

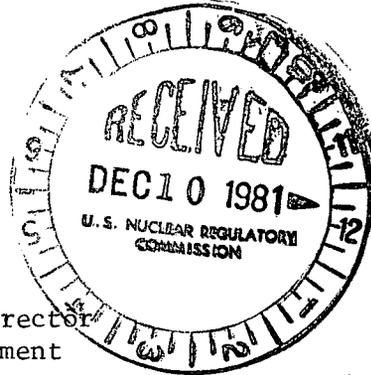
WISCONSIN PUBLIC SERVICE CORPORATION



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November 30, 1981

Mr. J. G. Keppler, Regional Director
 Office of Inspection & Enforcement
 Region III
 U. S. Nuclear Regulatory Commission
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Emergency Preparedness Appraisal

Reference: (1) Letter to E. R. Mathews from J. G. Keppler dated
 October 29, 1981

Enclosures 1 through 4 of the letter to E. R. Mathews from J. G. Keppler dated October 29, 1981 (Reference 1) addressed various aspects of the level of emergency preparedness at the Kewaunee Nuclear Power Plant as determined by the NRC during the on-site appraisal conducted June 8-19. The attached appendices to this letter address the corresponding attachments of the Reference 1 letter. Appendix A discusses our completed, or planned actions for improving each item identified as a significant deficiency; Appendix B is our response to Notice of Violation, dated October 28, 1981; Appendix C details our consideration of "appraisal improvement items;" and Appendix D addresses the evaluation report of the previously submitted emergency plan. Please note that our response to your Appendix D is not due until January 27, 1981, however, we have completed our response and are submitting it at this time.

A reissue of the Kewaunee Nuclear Power Plant Emergency Plan, dated November 1981, will be submitted in accordance with 10 CFR 50.54(q) on December 1, 1981.

Appendix E of Reference 1 addressed Open Items in our implementation of requirements contained within NUREG-0737 and NUREG-0654. We will keep your

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Mr. J. G. Keppler
November 30, 1981
Page 2

staff informed of our progress on these items at a later date in a separate correspondence.

In accordance with the requirements of 10 CFR 50.54(f) the information herein submitted is affirmed to be, to the best of my knowledge, true and accurate.

Very truly yours,

E. R. Mathews

E. R. Mathews, Senior Vice President
Power Supply & Engineering

snf

Attach.

cc - Mr. Robert Nelson, NRC Senior Resident Inspector
Mr. Jesse Pagliaro, US NRC
Mr. C. F. Riederer, PSCW

Subscribed and Sworn to
Before Me This 30th Day
of November 1981

Susan A. Fox

Notary Public, State of Wisconsin

My Commission Expires:
March 24, 1985

RESPONSE TO EMERGENCY PREPAREDNESS APPRAISAL FINDINGS

Letter of October 29, 1981

REFERENCES

1. Letter from E.R. Mathews to D.G. Eisenhower dated January 5, 1981
2. Letter from E.R. Mathews to D.G. Eisenhower dated April 13, 1981
3. Letter from E.R. Mathews to D.G. Eisenhower dated June 1, 1981
4. Letter from J.G. Keppler to E.R. Mathews dated June 22, 1981
5. Letter from E.R. Mathews to D.G. Eisenhower dated July 1, 1981
6. Letter from E.R. Mathews to D.G. Eisenhower dated September 10, 1981
7. Letter from E.R. Mathews to J.G. Keppler dated September 25, 1981
8. Letter from E.R. Mathews to S. Cohen dated October 22, 1981
9. Letter from J.A. Hind to E.R. Mathews dated November 9, 1981
10. Letter from E.R. Mathews to D.G. Eisenhower dated November 17, 1981
11. Letter from E.R. Mathews to J.G. Keppler dated November 20, 1981

Response to Appendix A - Significant Appraisal Deficiencies

Item 1 - Onsite Emergency Organization

- ° NUREG-0654, Rev 1, Table B-1, specifies minimum shift staffing and augmentation to provide for emergency situations. Our April 10, 1981 letter to Mr. D. Eisenhut (Reference 2) provided the NRC staff with an alternative on-shift staffing and our proposed method of augmented (30 and 60 minute) staffing. At the time of our Emergency Appraisal (June 1981), we had not received any word of the acceptability of our proposal. We understood from conversations with the Emergency Preparedness Appraisal Staff that our proposal would be unacceptable since we did not meet all of the specific functional requirements of Table B-1. Since that time we have reconsidered our position and have committed to meet all of the functional requirements in our letter to Mr. D. Eisenhut of Sept 10, 1981 (Reference 6). In both letters, and previous to that in our January 5, 1981 response to NUREG-0737 (Reference 1), we informed the staff that it would be impractical to meet the training requirements by the established date of July 1, 1982 and proposed alternate reasonable compliance dates.

