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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service      05000305  
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 HINTZ, D.C.      Washington Public Power Supply System  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
                                  Region 3, Office of Director

SUBJECT: Forwards Rev 5 to emergency plan. Description of changes & safety evaluation encl.

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NOTES: *Revised 4/8/85 EJR*  
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**WISCONSIN PUBLIC SERVICE CORPORATION**  
P.O. Box 1200, Green Bay, WI 54305



March 20, 1985

Regional Administrator  
U. S. Nuclear Regulatory Commission  
Attn: Incident Response Center  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Emergency Plan Revision 5

Reference: 1) Letter from L. R. Greger to D. C. Hintz dated October 19, 1984

In accordance with the requirements of the Kewaunee Nuclear Power Plant Emergency Plan, we must perform an annual review of the plan and provide updates to reflect the current status of our emergency preparedness program.

A description of the changes, the safety evaluation, and copies of the revised pages are included as Attachments 1 and 2 to this letter. These changes do not decrease the effectiveness of the plan, therefore, they are made in accordance with 10 CFR 50.54q and prior Nuclear Regulatory Commission approval is not required. As requested in reference 1 we hereby submit three copies of this cover letter and attachments.

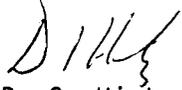
Pursuant to 10 CFR 50, Appendix E, two copies of this letter are hereby submitted to the Document Control Desk, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555.

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Please remove and discard the affected pages and insert the revised pages as instructed on the revision sheet (Attachment 2). Please sign and return the revision sheet to assure us that you have received your copy.

Very truly yours,



D. C. Hintz  
Manager - Nuclear Power

DSN:jks

Attachment

cc - Document Control Desk, US NRC - w/attachment (2)  
Mr. Robert Nelson, US NRC - w/o attachment  
Mr. S. A. Varga, US NRC - " "  
Mr. William Snell, US NRC - " "  
Mr. R. S. Cullen, PSCW - " "

Attachment 1

To Letter from D. C. Hintz to Incident Response Center

Dated March 20, 1985

DESCRIPTION OF CHANGES AND SAFETY EVALUATION

Record of Revisions and Pages i-vi

Description of Change

Added revision 5 to the table of revisions and revised Table of Contents to reflect the changes made in this revision to the plan.

Safety Evaluation

Since the changes are administrative in nature, these changes do not decrease the effectiveness of the plan.

Page ix

Description of Change

A Policy Statement with signature of upper corporate management has been added as requested by the Institute for Nuclear Power Operations (INPO).

Safety Evaluation

The inclusion of the policy statement further emphasizes upper management support for the Emergency Preparedness Program therefore the change does not decrease the effectiveness of the Plan.

Pages 1-3

Description of Changes

The overall responsibility for emergency preparedness was changed from Vice President, Nuclear Power to Manager, Nuclear Power to reflect a recent organizational restructuring.

Safety Evaluation

Since the change is administrative in nature, the change does not decrease the effectiveness of the Plan.

Pages 1-4, 1-11, 1-12, 1-14, and 1-15

Description of Changes

Several minor grammatical errors were corrected and the definition of the "Radiation Protection Training Manual" has been relocated to its proper alphabetical location.

### Safety Evaluation

Since the change is administrative in nature, the change does not decrease the effectiveness of the Plan.

### Pages 1-8 and 1-13

#### Description of Changes

The definitions of the "Environmental Liaison" and the "Recovery Manager" were added based on the upgrade of the recovery philosophy (Sect. 9).

#### Safety Evaluation

The addition of these definitions provides additional information and therefore does not decrease the effectiveness of the plan.

### Page 1-9

#### Description of Change

The level at which the Joint Public Information Center (JPIC) will be activated has been changed from "Site Emergency" to "Alert".

#### Safety Evaluation

The activation of the JPIC at the Alert level will ensure JPIC availability should conditions escalate quickly. Since the change provides for JPIC activation at a lower event classification the change will not decrease the effectiveness of the plan.

### Pages 2-5 and 2-6

#### Description of Change

Added three ambulance companies to the list of local support services on Page 2-5 and added the "NRC" block to indicate direct interface with the EOF on Page 2-6. Figure 2-1 previously appeared on page 2-7. Page 2-6 previously was blank. Figure 2-1 now appears on page 2-6 and page 2-7 has been deleted.

#### Safety Evaluation

Since the change is administrative in nature, the change does not decrease the effectiveness of the plan.

Pages 4-2, 4-4, 4-5 and 4-6

Description of Changes

Corrected typographical errors and revised the reference to the State of Wisconsin emergency response plan to reflect the change in the document's title. Also changed purpose #3 on page 4-4 to state that all facilities will be activated at the Alert level.

Safety Evaluation

Since all facilities are now activated at the Alert level we will be better prepared for the events which have quickly escalating emergency classifications. This change does not decrease the effectiveness of the plan.

Pages 5-4, 5-20, 5-21, 5-22, 5-24, 5-30, 5-33

Description of Changes

Several minor administrative changes (personnel and document title changes, cosmetic change to Figure and spelling corrections) have been made.

