR Response Binder (Partial Distribution)  
K. Stangel - SCR Response Binder (Partial Distribution)  
D. Krall - CR Tag Desk (Partial Distribution)  
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Originals to KNPP QA Vault

Please follow the directions when updating your EPIP Manual. **WATCH FOR DELETIONS!!!** These are controlled procedures and random checks may be made to ensure the manuals are kept up-to-date.

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

**KEWAUNEE NUCLEAR POWER PLANT  
REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES  
September 30, 2003**

**Please follow the directions listed below.**

**EPIP Index, dated 09-30-2003.**

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-20	D	EPIP-AD-20	E

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 EIPs has  
been updated.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

Please return this sheet to **DIANE FENCL.**

# EMERGENCY PLAN IMPLEMENTING PROCEDURES

## INDEX

DATE: 09-30-2003

PROC. NO.	TITLE	REV.	DATE
<b>EP-AD</b>			
EPIP-AD-01	Personnel Response to the Plant Emergency Siren	L	09-09-2003
EPIP-AD-02	Emergency Class Determination	AG	05-05-2003
EPIP-AD-03	KNPP Response to an Unusual Event	AJ	09-09-2003
EPIP-AD-04	KNPP Response to Alert or Higher	AO	09-09-2003
EP-AD-5	Site Emergency	Deleted	04-27-87
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	E	02-18-2003
EP-AD-6	General Emergency	Deleted	04-24-87
EPIP-AD-07	Initial Emergency Notifications	AV	09-09-2003
EP-AD-8	Notification of Alert or Higher	Deleted	02-26-96
EP-AD-9	Notification of Site Emergency	Deleted	04-27-87
EP-AD-10	Notification of General Emergency	Deleted	04-27-87
EPIP-AD-11	Emergency Radiation Controls	S	12-19-2002
EP-AD-12	Personnel Assembly and Accountability	Deleted	03-26-94
EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
EP-AD-13B	Emergency Assembly/Evacuation	Deleted	03-01-83
EP-AD-13C	Site Evacuation	Deleted	03-01-83
EP-AD-14	Search and Rescue	Deleted	05-25-94
EPIP-AD-15	Recovery Planning and Termination	P	09-12-2002
EP-AD-16	Occupational Injuries or Vehicle Accidents During Emergencies	Deleted	03-14-97
EP-AD-17	Communications	Deleted	03-05-84
EPIP-AD-18	Potassium Iodide Distribution	P	02-27-2002
EPIP-AD-19	Determining Protective Action Recommendations	T	09-19-2003

**EMERGENCY PLAN IMPLEMENTING PROCEDURES**

**INDEX**

**DATE: 09-30-2003**

<b>PROC. NO.</b>	<b>TITLE</b>	<b>REV.</b>	<b>DATE</b>
EPIP-AD-20	KNPP Response to a Security Threat	E	09-30-2003
<b>EP-ENV</b>			
EPIP-ENV-01	Environmental Monitoring Group Organization and Responsibilities	X	07-31-2003
EPIP-ENV-02	Environmental Monitoring Team Activation	Y	07-31-2003
EP-ENV-3A	Environmental Protection Director Actions and Directives	Deleted	09-26-84
EP-ENV-3B	EM Team Actions	Deleted	09-26-84
EPIP-ENV-03C	Dose Projection Using RASCAL Software	X	09-19-2003
EP-ENV-3D	Revision and Control of ISODOSE II	Deleted	02-14-95
EP-ENV-3E	Manual Determination of X/Q	Deleted	04-24-87
EP-ENV-3F	Manual Determination of X/Q (Green Bay Meteorological Data)	Deleted	05-30-86
EP-ENV-3G	Manual Dose Projection Calculation	Deleted	06-02-89
EP-ENV-3H	Protective Action Recommendations	Deleted	04-13-90
EPIP-ENV-04A	Portable Survey Instrument Use	U	07-31-2003
EPIP-ENV-04B	Air Sampling and Analysis	Y	07-31-2003
EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
EPIP-ENV-04C	Ground Deposition Sampling and Analysis	Y	07-31-2003
EPIP-ENV-04D	Plume Tracking for Environmental Monitoring Teams	P	07-31-2003
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
EP-ENV-5C	SAM II Operation	Deleted	04-14-86
EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
EP-ENV-5E	Reuter-Stokes Operation	Deleted	08-27-85