In our concern to meet minimum shift staffing specified by Table B-1, we met with both NRR and I&E headquarters staff in Bethesda, MD on November 23, 1981 to convey our position in regard to this matter. Under their suggestion we are providing, under separate cover letter, the justification of our alternate compliance dates.

- ° Since the upgraded emergency planning requirements were proposed by the staff, we have planned on augmenting our on-shift staff with the use of a pager system.

At the time of the appraisal we had procured and assigned 60 pagers and had ordered another 60. We had not run an unannounced test at that time. Our intent is to assign enough pagers to personnel so that a minimum response would exceed Table B-1 requirements. Even though our cross training has not been completed (see our September 25, 1981 response to your Immediate Action Letter, Reference 7), our preliminary tests show that the total number of responding personnel exceeded the total number required by Table B-1. These tests included unannounced drills on weekday evenings, weekends, a Friday evening and a summer holiday. We do not anticipate the need for a formal on-call duty roster. We have shown, through unannounced drills, that we can meet the minimum augmented staffing of Table B-1.

Furthermore, specific procedures have been written to initiate the augmentation of the on-shift staff during an emergency situation. These procedures include:

- EP-AD-7 Unusual Event Notification
- EP-AD-8 Alert Notification
- EP-AD-9 Site Emergency Notification
- EP-AD-10 General Emergency Notification
- EP-AD-17 Communications
- EP-EOF-3 Corporate Response to an Unusual Event
- EP-EOF-4 Corporate Response to an Alert
- EP-EOF-5 Corporate Response to a Site Emergency
- EP-EOF-6 Corporate Response to a General Emergency

- ° Each emergency classification procedure (i.e., EP-AD-3 Unusual Event, EP-AD-4 Alert, etc.) states those responsibilities of the Emergency Director which cannot be delegated.

Item 2 Emergency Classification Scheme

- ° All Emergency Operating Procedures (E-O-P's) will be revised to include a precaution to operations personnel to review Emergency Plan Implementing Procedures to evaluate if the emergency response organization should be activated. This will be completed by March 1, 1982.
- ° Initiating conditions for emergency levels were reviewed, and observable and reliable indicators of plant parameters were incorporated into procedure EP-AD-2, Emergency Classification Determination, and the Emergency Plan (Table 4-1). This item was noted in the Immediate Action Letter (Reference 4) and found acceptable during the subsequent routine safety inspection (Reference 9).

Item 3 Emergency Communications

- ° A siren system is currently being installed to provide prompt alerting of residents within the emergency planning zone (EPZ) as specified in Appendix 3 of NUREG-0654. A detailed description of the alerting and notification system is included in the WPS submittal to Mr. J.G. Keppler, dated November 20, 1981. (Reference 11)

Item 4 Public Education and Information

- ° A brochure to inform resident and transient populations was developed and sent to all residents within 10 miles of the plant. The brochure was also posted (hand delivered) in various public locations. The brochure will be updated and disseminated annually. This item was noted in the Immediate Action letter (Reference 4) and found acceptable during the subsequent routine safety inspection (Reference 9).

Item 5 Emergency Facilities and Equipment

- ° Support procedures are in place for monthly inventories of Radiation Emergency Kits, First Aid Kits, Emergency Vehicle equipment and Site Access Facility equipment. Portable radiation monitoring equipment is source checked monthly and calibrated twice yearly. Additional support procedures for emergency survey/sampling kits, communications equipment and emergency response facilities equipment are under development and will be completed by March 1, 1982 or as equipment arrives.
- ° Specific environmental monitoring team survey/sampling kits will be assembled by January 1, 1982. Currently the equipment is readily available for the Environmental Monitoring Teams at the Site Access Facility (SAF). Additional Equipment has been ordered and will be incorporated after its arrival.
- ° Reference Appendix A, Item 6 response.
- ° In addition to the current PBX telephone system available in the Emergency Operations Facility (EOF), additional direct ringdown circuits are being

installed as a backup system to assure telephone access to the various Emergency Response Facilities. Commercial exchange lines have been installed for use by the NRC and State and local governments to provide communications to onsite and offsite locations without the use of the plant PBX system.

WPS has requested from the NRC the installation of several new links to the Emergency Notification system (ENS) and the Health Physics Network (HPN). This request is indicated in a letter from ER Mathews to Stuart Cohen (NRC) dated October 22, 1981. (Reference 8)

Item 6 Accident Assessment

- Procedure EP-RET-2C, Containment Air Sampling and Analysis, provides the method for obtaining and analyzing a post accident containment air sample. This sample is injected through a silver zeolite filter cartridge and analyzed for radioiodines using a multichannel analyzer.

