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 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests one-time exemption from annual exercise requirement
 of 10CFR50, App E for 820223-831101. Proposed date of 831101
 will not decrease effectiveness of program.

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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

June 24, 1982

Dr. Harold R. Denton, Director
Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Denton:

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

References: (1) Letter from NRC to E. R. Mathews dated May 12, 1982
(2) Letter from C. J. Paperiello to E. R. Mathews dated April 23, 1982

On April 21, 1982, a meeting was held at the O'Hare International Airport in Chicago, Illinois to discuss the scheduling of emergency preparedness exercises at nuclear power plants. In attendance were representatives from the NRC, FEMA, States and Utilities in the NRC Region III area. The purpose of the meeting was to establish a schedule for future emergency preparedness exercises that would be agreeable to all parties involved.

At the April 21 meeting, a date of November 1, 1983 was proposed as the most acceptable date to conduct the next exercise at the Kewaunee Plant. While this date was acceptable to the meeting participants (NRC included), formal approval is needed for an extension beyond the annual requirement of 10CFR50, Appendix E (reference 1).

It is realized that participation in emergency planning exercises creates time conflicts with normal job requirements for all personnel. Kewaunee Plant personnel have many activities that annually require their time and effort such as the annual refueling outage in spring, control operator requalification in summer, etc. Off-site support agencies also have various scheduled activities that may prohibit their ability to participate in an exercise as scheduled.

WPSC conducted an emergency planning exercise at the Kewaunee Plant on February 23, 1982 and by NRC requirements, as clarified at the meeting, is required to run another exercise within a year \pm 25% (15 months). This requirement would necessitate another exercise prior to May 23, 1983. We believe the November 1, 1983 exercise date will not decrease the effectiveness of the Kewaunee Plant emergency

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preparedness program and is justified for the following reasons:

- 1) In January of 1981, Manitowoc County, Kewaunee County, the State of Wisconsin and FEMA fully activated their emergency organizations in response to simulated emergency conditions at the Kewaunee Plant. All agencies involved received favorable reviews.
- 2) Wisconsin Public Service Corporation personnel participated in an emergency exercise at the Kewaunee Plant on February 23, 1982 with communication contacts to supporting agencies. WPS demonstrated an acceptable level of preparedness as detailed in reference 2.
- 3) On March 10, 1982, Kewaunee County, Manitowoc County, the State of Wisconsin, FEMA and the NRC participated in a full scale exercise with the Point Beach Nuclear Plant. The support agencies again proved an acceptable emergency preparedness program.
- 4) A fall exercise date will provide a variety of weather conditions to test personnel performance.
- 5) WPS has made extraordinary efforts to upgrade the emergency preparedness program at the Kewaunee Plant. In addition to the aforementioned exercise was the complete rewrite of the Emergency Plan, development of over 80 implementing procedures, the construction of a new Technical Support Center and a new Emergency Operations Facility, and the development of an expanded training program which provided intense training for all emergency response personnel.
- 6) Emergency Preparedness will be maintained by emergency response personnel by an annual refresher training program. This refresher program will be implemented during the interim time period to the November 1, 1983 exercise.
- 7) The Emergency Response Facility computer system is scheduled for installation in October 1983. A November 1983 exercise date will enable emergency response personnel to have "hands-on" training with the new system.

Based on the considerations presented above and discussion during the April 21, 1982 meeting, WPS proposes a date of November 1, 1983 for our next emergency planning exercise at the Kewaunee Plant.

We therefore request a one-time exemption from the annual exercise requirement of 10CFR50 Appendix E, Section F for the period of February 23, 1982 to November 1, 1983. WPS will resume its annual exercise schedule after the November 1983 exercise in accordance with the above regulation. This one-time exemption will enable the development of a permanent schedule to best satisfy the time requirements of all involved personnel. We request your prompt attention to this matter as the results will affect the exercise planning and scheduling of many organizations.

Very truly yours,



C. W. Giesler
Vice President - Nuclear Power

Dr. Harold R. Denton

June 24, 1982

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cc - Mr. Robert Nelson, NRC Sr. Resident Inspector
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