# EMERGENCY PLAN IMPLEMENTING PROCEDURES

## INDEX

DATE: 09-30-2003

PROC. NO.	TITLE	REV.	DATE
EP-ENV-6	Data Analysis, Dose Projections and Protective Action Recommendations	Deleted	12-21-81
EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
EP-ENV-7	Site Access Facility Communications	Deleted	09-26-84
EP-ENV-8	Total Population Dose Estimate Calculations	Deleted	04-14-86
<b>EP-EOF</b>			
EP-EOF-1	Corporate Emergency Response Organization	Deleted	03-11-94
EPIP-EOF-02	Emergency Operations Facility (EOF) Activation	AB	07-31-2003
EPIP-EOF-03	EOF Staff Action for Unusual Event	AE	07-31-2003
EPIP-EOF-04	EOF Staff Action for Alert or Higher	AL	07-31-2003
EP-EOF-5	Corporate Staff Action for Site Emergency	Deleted	04-24-87
EP-EOF-6	Corporate Staff Action for General Emergency	Deleted	04-24-87
EP-EOF-7	Notification of Unusual Event	Deleted	04-06-94
EP-EOF-8	Relocation of EOF	Deleted	03-01-83
EPIP-EOF-08	Continuing Emergency Notifications	AA	07-31-2003
EP-EOF-9	Interface with Support Organizations	Deleted	03-05-84
EP-EOF-9	Notification of Site Emergency	Deleted	04-24-87
EP-EOF-10	Notification of General Emergency	Deleted	04-24-87
EPIP-EOF-11	Internal Communication and Documentation Flow	W	07-31-2003
EPIP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center/Security	R	06-19-2003

# EMERGENCY PLAN IMPLEMENTING PROCEDURES

## INDEX

DATE: 09-30-2003

PROC. NO.	TITLE	REV.	DATE
<b>EP-OP</b>			
EP-OP-1	Control Room Emergency Organization	Deleted	04-24-87
EP-OP-2	Emergency Control Room Activation for Emergency Response	Deleted	04-24-87
EP-OP-3	Control Room Communications	Deleted	04-24-87
<b>EP-OSF</b>			
EP-OSF-1	Operation Support Facility Emergency Organization	Deleted	04-24-87
EPIP-OSF-02	Operational Support Facility Operations	V	11-26-2002
EPIP-OSF-03	Work Orders During an Emergency	P	05-09-2002
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
EPIP-OSF-04	Search and Rescue	E	05-23-2002
<b>EP-RET</b>			
EP-RET-1	Radiation Emergency Team Organization	Deleted	04-16-96
EPIP-RET-02	In-Plant Radiation Emergency Team	X	07-31-2003
EPIP-RET-02A	Radiation Protection Office/Radiological Analysis Facility (RPO/RAF) Activation	U	11-07-2002
EPIP-RET-02B	Gaseous Effluent Release Path, Radioactivity, and Release Rate Determination	T	09-19-2003
EP-RET-2C	Containment Air Sampling and Analysis	Deleted	03-01-83
EPIP-RET-02D	Emergency Radiation Entry Controls and Implementation	M	06-12-2001
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
EP-RET-2F	Personnel Decontamination	Deleted	04-13-90
EPIP-RET-03	Chemistry Emergency Team	P	02-18-2003
EPIP-RET-03A	Liquid Effluent Release Paths	L	11-29-2001
EP-RET-3B	Post-Accident Reactor Coolant Alternate Sampling Procedure	Deleted	01-25-88