- The plant sampling system provides for downstream sampling of the residual heat removal pumps when suction is being taken from the containment sump and core cooling is in a recirculation mode. This sample would be collected in the same manner as the reactor coolant hot leg or pressurizer liquid post-accident sample.

- Procedure EP-RET-2, Inplant Radiation Emergency Team, details immediate and subsequent actions of the Radiological Protection Director to assess the radiological consequences of the emergency. Specific

actions include (1) obtaining and recording area and process radiation monitor readings from the Control Room; (2) obtaining and recording current meteorological data; (3) performing effluent sampling and analyses; and (4) performing surveys of the plant interior and site.

Procedure EP-ENV-3A, Environmental Protection Director Actions and Directives specifies actions of the Environmental Protection Director to assess environmental consequences. Specific actions include (1) acquiring and recording environmental monitoring data at predetermined locations; (2) confirming projected plume pathway with actual plume pathway; (3) performing dose estimates; and (4) making protective action evaluations.

- ° Radiological accident assessment trend analysis is performed by three emergency response groups. The Radiological Protection Director receives periodic updates of plant area and process radiation monitor readings, and plant and site survey data. Plant gaseous effluent monitors and the Emergency Operations Facility monitor data are recorded and permit data retrieval for trend analysis. The Environmental Protection Director receives environmental monitoring team data on a continual basis for trend reviews. A Technical Support Center Staff member is assigned responsibility for maintaining a status sheet listing plant radiation monitor readings, meteorological conditions, and safety concerns, and performing continual review to follow trends.

- Refer to response to Appendix D, Item 8.

- Procedure EP-ENV-3F, Protective Action Recommendation Determination, will be issued to provide guidance to the Environmental Protection Director in performing protective action evaluations. Protective Action Guideline levels for soil, milk and water samples are specified.

- WPS has contracted a consultant to develop isopleth overlays for determining atmospheric diffusion factors (X/Q) within the ten mile EPZ. In conjunction with the existing DOSERATE computer program (EP-RET-6, Dose Projections) or use of the manual method (EP-ENV-3E, Manual Environmental Dose Projection Calculations), integrated dose and peak dose rates can be projected at any location within the ten mile EPZ. Overlays and implementing procedures are to be completed by January 1, 1982. A climatological study is in progress to support dispersion projections in the presence of a lake breeze. The results of that study, expected to be completed by March 1, 1982, will provide interim guidance until implementation of the Class A model.

- Twenty procedures have been issued detailing responsibilities and actions of the Environmental Monitoring Teams. These include procedures for plume track sampling (EP-ENV-3A), air sampling (EP-ENV-4B), measuring radioiodine (EP-ENV-5C), and issuing protective equipment (EP-ENV-3B and EP-AD-18). The meteorological system was repaired and

calibrated in response to the Immediate Action Letter (Reference 4) and found acceptable during the subsequent routine safety inspection. (Reference 9)

Item 7 Protective Response

- ° Directive ACD 12.9, Personnel Accountability, has been replaced by EP-AD-12, Personnel Assembly and Accountability. Emergency Response Facility activation procedures provide criteria for relocation of assembled personnel or assurance of habitability by the Site Radiation Emergency Team.

Procedure EP-ENV-6A, Relocation of Site Access Facility (for habitability reasons), details actions to be taken to cope with adverse wind conditions.

Procedure EP-SEC-3, Personnel Accountability (Initial and Maintaining), directs the Security Force to tour the areas outside the plant fence line (substation, sewage plant, substation) to alert personnel of the accountability check under way or the means by which to leave the area.

Item 8 Radiological Exposure Control

- ° Procedures detailing actions to implement an emergency radiological and environmental monitoring program are in place (EP-RET-4's and

EP-ENV's). These areas were noted in the Immediate Action Letter and found acceptable during the subsequent routine safety inspection (Reference 9).

- ° Procedure EP-AD-11, Emergency Radiation Controls, details the radiological control program to be implemented during a plant emergency. Procedure EP-RET-2D, Emergency Radiation Entry, Controls and Implementation, provides specific guidance to the Inplant Radiation Emergency Team for allowing controlled area entries. Containment air sampling, reactor coolant sampling and effluent sampling procedures (EP-RET-2C, EP-RET-3B and EP-RET-2B, respectively) have been revised to reflect potential accident conditions.
- ° An additional thirty (30) MSA self-contained pressure-demand breathing units and fifty (50) additional air cylinders have been purchased for plant emergency use. Consideration is being given to the installation of onsite cylinder refilling capability. In addition, WPS has a mutual assistance agreement with the Point Beach Nuclear Plant to provide support as needed.

Item 9

- ° Procedure EP-RET-2E, Handling of Injured Personnel, and EP-RET-2F, Personnel Decontamination, provide instructions for assisting contaminated, injured personnel. Lifesaving efforts take precedence over contamination control activities. Procedure EP-RET-8, Contamination

Control Measures at the Two Rivers Community Hospital, provides guidance to plant personnel interfacing with hospital employees.

