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SUBJECT: Forwards safety evaluation & revised pages of Rev 7 to emergency plan. Annual review of plan must be performed & updates to reflect current status of emergency preparedness program provided. Changes not decrease effectiveness of plan.

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February 16, 1987

10 CFR 50, Appendix E

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Emergency Plan Revision 7

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 and the safety evaluation are included as Attachment 1 to this letter. A copy of the revised pages are included as Attachment 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.

Pursuant to 10 CFR 50.4 two additional copies of this letter and attachments are hereby submitted to Mr. James G. Keppler, Regional Administrator, U. S. Nuclear Regulatory Commission, Region III, Glen Ellyn, Illinois. As required, one copy of this letter and attachments is also submitted to the Kewaunee Nuclear Power Plant NRC Resident Inspector.

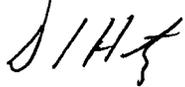
Please remove and discard the affected pages and insert the revised pages as instructed on the "KNPP Emergency Plan Revision Instruction Sheet" (Attachment 2). Please sign and return the revision certification block on the last page of the revision instruction sheet to assure us that you have received your copy.

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Document Control Desk
February 16, 1987
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Sincerely,



D. C. Hintz
Vice President - Nuclear Power

DSN/jms

Attachment

cc - US NRC, Region III (2 copies)
Mr. Robert Nelson, US NRC, (1 copy)
Mr. R. S. Cullen, PSCW - w/o attachment

Attachment 1

WPS Safety Evaluation
of the Kewaunee Nuclear Power Plant
Emergency Plan
(Rev. 7)

WPS Safety Evaluation
of the Kewaunee Nuclear Power Plant
Emergency Plan

Record of Revision and Index Pages

Description of Change

Add revision 7 to the table of revisions.

Safety Evaluation

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

Page vii

Description of Change

Changed the title of Table 4-1 from "Summary of Emergency Action Levels" to "Emergency Classification." Changed the page number reference for Table 4-2.

Safety Evaluation

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

Page ix

Description of Change

Change name and title of the policy statement approver.

Safety Evaluation

This is a corporate organizational change which does not decrease the effectiveness of the plan.

Page 1-3Description of Change

Changed the title of Manager-Nuclear Power to Vice President-Nuclear Power.

Safety Evaluation

This is a corporate organizational change which does not decrease the effectiveness of the plan.

General Statement of Pages 4-11 thru 4-30✓ 1. Description of Change

The order in which the four emergency classification levels are listed has been reversed. When the chart is read from top to bottom the most severe level (General Emergency) and its criteria and indications are listed first. The least severe level (Unusual Event) and its criteria and indications are listed last. This change complies with an NRC recommendation made during the 1985 emergency preparedness inspection.

Safety Evaluation

This format change enhances classification of emergencies since an individual reviewing the charts will normally review the most severe criteria first by reading the chart from top to bottom. The philosophy of declaring the highest level of emergency for a given situation is maintained. This change does not decrease the effectiveness of the plan.

2. Description of Change

Because of this format change and other minor format changes page numbers 4-13 thru 4-34 were renumbered as was necessary.

Safety Evaluation

Since this change was administrative in nature it does not decrease the effectiveness of the plan.

Page 4-12

✓ Description of Change

The criteria for the "Abnormal Radiological Effluent" chart were changed to show a more direct link to Technical Specifications. The "KNPP Indication" has been modified to provide the user with more specific Technical Specification references and information.

Safety Evaluation

Since these changes provide clearer and more specific reference to Technical Specifications, these changes do not decrease the effectiveness of the plan.

Page 4-12A

✓ Description of Change

In the section on "Auxiliary Building Vent Release" under R-13 the value $2.5E+4$ cpm, for alert, has been replaced by an "*" which is footnoted as a confirmation of an off-scale high reading.

Safety Evaluation

The "Alert" setpoint for the "Auxiliary Building Vent Release" path (R-13) was recalculated based on Radiological Effluent Technical Specifications. The corrected value exceeds the R-13 instrument range of 1×10^6 cpm, therefore a meter reading off-scale is the appropriate "alert" indication value. Since the change is intended to correct the value and provide compliance with NUREG-0654 guidance, this change does not decrease the effectiveness of the plan.

Page 4-13Description of Change

Changed the units "cpm" from upper case to lower case.

Safety Evaluation

This change is a grammatical correction which does not decrease the effectiveness of the plan.

Page 4-13ADescription of Change

A clearer and more specific description of the KNPP indication is provided and a more specific definition for activity is provided. A note informing the user that \bar{E} is the average sum of beta and gamma energies and a reference to Technical Specification is also provided.

Safety Evaluation

Since this change provides clearer definition and more specific reference to Technical Specification, this change does not decrease the effectiveness of the plan.

Page 4-15Description of Change

The phrase "of the alarm" was added to both alert classification indications for rapid failure of steam generator tubes with loss of offsite power. For a rapid failure of one steam generator tube criterion, a primary to secondary leak rate of >400 gpm was added. For the Unusual Event classification a simple reference to Technical Specification TS 3.1.d.2 has been expanded to show the wording of TS 3.1.d.2.