**EMERGENCY PLAN IMPLEMENTING PROCEDURES**

**INDEX**

**DATE: 09-30-2003**

<b>PROC. NO.</b>	<b>TITLE</b>	<b>REV.</b>	<b>DATE</b>
EPIP-RET-03C	Post Accident Operation of the High Radiation Sample Room	P	01-15-2002
EPIP-RET-03D	Containment Air Sampling Analysis Using CASP	N	01-15-2002
EP-RET-3E	Post Accident Operation of High Rad Sample Room Inline Multiported Count Cave	Deleted	08-27-85
EPIP-RET-04	SBF Activation	U	06-19-2003
EP-RET-4A	EOF Radiological Monitoring	Deleted	03-10-83
EPIP-RET-04A	SBF Operation/Relocation	Deleted	10-02-2001
EP-RET-4B	Radiological Controls at Site Access Facility	Deleted	07-12-94
EP-RET-4C	Site Radiological Monitoring	Deleted	07-12-94
EP-RET-4D	SAM-II Operation	Deleted	07-12-94
EP-RET-5	Plume Projection	Deleted	09-26-84
EPIP-RET-05	Site Boundary Dose Rates During Controlled Plant Cooldown	I	07-31-2003
EP-RET-5A	Plume Projection	Deleted	04-27-87
EP-RET-6	Dose Projection	Deleted	04-24-87
EP-RET-7	Radiological Analysis Facility/Radiation Protection Office Communications	Deleted	04-24-87
EPIP-RET-08	Contamination Control of the Aurora Medical Center	Deleted	05-23-2002
EPIP-RET-09	Post-Accident Population Dose	Deleted	09-19-2003
<b>EP-SEC</b>			
EP-SEC-1	Security Organization	Deleted	04-24-87
EPIP-SEC-02	Security Force Response to Emergencies	Z	07-31-2003
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EPIP-SEC-03	Personnel Assembly and Accountability	AG	05-20-2003
EPIP-SEC-04	Security Force Actions for Dosimetry Issue	P	10-02-2001

# EMERGENCY PLAN IMPLEMENTING PROCEDURES

## INDEX

DATE: 09-30-2003

PROC. NO.	TITLE	REV.	DATE
EP-SEC-5	Security Force Response to the EOF	Deleted	07-28-88
EPIP-SEC-05	Personnel Evacuation	G	06-20-2002
<b>EP-TSC</b>			
EPIP-TSC-01	Technical Support Center Organization and Responsibilities	S	01-28-2003
EPIP-TSC-02	Technical Support Center Activation	U	01-20-2003
EPIP-TSC-03	Plant Status Procedure	W	05-05-2003
EPIP-TSC-04	Emergency Modifications	O	04-29-2003
EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
EPIP-TSC-07	RV Head Venting Time Calculation	J	06-20-2002
EPIP-TSC-08A	Calculations for Steam Release from Steam Generators	P	09-02-2003
EPIP-TSC-08B*	STMRLS Computer Program	H	07-31-2003
EP-TSC-8C*	See EP-TSC-8B	Deleted	04-16-92
* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			
EP-TSC-9	Core Damage Assessment Using Released Radionuclides	Deleted	09-30-86
EPIP-TSC-09A*	Core Damage Assessment	K	05-05-2003
EPIP-TSC-09B*	CORE Computer Program	Deleted	05-16-2002
EP-TSC-9C*	See EP-TSC-9B	Deleted	04-16-92
* EP-TSC-9A, Rev. D was totally deleted; therefore, EP-TSC-9B became EP-TSC-9A. EP-TSC-9B was previously EP-TSC-9C.			
EPIP-TSC-10	Technical Support for IPEOPs	L	07-31-2003

**EMERGENCY PLAN IMPLEMENTING PROCEDURES**

**INDEX**

**DATE: 09-30-2003**

<b>FIGURES</b>					
<b>EPIP</b>	<b>FIG #</b>	<b>Figure EPIPF</b>	<b>DESCRIPTION</b>	<b>REV.</b>	<b>DATE</b>
EPIP-SEC-05 EPIP-APPX-A-06	EP-FIG-003	APPX-A-06-03	Technical Support Center - KNP Floor Plan	B	06-12-2001
EPIP-APPX-A-06	EP-FIG-005	APPX-A-06-02	Site Boundary Facility - KNP Floor Plan	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-008	APPX-A-06-01	Radiological Analysis Facility - KNP Floor Plan	A	10-31-2000
EPIP-EOF-12 Form EPIPF-EOF-02-01	EP-FIG-009	EOF-12-01	Division Office Building (2nd Floor) Floor Plan	C	06-19-2003
EPIP-APPX-A-06	EP-FIG-012	APPX-A-06-08	State/County Work Area - WPSC D2-1 Floor Plan	C	10-31-2000
EPIP-APPX-A-06	EP-FIG-013	APPX-A-06-09	NRC Work Area - WPSC D2-4 Floor Plan	A	10-31-2000
EPIP-AD-19	EP-FIG-014	AD-19-01	Population Distribution by Geographical Sub-Areas (with sectors)	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-022	APPX-A-06-04	EOF - WPSC D2-3 Floor Plan	D	04-29-2003
EPIP-EOF-12	EP-FIG-024	EOF-12-02	Location of JPIC and Media Briefing Center Map	D	06-19-2003
EPIP-SEC-05	EP-FIG-026	SEC-05-01	KNP Site Map & Evacuation Routes	E	09-19-2003
APPX-A-6	EP-FIG-034	---	Floor Plan - Media Briefing Center	Deleted	08-04-98
EPIP-EOF-12 EPIP-APPX-A-06	EP-FIG-035	APPX-A-06-06	Media Briefing Center	D	04-29-2003
APPX-A-6	EP-FIG-037	---	Floor Plan - Corporate Response Center	Deleted	08-04-98
APPX-A-6	EP-FIG-038	---	Floor Plan - JPIC	Deleted	08-04-98
EPIP-OSF-02	EP-FIG-039	OSF-02-01	High Priority Work	B	07-31-2003
EPIP-OSF-02	EP-FIG-039A	OSF-02-02	Lower Priority Work	B	07-31-2003
EPIP-APPX-A-06	EP-FIG-043	APPX-A-06-10	JPIC - Federal Work Area - WPSC D2-9	C	04-29-2003
EPIP-APPX-A-06	EP-FIG-044	APPX-A-06-07	JPIC - State and County Work Area - WPSC D2-8	D	04-29-2003
EPIP-APPX-A-06	EP-FIG-045	APPX-A-06-05	JPIC - Utility Work Area - WPSC D2-7	D	04-29-2003
RET-08	EP-FIG-046	RET-08-01	Aurora Medical Center Location	Deleted	05-23-2002
EPIP-APPX-A-02	---	APPX-A-02-01	ERO Call Tree	Deleted	12-04-2001