Item 10 Recovery and Re-entry

- ° Procedure EP-AD-15, Recovery Planning, provides criteria and structure for the establishment of a recovery organization. The Assistant Manager-Nuclear Power is given the authority to relax protective measures and allow site re-entry.

Item 11 Training

- ° WPS is developing a formal training program for offsite governmental organizations and agencies in the area of Emergency Plans and Procedures. The training program is scheduled to be presented prior to March 1, 1982.
- ° A formal training program as outlined in the Emergency Plan has been established and incorporated into the General Plant Training Program. The computerized Administrative Document Retrieval System (ADRS) is being used for a record of qualifications and attendance. This area was an item in the Immediate Action Letter and found acceptable during the subsequent routine safety inspection.
- ° Security Force personnel are currently receiving instructions in emergency classification categories and their actions during a plant emergency (EP-SEC-2, Security Force Response to Emergencies). As part of their annual Health Physics Training, Security Force personnel will receive training regarding the effects of radiation on the body.

- ° Training of Health Physics personnel in post-accident containment air sampling (EP-RET-2C) has been completed. This area was an item in the Immediate Action letter and found acceptable during the subsequent routine safety inspection.

Item 12 Responsibility for Planning Effort

- ° Development of procedures and directives considered to be supplemental to the EPIPs will be completed by March 1, 1982. These supplemental procedures will include the review of the emergency plan and procedures to assure completeness and accuracy. Responsibilities and frequencies for the review are delineated in section 8 of the Emergency Plan.
- ° The Quality Assurance Directive (QAD 3.2) is currently being expanded to include an annual audit of the Emergency Plan; Emergency Plan Implementing Procedures, emergency response training, drill and exercise results, records management, and emergency equipment maintenance and inventory schedules. The results of the audit are reported to the Manager Nuclear Power, Plant Manager and the Nuclear Emergency Preparedness Coordinator. The audit is retained for a period of at least five years.

APPENDIX B - NOTICE OF VIOLATION

Response: Our initial corrective action taken was to review procedure RC-HP-180 both from a training aspect and required equipment aspect. In response to the former, we have completed training required for the HP staff (see our September 25, 1981 response to your Immediate Action Letter - Reference 7). Equipment necessary to support RC-HP-180 was ordered, has been received, and is available for use.

For long term corrective actions, we have taken those procedures necessary for emergency situations and grouped them together in a set of Emergency Plan Implementing Procedures (EPIPs). RC-HP-180 has been changed to EP-RET-2C. We are also currently developing a set of support procedures which will periodically check to ensure all necessary equipment and supplies are available for all the EPIPs. We expect to have this latter set of procedures developed and implemented by March 1, 1982.

RESPONSE TO APPENDIX C - APPRAISAL IMPROVEMENT ITEMS

Item 1

- ° Provisions for post-accident coolant system flushing or chloride analysis are not provided using the interim sampling procedure. However, the High Radiation Sampling Room under construction will have provisions for sample line flushing to allow the collection of multiple samples of primary coolant and for coolant chloride analyses. Support procedures and construction are expected to be completed by April 1, 1982.

Item 2

- ° Equipment in the emergency vehicle will be secured to eliminate potentially hazardous conditions to personnel during transit. This will be completed by January 1, 1982.

Item 3

- ° Personnel accompanying injured or contaminated individuals to support facilities will be instructed to take with them a high band two-way radio. Radio control consoles are located in the Shift Supervisor's Office and Radiation Protection Office. These radios have been tested and provided the needed range, unlike the low band radios in use during the appraisal team visit.

Item 4

- ° Offsite authorities are provided an unlisted telephone number that the duty officer may use to verify an emergency notification.

Item 5

- ° Procedure RC-C-84 has been modified to reflect potential accident conditions and entitled EP-RET-3B, Post-Accident Reactor Coolant Interim Sampling Procedure. Precautions to ensure that protective clothing, equipment and dosimetry requirements are understood have been added. This interim sampling procedure will initially be used during all emergencies until coolant activities are shown to be low enough to allow for the use of the normal sampling procedures. Sample analysis results are reported to the Radiological Protection Director who relays the information to the Emergency Director. This procedure will be revised to include provisions for sample labeling by January 1, 1982.

Items 6, 7 and 8

- ° Reference Appendix C, Item 5.

Item 9

- ° All personnel with unescorted plant access are given instructions on the location of emergency assembly areas. This topic is also included in the annual emergency training program.

Item 10

- ° Directive ACD 12.9 has been replaced by EP-AD-12, Personnel Assembly and Accountability, which is immediately implemented for a Site Emergency or General Emergency, or at the discretion of the Emergency Director. The Security Force procedure (EP-SEC-3) states that accountability status should be reported to the Emergency Director within 30 minutes of initiation.