Safety Evaluation

These changes expand or add to the existing indications provided for the user. Therefore, these changes do not decrease the effectiveness of the plan.

Page 4-17Description of Change

For Unusual Event caused by loss of engineered safety features, the indication has been expanded to show the safety features that should be checked by the user.

Safety Evaluation

Since this change provides a more specific list of indications, this change does not decrease the effectiveness of the plan.

Page 4-24Description of Change

The phrase "shutdown panel" was removed and replaced with "Dedicated Shutdown and Local Panels." The word "significant" was inserted for the indication of pipe cracking as an example of Unusual Event.

Safety Evaluation

Clarification of the terminology for the "Dedicated Shutdown and Local Panel" provide the proper designation and therefore does not decrease the effectiveness of the plan.

The addition of the word "significant" in reference to pipe cracking was added to provide better guidance to the operator. It is not intended that "any" identified pipe cracking be cause to declare an emergency level. But significant cracking, as viewed by a reactor or senior reactor operator, which causes concern for the safe operation of the plant is. This clarification does not decrease the effectiveness of the plan.

Page 4-26Description of Change

Removed the terms "Safe Shutdown Earthquake," "Event," "Lo" and "Hi" and replaced them with "Design Basis Earthquake," "Trigger," "OBE" and "DBE" respectively.

The reference to 0.12g and 0.06 g horizontal ground acceleration values as a KNPP indication were removed.

Safety Evaluation

The changing of these terms more accurately reflects the terminology used in Technical Specifications and the removal of the old system and installation of the new seismic instrumentation. This change does not decrease the effectiveness of the plan.

Removal of the horizontal ground acceleration values was based on the fact that the University of Wisconsin Milwaukee Seismic Center cannot verify an exact value from their remote location within an acceptable timeframe. They can, however, verify the occurrence of a seismic event in the KNPP area. This change does not decrease the effectiveness of the plan.

Page 4-27

Description of Change

The lake level for an Unusual Event classification was changed from 584' to 586' and the lake level for a high water Alert was changed from 586' to 588'. Painted markings on the forebay wall were added for determining classification level by direct observation.

Safety Evaluation

Based on Appendix 1 to NUREG-0654, the previous level of 584' for Unusual Event is based on the highest recorded 50 year flood level. The Alert level is to be based on a level near design level. The KNPP structure is designed to 590', therefore establishing an Alert level of 588' provides sufficient margin to the 590' design level. The current Lake Michigan levels are at an all time high, therefore, the KNPP would continuously be in an Unusual Event level since these levels exceed the 50 year flood

level. Since KNPP is designed for lake levels well above the 50 year flood level, use of this arbitrary limit is not justified. Declaring an Unusual Event at a level equal to 586' indicates very unusual lake conditions and provides an early indication of an approach to the design limit. Since the new limits are based on design limits and not arbitrary historical lake levels, the level limits are more specific to the KNPP. This change, therefore, does not decrease the effectiveness of the plan.

Page 4-31 & 32

Description of Change

Changed page number from 4-33 and 4-34 to 4-31 and 4-32 respectively.

Safety Evaluation

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

Page 5-1 & 2

Description of Change

Change the number of Plant Manager support groups at the plant from five (5) to six (6).

Safety Evaluation

Because of plant organizational changes the former Technical and Services Group was split into two separate groups with a department head named for each. Since the support functions remain the same and only reorganized, this change does not decrease the effectiveness of the plan.

Page 5-5

Description of Change

The identification of who will be designated as Emergency Response Manager was changed from an individual, the Manager - Nuclear Power, to the statement "a designated member of the corporate management staff" with a reference to the appropriate table.

Safety Evaluation

Since the table referenced shows the primary designee and alternates by title the effectiveness of the plan is not decreased.

Page 5-28

Description of Change

For the Emergency Director position, changed the normal title of Assistant Manager - Plant Technical and Services to Assistant Manager - Plant Services. For the Technical Support Center Director position, changed the normal title of Plant Technical Supervisor to Superintendent - Plant Technical. For the Radiological Protection Director position, changed the normal title of Assistant Manager - Plant Technical and Services to Assistant Manager - Plant Services. For the Security Director position, changed the normal title of QC Records Coordinator to Plant Records Coordinator and the normal title of Plant Office Supervisor to Plant Office Coordinator.

Safety Evaluation

These changes are either company organizational changes or corrections of typographical errors and therefore do not decrease the effectiveness of the plan.

Page 5-29Description of Change

For the Emergency Response Manager position, changed the normal title of Manager - Nuclear Power to the Assistant Manager - Nuclear Engineering. Also swapped the order of the second and third alternate for the Emergency Response Manager.

Safety Evaluation

These changes reflect company organizational changes which do not decrease the effectiveness of the plan.

Pages 5-30 & 33Description of Change

Corrected the block diagrams to reflect corporate and plant organizational changes.

Safety Evaluation

This is an administrative change that does not decrease the effectiveness of the plan.