**EMERGENCY PLAN IMPLEMENTING PROCEDURES**

**INDEX**

**DATE: 09-30-2003**

<b>NUMBER</b>	<b>TITLE</b>	<b>REVISION</b>	<b>DATE</b>
	<b>APPENDIX A</b>		
APPX-A-1	Communication System Description	AF	08-04-98
EPIP-APPX-A-02	Response Personnel Call List	Deleted	02-06-2002
EPIP-APPX-A-03	Off-Site Telephone Numbers	Deleted	02-06-2002
EPIP-APPX-A-06	KNPP Emergency Response Facility Figures	AB	04-29-2003

# EMERGENCY PLAN IMPLEMENTING PROCEDURES

## INDEX

DATE: 09-30-2003

FORM EPIPF	TITLE	REV.	DATE
<b>APPENDIX B</b>			
<b>EP-AD</b>			
AD-07-01	Event Notice - Nuclear Accident Reporting System Form (NARS)	V	05-05-2003
AD-07-02	State Call-Back - Question Guideline	C	11-15-2001
AD-07-03	Fax Event Notice	C	09-19-2003
AD-07-04	ERO Event Notification	Deleted	07-31-2003
AD-11-01	Emergency Radiation Work Permit	H	12-19-2002
AD-18-01	Airborne Radioiodine Dose Accountability and Potassium Iodide Distribution	B	08-06-2002
AD-18-02	Record of Known Allergy To or Voluntary Refusal to Take Potassium Iodide	A	02-27-2002
<b>EP-ENV</b>			
ENV-01-01	Environmental Dispatch Area Activation Checklist	E	07-31-2003
ENV-01-02	EMT Status	C	07-31-2003
ENV-01-03	Meteorological and Plant Status Data	C	12-14-2001
ENV-01-04	EMT Orders/Field Data	C	07-31-2003
ENV-02-01	EMT Activation Checklist	O	07-31-2003
<b>EP-EOF</b>			
EOF-02-01	EOF Activation Checklist	V	09-19-2003
EOF-02-02	EOF Deactivation Checklist	N	01-28-2003
EOF-04-01	SRCL Initial Action Checklist	D	01-20-2003
EOF-04-02	Telephone Communications Log Sheet	A	12-14-2001
EOF-08-03	Fax for Emergency Declaration or Status Updates	H	01-20-2003
EOF-08-05	Plant Emergency Status Report	A	11-27-2001
EOF-08-06	Radiological Status Report	E	01-20-2003
EOF-11-02	Operating Status	G	11-07-2002