Item 11

- ° Reference Appendix C, Item 1.

Item 12

- ° Procedure RC-HP-180 has been replaced by EP-RET-2C, Containment Air Sampling and Analysis. This procedure would be implemented during all plant emergencies until the containment air sample activity was shown to be of low enough activity that normal sampling procedures could be safely performed. The radioiodine sampling is accomplished by passing a containment air sample through a silver zeolite filter in the Hot Chemistry Laboratory with the downstream exhaust directed into a negative pressure fumehood. Filters are available in the adjacent counting room. Air flow for sample deposition is approximately 60 l/min; this is equivalent to a normal air sample pump flow rate and radioiodine blowby should not occur. The small activity samples allow counting using the existing multi-channel analyzer. calibration. Sample analyses results are reported to the Radiological Protection Director, who relays the information to the Emergency Director.

Item 13

- ° Procedure EP-AD-14, Search and Rescue, has been issued providing instructions for locating missing persons.

Items 14 and 15

- ° Details on the performance of the personnel accountability check are provided in procedures EP-AD-12 and EP-SEC-3. The Security Director is responsible for reporting the results of the accountability check to the Emergency Director.

Item 16

- ° The Public Information Department will provide instruction and tours to media personnel on an annual basis to enable them to gain experience in using media facilities. This will include the Emergency Plan and points of contact for release of public information during an emergency (Reference Emergency Plan, Section 8.5.2).

Item 17

- ° Emergency planning and coordination responsibilities are detailed in the Emergency Plan and will be included in the personnel job descriptions under development.

Item 18

- ° Plant personnel responsible for emergency planning (Plant Manager, Plant Services Superintendent, Technical Supervisor) are included in PORC and budget meetings.

Item 19

- ° Sections 5 and 8 of the Emergency Plan describe the interaction between site and corporate emergency response personnel. The responsibilities regarding emergency planning and preparedness are delineated in the Emergency Plan.

Item 20

- ° Selection and Qualification criteria for personnel are being developed as part of the overall corporate program for standardization of job descriptions

and also in response to our INPO evaluation. Our normal organization forms the basis for our emergency organization and wherever possible the two organizations are parallel. Therefore, the emergency function criteria are implicitly incorporated into the program, since the job description format establishes the education or experience levels needed to fill the position.

Item 21

- ° Reference Appendix C, Item 19.

Item 22

- ° WPS agrees with this recommendation, and will evaluate seminars scheduled to assure that the training is of sufficient quality to ensure that people responsible for emergency planning and coordination maintain their state of the art knowledge. Annual training will be provided if:
 - a) Quality programs are available.
 - b) Work of significantly more importance (i.e. outage) does not preclude attendance.

If annual training is not possible for each individual each year, every effort will be made to assure that training is provided every two years.

Items 23, 24, and 25

- ° Reference Appendix C, Item 12.

Item 26

- ° As part of our radiation monitoring upgrade, a permanent area monitor is being installed near the interim post-accident containment air sample collection point and in the High Radiation Sample Room. This is scheduled for completion by January 1, 1982.

Item 27

- ° Reference Appendix C, Item 12.

Item 28

- ° WPS believes that letters of agreement currently maintained with various offsite organizations and agencies need not contain a detailed description of the concept of operation, authorities and responsibilities. Most of the agencies with which WPS has support agreements also have their own emergency plans which gives the details requested. Those agencies not having formal emergency plans simply agree to furnish available equipment and personnel to WPS upon request. The letter of agreement is therefore a commitment to respond, and not a detailed description of the concepts of operation (see Appendix D of the Emergency Plan).

Item 29

- ° The lines of succession for each of the directors of emergency functions are specified in the EIPs (EP-AD-1, EP-AD-7 through 10 and EP-EOF-3 through 6). Table 5-1 of the Emergency Plan also details the lines of succession for each director position.

Item 30

- ° EP-SEC-2, Security Force Response to Emergencies, includes provisions for personnel obtaining Site Access Facility (SAF) keys. EP-RET-4, Site Radiation Emergency Team, specifies that a radiation survey of the facility be performed.

Item 31

- ° Maps detailing predesignated sampling points are located in the Technical Support Center and the Emergency Operations Facility. Predesignated sampling points can be indicated on the base maps being produced for WPS. These maps will be consistent with Table J-1 of NUREG-0654 and will be located in the various emergency response facilities. Inclusion of sampling points will depend on the relevance to that facility (SAF map will include sampling points).

Item 32

- ° The radiological monitoring system upgrade includes provisions for installation of two Eberline SPING units. One unit will monitor the auxiliary building exhaust and the other unit will monitor the reactor building stack. Complete installation of the units is scheduled for January 1, 1982, with support procedures completed by February 1, 1982.

