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 GRIMES,B. Division of Emergency Preparedness

SUBJECT: Informs that exception to NUREG-0654, Item N.1.b re
 exercises conducted during off-normal hours is justified.
 NUREG-0654 exceeds requirements stated in 10CFR50, App E.

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WISCONSIN PUBLIC SERVICE CORPORATION


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

June 25, 1982

Mr. Brian Grimes
 Director of Emergency Preparedness
 U. S. Nuclear Regulatory Commission
 7920 Norfolk Avenue
 Bethesda, MD 20014

Dear Mr. Grimes:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Off-Hours Exercises

Recently WPS has been requested to address guidelines that were presented in NUREG-0654 "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." Specifically, Section N.1.b which requires "start an exercise between 6 P.M. and midnight, and another between midnight and 6 A.M. once every six years...Some exercises should be unannounced."

We feel that exercises conducted during off-normal hours do not provide an increase in the level of preparedness commensurate with the risks and inconvenience it causes. The risk of serious injury to responding personnel is increased during off-normal hours due to travel required under limited visibility conditions. This point is of great concern to Wisconsin Public Service Corporation (WPS). WPS has established a fine working relationship with the affected counties (Manitowoc and Kewaunee) which may be jeopardized by imposing further inconveniences on voluntary emergency response personnel.

WPS believes that this exception to Item N.1.b of NUREG-0654 is justified since emergency preparedness is assured during off-normal hours. This assurance is demonstrated by the following:

- 1) Diverse communication networks are in place which are checked frequently and demonstrated annually.
- 2) The counties have shown their willingness and ability to respond and there is no reason to assume they would not during off-normal hours.
- 3) Potential problems caused by off-normal hours have been considered in development of the plan and procedures (office phone, home phone, Emergency Hotline number, etc.)

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- 4) WPS personnel are available to respond and can be reached through normal telephone channels or through a pager system. (Reference: Procedures EP-AD-7 thru 10)

To assure communications links, unannounced "1st level" communications checks will be performed on a quarterly basis. The communication check will require plant personnel to notify the Manitowoc and Kewaunee county sheriff's dispatcher and the State Department of Emergency Government - Duty Officer and provide a message. The communication check would be complete and successful when the respective dispatcher/duty officer returns our initiating call (within a 15-minute period) and demonstrates an understanding of the original message. We believe proof of this initial notification capability will assure a path of further off-site agency activation if warranted.

WPS does not intend to mobilize any personnel during these checks and does not expect mobilization of any of the support agency personnel. The purpose of the check is to test the notification mechanism to appropriate support agency directors who in turn could mobilize their personnel if necessary.

We believe our emergency preparedness program has been proven successful, including off-site agencies who have proven their competence whenever called upon. Therefore, we feel that we are in compliance with the regulation as stated in 10CFR50, Appendix E, Section IV.F.1 thru 3. In keeping with the fact that NUREG-0654 is a guidance document our commitment, as explained in this letter, exceeds the requirements stated in 10CFR50, Appendix E. This method of compliance has been discussed with our Region III reviewer and we will make it effective within thirty (30) days after receipt of review or resolution of outstanding items.

Very truly yours,



Carl W. Giesler
Vice President - Nuclear Power

js

cc - Mr. C. Paperiello - NRC, Region III
Mr. J. A. Pagliaro - NRC, Region III
Mr. Robert Nelson - NRC Sr. Resident Inspector