**EMERGENCY PLAN IMPLEMENTING PROCEDURES**

**INDEX**

**DATE: 09-30-2003**

<b>FORM EPIPF</b>	<b>TITLE</b>	<b>REV.</b>	<b>DATE</b>
EOF-11-03	Environmental Status Board	G	11-07-2002
EOF-12-01	I.D. Badge Registration Form	G	10-24-2000
<b>EP-OSF</b>			
OSF 2.2	Maintenance Work in Progress	Deleted	07-08-98
OSF-03-01	Operational Support Facility Team Briefing	C	12-04-2001
<b>EP-RET</b>			
RET-02A-02	Emergency Sample Worksheet	E	06-05-2001
RET-02B-01	Containment Stack Release (Grab Sample)	E	09-19-2003
RET-02B-02	Auxiliary Building Stack Release (Grab Sample)	E	09-19-2003
RET-02B-03	Auxiliary Building Stack Release (Sping Reading)	E	09-19-2003
RET-02B-04	Containment Stack Release (Sping Reading)	D	09-19-2003
RET-02B-05	Steam Release	E	09-19-2003
RET-02B-06	Field Reading (Grab Sample)	B	08-06-2002
RET-04-01	SAM-2 Counting Equipment Worksheet	E	06-12-2001
RET 8.3	Hospital Survey 1	Deleted	06-05-2001
RET 8.4	Hospital Survey 2	Deleted	07-25-97
RET 8.5	Hospital Survey 3	Deleted	07-25-97
RET-08-06	Hospital Survey 4	Deleted	05-23-2002
RET-09-01	Post-Accident TLD Record Sheet	D	04-16-2002
<b>EP-SEC</b>			
SEC-03.01	Emergency Accountability Log	A	03-28-2000
SEC-04-01	Emergency Dosimeter Log	G	06-20-2002
<b>EP-TSC</b>			
TSC-01.01	Plant Status Summary for SAM Implementation	C	01-28-2003
TSC-01.02	Severe Accident Management Summary and Strategy Recommendation	B	02-06-2002

**EMERGENCY PLAN IMPLEMENTING PROCEDURES**

**INDEX**

**DATE: 09-30-2003**

<b>FORM EIPF</b>	<b>TITLE</b>	<b>REV.</b>	<b>DATE</b>
TSC-01-03	Severe Accident Management - Status	C	07-31-2003
TSC-02-01	TSC and OSF Activation Checklist	P	01-20-2003
TSC-02-02	TSC Ventilation Checklist	J	09-19-2003
TSC-02-03	Emergency Response Data System (ERDS) Link Initiation Checklist	H	01-20-2003
TSC-02-04	TSC Chart Recorder Operation Checklist	E	01-20-2003
TSC-02-05	TSC and OSF De-Activation Checklist	C	01-28-2003
TSC-03-01	Plant System Status	L	06-12-2001
TSC-03-02	Plant Equipment Status	L	06-12-2001
TSC-03-03	Environmental Status Board	J	06-12-2001
TSC-03-04	Radiation Monitors	I	01-08-2002
TSC-04-01	Emergency Modification Request	H	04-29-2003
TSC-04-02	Emergency Physical Change Safety Review	Deleted	05-09-2002
TSC-04-03	Emergency Modification Index	G	04-29-2003
TSC-07-01	Head Venting Calculation	G	06-20-2002
TSC-08A-01	Steam Release Data Sheet (Energy Balance)	H	12-14-2001
TSC-08A-02	Steam Release Calculation Sheet (Energy Balance)	H	09-02-2003
TSC-08A-03	Steam Release Data/Calculation Sheet (Open Valve)	E	12-14-2001
TSC-08A-04	Steam Release Data/Calculation Sheet (STMRLS Program)	D	12-14-2001
TSC-09A-01	Core Exit Thermocouple Data	D	05-16-2002
TSC-09A-02	Fuel Rod Clad Damage Estimate	D	05-16-2002
TSC-09A-03	Fuel Rod Overtemperature Damage Estimate	E	05-16-2002
TSC 9A.4	Core Damage Based on Activity Ratios	Deleted	05-16-2002
TSC-09A-05	Core Damage Assessment (Monitoring Data)	E	05-16-2002
TSC 9A.6	Core Damage Summary	Deleted	05-16-2002
TSC-09A-07	Core Damage Assessment Results	A	05-05-2003

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>		No.	EPIP-AD-20	Rev.	E
		Title	KNPP Response to a Security Threat		
<i>Emergency Plan Implementing Procedure</i>		Date	SEP 30 2003	Page 1 of 10	
		Reviewed By	Richard Johnson		Approved By Jerrie Morlino
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 1.0 Purpose

- 1.1 This procedure provides instruction for the Shift Manager (SM)/Emergency Director (ED) and other initial response personnel for an appropriate response to a credible security threat specific to the Kewaunee Nuclear Power Plant (KNPP).