Items 33 and 34

- ° Reference Appendix C, Item 28.

Item 35

- ° Procedure EP-RET-2, Inplant Radiation Emergency Team, contains a list of priority duties for health physics personnel during an emergency.

Item 36

- ° The establishment of Emergency Plan Implementing Procedures (EIPs) has reduced the extensive amount of cross-referencing needed previously. The EIPs will be reviewed as support procedures are developed to ensure appropriate cross-referencing. This will be completed with support procedures by March 1, 1982.

Item 37

- ° Reference Appendix C, Item 28.

Item 38

- ° EP-RET-2F, Personnel Decontamination, will be revised to include a 1000 dpm action level for decontamination; this is roughly 100 cpm above background with our existing frisking equipment.

Item 39

- ° Personnel responding to the site for support functions stop at the Site Access Facility and must contact the plant radiation protection group for plant radiological conditions and protective equipment requirements.

Item 40

- ° EP-RET-2D, Emergency Radiation Entry, Controls, and Implementation, provides instructions for health physics personnel to brief emergency repair teams.

RESPONSE TO APPENDIX D - EMERGENCY PREPAREDNESS EVALUATION REPORT

Item 1

- WPS has a contract with the City of Kewaunee which commits the services of the Kewaunee Fire Department to provide backup fire protection as required to the Kewaunee Nuclear Power Plant. The contract details service charges and contractual agreements which WPS believes should not be included in the Emergency Plan. WPS will make the contract available for inspection upon request.

Item 2

- Responsibilities which the Emergency Director may not delegate are specified in section 5.2.1 of the Emergency Plan.
- The lines of succession for all the directors in the Emergency Response Organization are detailed in Table 5-1 of the Emergency Plan.
- Refer to Appendix A, Item 1.
- Refer to Appendix A, Item 1.
- The interface between the onsite emergency organization and the WPS headquarters support are detailed in section 5.2.3 of the plan with a block diagram (Figure 5-3) provided to express the interface.

- ° Section 5.2.3 of the plan delineates the corporate headquarters support functions. Appendices AI-AIV define primary responsibilities of the corporate directors.

Item 3

- ° Section 5.2.1 of the Emergency Plan details the responsibilities of the Emergency Response Manager, which includes the authorization to request federal assistance. Plant specific times of arrival are not available from DOE, however a brief summary of DOE radiological response capability was prepared by the EG&G Measurements Group in Las Vegas, Nevada in response to a Pennsylvania request for information. General response times vary from a few hours to 48 hours, depending on the magnitude of assistance required. The report will be made available upon request.

Item 4

- ° A standard emergency classification and action level scheme has been upgraded to include specific instrument readings. The table is included as Table 4-1 in the Emergency Plan and also in the Emergency Plan Implementing Procedures (EP-AD-2).

Item 5

- ° Section 6.8 outlines the general methodology for notifying the NRC, State and local emergency response organizations and the general public. A comprehensive communication system with backup capabilities, which provides the means for notification, is detailed in section 7.2 of the Emergency Plan.

- ° The content of followup messages to offsite authorities is detailed in section 6.8.2 of the plan.

- ° WPS addressed NUREG-0654, Appendix 3, in Reference 11, dated November 20, 1981. Efforts to refine the notification scheme are ongoing as evidenced by a joint NRC, FEMA, State of Wisconsin, affected counties, WEPCO and WPS meeting held November 20, 1981. Until such time that a notification system other than the Emergency Broadcast System is available, the description provided is correct. Also see response to Appendix A, Item 3.

- ° The followup messages from the Kewaunee Nuclear Power Plant to the appropriate State and County agencies will provide the supporting information for the prepared text messages in the County plans, as detailed in section 6.8.2 of the plan.

Item 6

- ° Initial notification of emergency response personnel and appropriate Federal, State and local agencies is directed by the Shift Supervisor upon declaration of an emergency. The Shift Supervisor may designate the Shift Technical Adviser as a communicator to conduct the initial notification. A Shift Supervisor is onsite at all times and a Shift Technical Adviser is onsite at all times during plant operation, thereby providing the capability for 24 hour per day notification (section 5.2.2 of the Emergency Plan).

- ° See response to Appendix C, Item 3.

Item 7

- ° See response to Appendix A, Item 4.

