



October 26, 2004

NRC-04-114
10 CFR 50 App. E

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852

Kewaunee Nuclear Power Plant
Docket 50-305
License No. DPR-43

Revision to Emergency Action Levels

Nuclear Management Company, LLC, (NMC) is transmitting for NRC review and approval, revisions to the Kewaunee Nuclear Power Plant (KNPP) emergency action levels (EALs). This revision implements a new emergency action level scheme based on NEI 99-01, Revision 4, "Methodology for Development of Emergency Action Levels," using the guidance of Regulatory Issue Summary (RIS) 2003-18, Supplement 1, "Use of Nuclear Energy Institute (NEI) 99-01, 'Methodology for Development of Emergency Action Levels,'" dated July 13, 2004.

The enclosed security EALs are in compliance with NEI 99-01, but are not aligned with the response to Security Order EA-03-086, dated April 29, 2004. NMC intends to remain in compliance with the NMC Security Order response, as modified by the threat advisories, until the enclosed EALs are approved. When the threat advisory EALs are approved, we will provide an update to reflect the final approved version.

The current EAL scheme in use at KNPP is based on NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

This request contains the following enclosures:

- Enclosure 1: Table of Contents
- Enclosure 2: Summary Explanation
- Enclosure 3: State/Local Government Official Agreement Documentation
- Enclosure 4: Detailed Justification
- Enclosure 5: Compact disk of Enclosures, References, and Supporting Documentation

These proposed EALs have been discussed and agreed to by applicable state and local government officials, and have been reviewed and approved by the Plant Operations Review Committee.

It is requested that the enclosed EAL Wall Chart and EALs listed in the Technical Bases be approved by November 1, 2005 with an implementation period of 6 months.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.



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

Enclosures (5)

cc : Administrator, Region III, USNRC
Project Manager, KNPP, USNRC
Senior Resident Inspector, KNPP, USNRC w/o enclosures
Electric Division, PSCW w/o enclosures