## 2.0 General Notes

- 2.1 The Hudson Security Command Post will be in operation at 715-377-3353 and will be the hub for security communication.
- 2.2 Security will provide a management individual to an appropriate location for coordination of information.

## 3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07-01, shall 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 SM should remain in the Control Room during a declared emergency.
- 3.3 The following responsibilities of the ED shall not be delegated.
- 3.3.1 Determination of emergency classification (EPIP-AD-02).
- 3.3.2 Authorization of emergency exposures in excess of 10CFR Part 20 limits (EPIP-AD-11).
- 3.3.3 UNTIL the Emergency Response Manager (ERM) assumes the responsibility following EOF activation, recommendations of protective actions to off-site authorities (EPIP-AD-19).

## 4.0 Initial Conditions

- 4.1 This procedure shall be implemented upon declaration of a credible security threat LO or HI as determined by security procedures.
- 4.2 If there is a HI security threat, go to Step 5.1.

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b>	EPIP-AD-20	<b>Rev.</b>	E
	<b>Title</b>	KNPP Response to a Security Threat		
	<b>Date</b>	SEP 30 2003	<b>Page 2 of 10</b>	

4.3 If there is a LO security threat, go to Step 5.2.

## 5.0 Procedure

### Note

*If an Alert classification has been declared based on a HI credible security threat, site personnel are to be placed out of harms way as soon as possible. EOF and Joint Public Information Center (JPIC) are to be staffed and activated to ensure on-site and off-site communications are established.*

5.1 **IF** there is a HI security threat declare an ALERT as defined in EPIP-AD-02, "Emergency Class Determination Chart Q," **THEN** the SM/ED shall take the following actions:

5.1.1 Initiate an immediate personnel evacuation.

Read aloud two (2) times on the Gai-tronics the message below:

"Attention all personnel. Attention all personnel. We are experiencing an ALERT based on a credible security threat. Place all essential activities in a safe condition. All EOF personnel assemble at the EOF in Green Bay. All JPIC personnel report to the JPIC in Green Bay. The on-shift operations crew, Radiation Technologist, Chemistry Technologist, and Emergency Director report to the Control Room. All other personnel shall evacuate the site."

5.1.2 Contact the Security Shift Captain/Site Protection Director and verify "Security Force Response to Emergencies," EPIP-SEC-02, actions are being implemented for an Alert or Higher.

- Verify on-site members of the general public are directed to leave the site in accordance with EPIP-SEC-02.
- Verify control measures for site access/egress are established in accordance with EPIP-SEC-02.

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

### Note

*Unstable meteorology exists if:*

1. *The 10 and 60 meter wind speed is less than 5 mph, **AND***
  2. *Delta T is greater than +2.4°F or Sigma Theta is less than 3.01°.*
- **WHEN** completing Box #8, get the downwind sector by using Table 1 on Page 2 of the form. **IF** unstable meteorology exists, **THEN** enter N/A in Box #8 and explain in Box #11.

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b> EPIP-AD-20	<b>Rev.</b> E
	<b>Title</b> KNPP Response to a Security Threat	
	<b>Date</b> SEP 30 2003	<b>Page 3 of 10</b>

- WHEN completing Box #10, check the following item:

(A) None

- 5.1.4 Direct the Notifier (NAO) to initiate notifications per "Initial Emergency Notifications," EPIP-AD-07, using the "Event Notice," Form EPIP-AD-07-01, completed in Step 5.1.3.
- 5.1.5 Direct the Notifier (NAO) to activate pagers for Emergency Response Personnel in accordance with EPIP-AD-07, using the following envelope:
- CREDIBLE SECURITY THREAT - ALERT [Envelope E]
- 5.1.6 Direct the STA to implement "KNPP Response to Alert or Higher," EPIP-AD-04 Step 5.6, and notify the NRC.
- 5.1.7 Verify that Manitowoc and Kewaunee County Sheriff have been notified and informed that the EOF is being activated to coordinate communications.
- 5.1.8 Review "State Call-Back - Question Guideline," Form EPIP-AD-07-02, to prepare for questions which are most likely to be asked by State Duty Officer or State Radiological Coordinator.
- 5.1.9 Log all significant events and actions.
- 5.1.10 Update facility EOF and JPIC directors as needed.
- 5.1.11 Ensure the overall emergency level is continually reviewed.
- \_\_\_\_\_ Event Classification (EPIP-AD-02)
- \_\_\_\_\_ PAR (EPIP-AD-19)
- \_\_\_\_\_ Emergency Radiological Exposures (EPIP-AD-11)
- 5.1.12 IF the threat results in plant damage or a higher classification is appropriate and the security threat has not been mitigated, THEN continue to assess conditions and augment ERO when conditions change.