Item 8

- ° The revised Emergency Plan addresses in detail the in-place centers and those features either currently in-place or soon to become available. Facilities with operational dates in 1983 are not described (e.g. Safety Parameter Display System, Class A meteorological models) in this issue.
- ° See response to Appendix A, Item 1.
- ° A detailed discussion of Geophysical Phenomena Monitors, Radiation Monitoring Systems, Fire Detection and Suppression Equipment, and Laboratory Facilities is included in section 7.3.1 of the Emergency Plan. The offsite assessment facilities and equipment available for use by WPS are included in section 7.3.2 and Appendix D of the Emergency Plan (Letters of Agreement).
- ° The revised Emergency Plan commits to providing a new meteorological system in accordance with Appendix 2. Reference 5 committed to provide a description of the system by January 1, 1982 in accordance with revised requirements of NUREG-0737. WPS has had ongoing discussions with members of the NRC headquarters staff concerning acceptable siting of a new system and Class A

dispersion models. Additional information was supplied to the staff in Reference 10. We believe our current schedule for compliance meets NRC guidance.

- ° A description of the Operational Support Facility (OSF) is detailed in section 7.1.5 of the plan. A list of equipment available in the OSF is included in appendix F (Emergency Equipment and Supplies). Entry to the controlled area will either be through the Radiation Protection Office (RPO) or the Radiological Analysis Facility (RAF). Both the RPO and the RAF have portable radiation monitors and protective clothing to support controlled area entries.
- ° Emergency equipment and supplies for the various emergency response facilities are listed in Appendix F. Portable radiation monitoring equipment included in these inventories is calibrated in accordance with approved procedures. Procedures are currently being developed to supplement the EIPs and the Emergency Plan. The emergency equipment will be inventoried and inspected quarterly and after each use.
- ° A discussion of communication equipment is provided in section 7.2 of the plan. The details of the site and offsite emergency communication networks are illustrated in Figures 7-1 and 7-2. The supplemental procedures mentioned above will provide testing and inspection requirements for the communications equipment.

- ° The completion date for the Radiological Analysis Facility (RAF) will be addressed in a NUREG-0737 implementation status update within the time period identified for Appendix D items. The revised Emergency Plan contains an updated description of the RAF.

Item 9

- ° A discussion of the methods for source term estimation is included in section 6.2.2 of the Emergency Plan.
- ° An Emergency Classification and Action Level Scheme (Table 4-1 and EP-AD-2) identifies plant system and effluent monitor readings characterizing off normal conditions. The classification determines the amount of response necessary within the emergency organization. The Kewaunee Plant Final Safety Analysis Report (FSAR) analyzes various off normal conditions and accidents.
- ° Methods for determining onsite and offsite exposures are discussed in sections 6.2.3 and 6.2.4 of the Emergency Plan. The methods include using effluent monitor readings as an input for predicting exposures.
- ° Access to meteorological information by offsite agencies, at the present time, is limited to telephone contact with either the Control Room or Technical Support Center. In Reference 3, WPS described, in concept, the Emergency Response Facility (ERF) data system, scheduled for operation in October 1983. Reference 5 advised you of our intention to integrate the

meteorological requirements with the ERF computer system. This system will support offsite interrogation of meteorological data and display devices in WPS ERFs.

The details of this access are not included in this issue of the Emergency Plan. As design information is made available, and prior to operation of the system, the Emergency Plan will be revised to reflect the new status.

- ° The instrumentation provided on potential release paths (e.g. Aux Bldg Exhaust Stack) has been specifically analyzed for maximum source terms such that offscale readings (hi) are not possible. If offscale low, radioactive concentrations are below minimum required offsite action levels. If the instrumentation fails, the backup means of performing dose projections is by isotopic analysis, X/Q determination, and dose calculation, all performed using EP-RET and EP-ENV procedures. Furthermore, redundant instrumentation is being installed per NUREG-0737, long-term TMI requirements. As this equipment becomes operational, procedures will be developed to facilitate offsite dose projections.
- ° Field monitoring within the plume exposure pathway will be performed by the Environmental Monitoring Teams (EMT). The EMT members will be notified by the pager system. Field team composition, equipment, and expertise to make rapid assessments are discussed in section 6.2.4 of the plan. Procedures EP-ENV-1 through 6 have been developed to provide guidance to the EMT in sample acquisition and assessment methods.

- ° The methodology for detecting and measuring iodine concentrations in the air as low as 1×10^{-7} uCi/cc is detailed in implementing procedures, specifically EP-ENV-4B and EP-ENV-5C.
- ° Field monitoring within the plume exposure pathway will be performed by the Environmental Monitoring Team(s) as detailed in section 6.2.4 of the Emergency Plan and appropriate EIPs.
- ° Sections 6.2.2 and 6.2.3 of the plan discuss methods used to relate measured parameters and sample analyses to dose rates.