Safety Evaluation

Since the changes are administrative in nature, the changes do not decrease the effectiveness of the plan.

Pages 5-8 and 5-9

Description of Change

The "Notification/Communication" section was rewritten to better define how notifications to offsite agencies and WPS emergency response personnel will be accomplished. The positions of "Notifier" and "Control Room Communicator" have been incorporated and their functions have been defined.

Safety Evaluation

In a letter from D. C. Hintz to Document Control Desk dated December 17, 1984 we informed the Commission of our proposed method of upgrading the notification/communication activities during an emergency. By letter from C. J. Paperiello to D. C. Hintz dated January 9, 1985 we were informed that our proposed method is acceptable. The revision to the notification process will remove the notification/communications burden from the Shift Supervisor and Control Room Supervisor during an event. The change does not decrease the effectiveness of the plan.

Page 5-15

Description of Change

The statement indicating that "Letters of Agreement" are included in Appendix D has been revised to state that the letters are referenced in Appendix D. The letters of agreement are filed in the Emergency Plan Files in the WPS Corporate Office.

Safety Evaluation

The revision was made to prevent possible misinterpretation of the location of letters of agreement. The actual location of the letters has not changed therefore the change does not decrease the effectiveness of the plan.

Page 5-31

Description of Change

The block diagram was revised to remove the "TRAINEES" block from the diagram since these individuals are not always on Shift.

Safety Evaluation

When determining minimum Shift Staffing requirements no credit was taken for the trainees that might be on shift. The revision to the table removes any possible misunderstanding of the normal shift complement. The change is administrative in nature and does not decrease the effectiveness of the Plan.

Page 6-2

Description of Change

The statement regarding "pagers" was revised to read "radio pagers" for clarification.

Safety Evaluation

Since the change is administrative in nature, the change does not decrease the effectiveness of the plan.

Pages 6-5 and 6-6

Description of Change

Page 6-5 was revised to better define the responsibilities for dose assessment and incorporate the fact that environmental sampling will be performed to confirm and adjust initial dose projections.

Page 6-6 was revised to reflect a change in using grid coordinates on the field maps rather than the predetermined sample points for environmental data collection. The information collected will now be forwarded to the EOF directly rather than routing the information through the SAF.

The reference to use of silver zeolite cartridges and SAM II was deleted from this section. Specific details on the equipment used is more appropriately included in the procedures.

#### Safety Evaluation

Evaluations of the data collection and transmissions process has resulted in the above changes.

The use of grid locations on field maps provides for more flexibility in determining sample point locations. The transfer of data directly to the EOF without the SAF interface will ensure timely and accurate data transfer to the Environmental Protection Director. The Site Access facility will continue to be used for the receipt and analysis of field monitoring data and will serve as an equipment supply center for field monitoring activities.

Since the changes are expected to more accurately identify sample point locations and provides for more timely data transfer to the Environmental Protection Director, the changes will not decrease the effectiveness of the plan.

#### Page 6-7

##### Description of Change

Due to the revisions to page 6-6, page 6-7 was revised to reflect the "carryover" from page 6-6.

##### Safety Evaluation

Since the changes are administrative in nature, the change does not decrease the effectiveness of the plan.

#### Page 6-20

##### Description of Change

The statement regarding medical transportation was revised to reference the use of the local ambulance service should immediate professional help be necessary.

##### Safety Evaluation

The revision better defines the available methods for the transport of injured personnel, therefore the change does not decrease the effectiveness of the plan.

Pages 6-32 and 6-33

Description of Change

Figures 6-1 and 6-2 have been revised to incorporate the Notifier and Control Room Communicator positions to the notification block diagram. The notification of the Nuclear Emergency Preparedness Coordinator has been removed from Figure 6-1 as immediate notification is not necessary.

Safety Evaluation

In a letter from D. C. Hintz to Document Control Desk dated December 17, 1984 we informed the Commission of our proposed method of upgrading the notification/communication activities during an emergency. By letter from C. J. Paperiello to D. C. Hintz dated January 9, 1985 we were informed that our proposed method is acceptable. The change does not decrease the effectiveness of the plan.

Page 7-1

Description of Change

Added a reference to Figure C-7 to identify location of the Joint Public Information Center (JPIC) and the Emergency Operations Facility (EOF).

Safety Evaluation

Since the change is administrative in nature the change will not decrease the effectiveness of the plan.

Page 7-7

Description of Change

The page was revised to reflect required activation of the JPIC at classification of Alert or higher.

Safety Evaluation

Requiring activation of the facility at a lower classification level provides added preparedness in the event of a rapidly escalating event. The change does not decrease the effectiveness of the plan.

Pages 7-8, 7-9 and 7-10

Description of Change

Several grammatical changes were made.

Safety Evaluation

Since the changes are administrative in nature the change does not decrease the effectiveness of the plan.

Page 7-18

Description of Change

The section was revised to incorporate current procedural methods for environmental radiological monitoring and sampling.