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b>	<b>EPIP-AD-20</b>	<b>Rev.</b>	<b>E</b>
	<b>Title</b>	<b>KNPP Response to a Security Threat</b>		
	<b>Date</b>	<b>SEP 30 2003</b>	<b>Page 4 of 10</b>	

5.1.13 Determine the response status with an information collection brief. Include all of the following that are applicable:

- Off-site Notifications (EPIP-AD-07)
- Plant Operations Status
- Control Room support priorities
- Status of Radiological Effluent Releases (potential off-site dose consequences)
- Off-site Dose Assessment Evaluation
- Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure)
- Status of Personal Injuries or Vehicle Accidents
- Availability of Potassium Iodide (EPIP-AD-18)
- Removal of Visitors from site (i.e., fishermen) (EPIP-SEC-02)
- Access Control
- Significant Security Activities

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

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

5.1.15 Verify the ERM has implemented "EOF Staff Action for Alert or Higher," EPIP-EOF-04.

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b>	<b>EPIP-AD-20</b>	<b>Rev.</b>	<b>E</b>
	<b>Title</b>	<b>KNPP Response to a Security Threat</b>		
	<b>Date</b>	<b>SEP 30 2003</b>	<b>Page 5 of 10</b>	

5.1.16 Update the ERM on:

- 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., Security Events, fires, spills, personnel contamination, and personnel injuries)

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

5.1.18 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.1.9.

5.1.19 WHEN Final Conditions (Section 6.0) are met, THEN go to EPIP-AD-04, Final Conditions Section.

**Note**

*If an Unusual Event classification has been declared based on an LO credible security threat, site personnel are to be placed out of harms way as soon as possible. EOF and JPIC are to be staffed and activated to ensure on-site and off-site communications are established.*

5.2 IF there is an LO security threat declare an UNUSUAL EVENT as defined in EPIP-AD-02, "Emergency Class Determination Chart Q," THEN the SM/ED shall take the following actions:

5.2.1 Initiate an immediate personnel evacuation.

Read aloud two (2) times on the Gai-tronics the message below:

"Attention all personnel. Attention all personnel. We are experiencing an UNUSUAL EVENT based on a credible security threat. Place all essential activities in a safe condition. All EOF personnel assemble at the EOF in Green Bay. All JPIC personnel report to the JPIC in Green Bay. The on-shift operations crew, Radiation Technologist, Chemistry Technologist, and Emergency Director report to the Control Room. All other personnel shall evacuate the site."

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b>	EPIP-AD-20	<b>Rev.</b>	E
	<b>Title</b>	KNPP Response to a Security Threat		
	<b>Date</b>	SEP 30 2003	<b>Page 6 of 10</b>	

5.2.2 Contact the Security Shift Captain/Site Protection Director and verify "Security Force Response to Emergencies," EPIP-SEC-02, actions are being implemented for an Alert or Higher.

- Verify on-site members of the general public are directed to leave the site in accordance with EPIP-SEC-02.
- Verify control measures for site access/egress are established in accordance with EPIP-SEC-02.

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

**Note**

*Unstable meteorology exists if:*

1. The 10 and 60 meter wind speed is less than 5 mph, **AND**
2. Delta T is greater than +2.4°F or Sigma Theta is less than 3.01°.

- **WHEN** completing Box #8, get the downwind sector by using Table 1 on Page 2 of the form. **IF** unstable meteorology exists, **THEN** enter N/A in Box #8 and explain in Box #11.
- **WHEN** completing Box #10, check the following item:  
(A) None

5.2.4 Direct the Notifier (NAO) to initiate notifications per EPIP-AD-07 using the "Event Notice," Form EPIPF-AD-07-01, completed in Step 5.1.3.

5.2.5 Direct the Notifier (NAO) to activate pagers for Emergency Response Personnel in accordance with EPIP-AD-07, using the following envelope:

**CREDIBLE SECURITY THREAT – UNUSUAL EVENT [Envelope D]**

5.2.6 Direct the STA to implement "KNPP Response to an Unusual Event," EPIP-AD-03 Step 5.5, and notify the NRC.

5.2.7 Verify that Manitowoc and Kewaunee County Sheriff have been notified and informed that the EOF is being activated to coordinate communications.