Item 10

- ° The time required to alert onsite individuals, and the means to do so, are discussed in section 6.4.1 of the Emergency Plan.
- ° Section 6.4.1 discusses the evacuation of onsite non-essential personnel and provides for monitoring of all evacuees for contamination. Section 6.6 discusses measures that will be used to control contamination and section 6.7.2 details the areas and equipment available for decontamination.
- ° Same as above.
- ° Personnel Accountability (section 6.4.1 of the Emergency Plan) is the responsibility of the Security Director with assistance from the assembly area coordinators. EIPs have been developed to accomplish personnel accountability within 30 minutes.

- ° Use of protective clothing, radioprotective drugs and respiratory protection devices are discussed in section 6.5 of the Emergency Plan.

- ° a) Maps showing evacuation areas and routes are included in the public information brochure discussed in response to Appendix A, Item 4. Congregate care centers for relocation of evacuees are indicated in Appendix H of the Emergency Plan. Maps indicating predesignated sampling points are discussed in the response to Appendix C, Item 31.

- b) Figures showing population distribution are included in Appendix C of the Emergency Plan (Figures C-3 and C-4).

- c) The means for notifying all segments of the plume exposure pathway transient and adult populations have been established. A siren system activated by the Manitowoc and Kewaunee Sheriffs is discussed in the response to Appendix A, Item 3. The siren system is the alert signal to turn to radio or TV stations listed in the public information brochure. The State of Wisconsin, through EBS or a similar system, will provide information to these stations for broadcast simultaneously with, or prior to, the direction to activate the sirens.

- m) The bases for the choice of recommended protective actions are consistent with those suggested by the US Environmental Protection Agency's "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents EPA-520/1-75-001, September 1975." The bases are presented in Tables 6-1 through 6-6 of the Emergency Plan. Evacuation Time Estimates are included in the Emergency Plan's Appendix H.

Item 11

- ° The emergency exposure criteria presented in Table 5.3.1 (Table 6-6 in the revised Emergency Plan) is consistent with the EPA guidelines referenced above. Allowing exposures in excess of 10CFR20 is a responsibility that the Emergency Director may not delegate (section 5.2.1 of the Emergency Plan) and it is his responsibility to determine which criteria (Corrective/Protective Actions or Life Saving Actions) is in effect and therefore which exposure limit applies.
- ° The onsite radiation protection program is described in section 6.7.1 of the Emergency Plan. Included in this section are Emergency Exposure Criteria and Records Control.
- ° A Radiation Technologist is onshift at all times and is capable of processing TLDS and determining doses received by personnel. In an emergency situation, dosimetry service for all emergency response personnel will be provided on a 24 hour per day basis (section 6.7.1 of the Emergency Plan).
- ° Action Levels for the need to decontaminate people, material and equipment are discussed in sections 6.6 and 6.7 of the Emergency Plan.
- ° Drinking water and food supplies are not allowed in contaminated or potentially contaminated areas. If the potential for contamination exists in areas containing drinking water or food, the area and food/water will be surveyed. If contamination is discovered, appropriate actions will be taken based on the level and location of the contamination (section 6.6.1 of the Emergency Plan).

- A discussion on the locations equipped to perform decontamination of onsite personnel is included in section 6.7.2 of the Emergency Plan.

Item 12

- Recovery operations will be conducted to restore the plant to normal operating conditions. General plans for recovery and re-entry are included in section 9 of the Emergency Plan.

Item 13

- Section 8.2.2 of the Emergency Plan details the frequency and extent of offsite authority participation in exercises to be conducted at the Kewaunee Plant. WPS takes exception to performing backshift or unannounced exercises. Exercises conducted at these times are impractical and do not increase the degree of emergency preparedness.
- Examples of drills that will be conducted and their frequency are discussed in section 8.2.2 of the Emergency Plan.
- Discussion of drills is in section 8.2.2 of the Emergency Plan.
- Observers from Federal, State and local governments will be invited to observe and critique the exercise as described in section 8.2.2 of the plan.
- The Emergency Plan and EIPs are reviewed and updated annually. Responsibilities for these efforts are included in section 8.3.1 of the plan.

Item 14

- ° The training of personnel from offsite emergency response organizations is detailed in the Specialized Training portion of section 8.2.1 in the Emergency Plan.
- ° Deficiencies noted during practice drills will be immediately corrected and documented by the instructor as detailed in section 8.2.1.
- ° Section 8.2.1 describes the Emergency Preparedness Training Program and Table 8-1 provides a matrix that separates the Emergency Response Organization into eleven groups to better assign specialized training (See reference 9).

Item 15

- ° See response to Appendix C, Item 22.
- ° The forwarding of plan changes to appropriate individuals has been incorporated into the Emergency Plan, section 8.
- ° Appendix D now includes some additional letters of agreement with offsite agencies. WPS feels the additional agreements provide added assurance of receiving assistance as required.
- ° This has been incorporated into section 8 of the plan. See response to Appendix A, Item 12.
- ° Phone numbers will be updated quarterly (Emergency Plan, section 8).