Safety Evaluation

The revised methods described in the revision have been developed based on post exercise critiques and evaluations performed by the appropriate directors and support personnel. Since the revision is considered an upgrade to an existing program, the change will not decrease the effectiveness of the plan.

Pages 8-1, 8-3, 8-9

Description of Change

Minor Grammatical changes were made.

Safety Evaluation

Since the changes are administrative in nature the changes do not decrease the effectiveness of the plan.

Page 8-2

Description of Change

The responsibility to develop, review and upgrade the Emergency Plan has been transferred from the Nuclear Licensing and Systems Superintendent to the Nuclear Emergency Preparedness Coordinator.

Safety Evaluation

The change was made to better reflect current organizational responsibilities. Since the change is administrative in nature, the change does not decrease the effectiveness of the plan.

Page 8-4

Description of Change

To address an NRC recommendation made during the July 9-13, 1984 emergency preparedness inspection, we revised this section to better define the scope of our technical review of the emergency preparedness program in accordance with 10 CFR 50.54(t). The Statement as to when the technical review will be submitted has been removed as it is already defined within our Engineering Control Directives (ECD).

Safety Evaluation

The additional information provided better defines the responsibility of the WPS Nuclear Services Group, therefore the change does not decrease the effectiveness of the plan.

Pages 8-5 through 8-8

Description of Change

These pages have been modified to reflect the "carryover" information due to the revision of page 8-4.

Safety Evaluation

Since the changes are administrative in nature, the changes do not decrease the effectiveness of the plan.

Pages 8-13 and 8-14

Description of Change

To address an NRC open item identified during the July 9-13, 1984 emergency preparedness inspection, this page was revised to add the quarterly unannounced radio pager drill. Minor title changes were incorporated to better define organizational responsibilities.

Safety Evaluation

The additional information provided better defines our organizational responsibilities and our current commitments to emergency preparedness drills, therefore the change does not decrease the effectiveness of the plan.

Page 8-15, 8-16 and 8-17

Description of Change

Section 8.3.2 entitled "Review and Updating Written Agreements" was rewritten to provide the option of establishing perpetual letters of agreement. The sentence detailing responsibility for maintaining the letters of agreement has been deleted from Section 8.3.2 since it is already identified as a responsibility of the Nuclear Emergency Preparedness Coordinator in section 8.3.1.

Pages 8-16 and 8-17 received cosmetic (format) changes.

Safety Evaluation

This action was prompted as a result of a request from the Institute of Nuclear Power Operation (INPO). It would be an unnecessary administrative burden for INPO to reissue on a biennial basis a letter of agreement to each utility in the country reemphasizing their support. A perpetual letter that details the support available has been issued to the utilities and is considered effective until INPO revises the letter.

WPS will continue to review the letters of agreement at least every two years for any necessary changes or updating. If no changes are necessary and the letter of agreement is identified as a perpetual agreement then the letter need not be redated and reissued every two years.

The intent of the letters of agreement is to provide assurance that support will be available if required. This change does not decrease this assurance and therefore it does not decrease the effectiveness of the plan.

Pages 9-1, 9-2, 9-3 and 9-4

Description of Change

The section was rewritten to better define the philosophy and approach to recovery operations. The recovery organization has been better defined including the role of the Manager Nuclear Power, the Emergency Director and the Emergency Response Manager.

Safety Evaluation

The revision provides more detail on the recovery organization's methods and responsibilities. The change does not decrease the effectiveness of the plan.

Pages C-4, C-5, and C-6

Description of Change

Figures C-3 and C-4 were revised to include a reference to the 1980 Census data for determining population distributions.

Figure C-5 was revised to reflect the use of grids on the EPZ field maps.

Safety Evaluations

Since the change is administrative in nature, the change does not decrease the effectiveness of the plan.

Pages D-1 and D-2

Description of Change

The Appendix was updated to reflect updated letters of agreement.

Safety Evaluation

Since the change is administrative in nature, the change does not decrease the effectiveness of the plan.

Page E-1

Description of Change

Added Nuclear Emergency Preparedness Coordinator's office as a location for the State of Wisconsin's response plan.

Safety Evaluation

Since the change is administrative in nature, the change does not decrease the effectiveness of the plan.

Page F-6

Description of Change

Appendix F-V was revised to incorporate the new titles to the State and County response plans and the EPZ grid map.

Safety Evaluation

Since the change is administrative in nature, the change does not decrease the effectiveness of the plan.

Pages G-2 through G-5

Description of Change

These pages were revised to reflect current status of EPIP index.

Safety Evaluation

Since the change is administrative in nature, the change will not decrease the effectiveness of the plan.

Pages H-1 through H-5

Appendix H entitled "Evacuation Time Estimates" has been revised to incorporate the recent changes within the Kewaunee and Manitowoc County Radiological Emergency Response Plans. The time tables in Appendix H have been upgraded to reflect the revised time estimates now included in the county plans.

Safety Evaluation

The revision is necessary to provide consistency between the WPS plan and that of the affected counties. The update incorporates recent analysis and evaluations which were conducted by the counties therefore the change does not decrease the effectiveness of the plan.