5.2.8 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.

5.2.9 Log all significant events and actions.

5.2.10 Update facility EOF and JPIC directors as needed.

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b>	<b>EPIP-AD-20</b>	<b>Rev.</b>	<b>E</b>
	<b>Title</b>	<b>KNPP Response to a Security Threat</b>		
	<b>Date</b>	<b>SEP 30 2003</b>	<b>Page 7 of 10</b>	

5.2.11 Ensure the overall emergency level is continually reviewed.

\_\_\_\_\_ Event Classification (EPIP-AD-02)

\_\_\_\_\_ PAR (EPIP-AD-19)

\_\_\_\_\_ Emergency Radiological Exposures (EPIP-AD-11)

5.2.12 **IF** the threat results in plant damage or a higher classification is appropriate and the security threat has not been mitigated, **THEN** continue to assess conditions and augment ERO as conditions change.

5.2.13 **IF** the threat is upgraded to HI or results in plant damage or a higher classification is appropriate, **AND** the security threat has **NOT** been mitigated, go to Step 5.1.

5.2.14 Determine the response status with an information collection brief. Include all of the following that are applicable:

- Off-site Notifications (EPIP-AD-07)
- Plant Operations Status
- Control Room support priorities
- Status of Radiological Effluent Releases (potential off-site dose consequences)
- Off-site Dose Assessment Evaluation
- Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure)
- Status of Personal Injuries or Vehicle Accidents
- Availability of Potassium Iodide (EPIP-AD-18)
- Removal of Visitors from site (i.e., fishermen) (EPIP-SEC-02)
- Access Control
- Significant Security Activities

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	No.      EPIP-AD-20	Rev.    E
	Title      KNPP Response to a Security Threat	
	Date      SEP 30 2003	Page 8 of 10

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

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

5.2.16 Verify the ERM has:

- Assessed personnel needed in the EOF and JPIC, **THEN** released unnecessary personnel
- Implemented "EOF Staff Action for Unusual Event," EPIP-EOF-03
- Coordinated with Nuclear Management Company (NMC) headquarters management personnel
- Determined what essential activities should proceed
- Made arrangements for appropriate personnel to continue activities determined essential

5.2.17 Update the ERM on:

- 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., Security Events, fires, spills, personnel contamination, and personnel injuries)

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

5.2.19 **IF** Final Conditions (Section 6.0) have **NOT** been met, **THEN** go to Step 5.2.9.

5.2.20 **WHEN** Final Conditions (Section 6.0) are met, **THEN** go to EPIP-AD-03, Final Conditions Section.

## 6.0 Final Conditions

6.1 The Security Threat has been mitigated and it is safe for personnel to return to the plant.

REFERENCE USE

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b>	<b>EPIP-AD-20</b>	<b>Rev.</b>	<b>E</b>
	<b>Title</b>	<b>KNPP Response to a Security Threat</b>		
	<b>Date</b>	<b>SEP 30 2003</b>	<b>Page 9 of 10</b>	

## 7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 KPB Emergency Telephone Directory
- 7.3 10CFR50.72(c)(3), Maintaining open communications with the NRC
- 7.4 E-0-08, Security Events
- 7.5 EPIP-AD-02, Emergency Class Determination
- 7.6 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.7 EPIP-AD-04, KNPP Response to Alert or Higher
- 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-18, Potassium Iodide Distribution
- 7.12 EPIP-AD-19, Protective Action Guidelines
- 7.13 EPIP-EOF-03, EOF Staff Action for Unusual Event
- 7.14 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.15 EPIP-EOF-08, Continuing Emergency Notifications
- 7.16 EPIP-SEC-02, Security Force Response to Emergencies
- 7.17 EPIP-SEC-05, Personnel Evacuation
- 7.18 NMC SE-0017, Security Threat Notification
- 7.19 NMC SE-0018, Security Threat Assessment
- 7.20 Form EPIPF-AD-07-01, Event Notice
- 7.21 Form EPIPF-AD-07-02, State Call-Back - Question Guideline
- 7.22 Figure 2 of GNP-11.04.04, Event Notification Worksheet

**REFERENCE USE**

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>	<b>No.</b>	<b>EPIP-AD-20</b>	<b>Rev.</b>	<b>E</b>
	<b>Title</b>	<b>KNPP Response to a Security Threat</b>		
	<b>Date</b>	<b>SEP 30 2003</b>	<b>Page 10 of 10</b>	

## 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-OA Records

None