Page 6-20Description of Change

Removed reference to emergency vehicle.

Safety Evaluation

The plant vehicle which was specifically designated for the transport of injured personnel to medical facilities was removed from service in that capacity. Vehicles are maintained on site which would be available to transport personnel with minor injuries. The transport of seriously injured personnel is provided for by letters of agreement with local ambulance companies. This change provides better medical care for plant personnel who may become seriously injured while on-site. This change does not decrease the effectiveness of the plan.

Page 6-24Description of Change

The brackets around pending plan revisions were removed.

Safety Evaluation

The bracketed information was intended to make the reader aware of future capabilities of the public notification system. Since these changes are complete, the information can be completely incorporated into the plan. This change does not decrease the effectiveness of the plan.

Page 7-10Description of Change

Change the number of independent trunk lines from four (4) to seven (7).

Safety Evaluation

Since the number of independent telephone lines are being increased, this change does not decrease the effectiveness of the plan.

Page 8-1Description of Change

Change title from Manager - Nuclear Power to Vice President - Nuclear Power.

Safety Evaluation

This change is administrative in nature and does not decrease the effectiveness of the plan.

Page 8-2Description of Change

Changed title from Manager - Nuclear Power to Assistant Manager-Nuclear Engineering.

Safety Evaluation

This change is administrative in nature and does not decrease the effectiveness of the plan.

Page 8-3Description of Change

Changed the following titles:

- Plant Technical Supervisor to Superintendent Plant Technical.
- Assistant Manager - Plant Technical and Services to Superintendent - Plant Technical and Assistant Manager - Plant Services.
- Manager - Nuclear Power to Vice President - Nuclear Power.

Switched the individual to which the Superintendent - Plant Technical reports to from the Assistant Manager - Plant Technical and Services to the Plant Manager.

Safety Evaluation

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

Page 8-4

Description of Change

Changed the reference from the QAD 3.2 to the "Operational Quality Assurance Program, at least every 24 months." Change the title Manager - Nuclear Power to Vice President - Nuclear Power. Change the group name Nuclear Services Group to Nuclear Technical Review Group.

Safety Evaluation

Replacing the QAD reference with the program reference more accurately describes the governing document which will ensure that the audit is performed. This reference change does not decrease the effectiveness of the plan. The title change and group name change are administrative in nature and do not decrease the effectiveness of the plan.

Pages 8-6 & 7

Description of Change

Indoctrination training was replaced with General Employee Training - Radiation Protection.

Safety Evaluation

Section 8.2.1.(4) was rewritten to more accurately describe the training provided to individuals who have security badge access but do not have an assigned emergency response duty. The specified emergency preparedness topics are now covered within the General Employee Training - Radiation Protection program. The topics covered have been modified to more accurately reflect that which is actually presented in these training sessions. Topics that were deleted from this plan are either covered in other sections of the General Employee Training - Radiation Protection program or determined not to be necessary. These changes do not decrease the effectiveness of the plan.

Page 8-9

Description of Change

Corrected a typographical error.

Safety Evaluation

This change is administrative in nature and does not decrease the effectiveness of the plan.

Page 8-10

Description of Change

Change the title Manager - Nuclear Power to Vice President-Nuclear Power.

Safety Evaluation

This change is administrative in nature and does not decrease the effectiveness of the plan.

Page 8-14Description of Change

Corrected a typographical error. Change the title Plant Technical Supervisor to Superintendent - Plant Technical and the title Manager - Nuclear Power to Vice President - Nuclear Power. Added the reference to ECD 5.13, "Review and Control of Emergency Plan".

Safety Evaluation

The typographical error and title changes are administrative in nature and do not decrease the effectiveness of the plan. The addition of the ECD as a reference gives better definition to the methods used to ensure a safety evaluation is completed with each Emergency Plan review. This change does not decrease the effectiveness of the plan.

Pages 9-1 & 4Description of Change

Changed the title Manager - Nuclear Power to Vice President - Nuclear Power.

Safety Evaluation

This change is administrative in nature and does not decrease the effectiveness of the plan.

Pages A-2 & 3Description of Change

Changed the title Vice President - Power Production to Vice President - Nuclear Power.

Safety Evaluation

This change is administrative in nature and does not decrease the effectiveness of the plan.

Pages D-1 & 2Description of Change

Change the "Date Written" dates for several letters of agreement.

Safety Evaluation

Since this date change signifies a reaffirming of the letters of agreement these changes do not decrease the effectiveness of the plan.

Page G-3 thru 5Description of Change

Removed a section reference from previously deleted procedure EP-RET-3E.

Removed "(KNPP Meteorological Data)" from procedure EP-ENV-3E.

Deleted procedure EP-ENV-3F and its section reference.

Added procedure EP-ENV-4D and its section reference.

Deleted procedure EP-TSC-6 and its section reference.

Added procedures EP-TSC-9A, 9B, 9C and their section reference.

Safety Evaluation

Removing the section reference from procedure EP-RET-3E corrects a typographical error and does not decrease the effectiveness of the plan.

Removing the reference to KNPP meteorological data and deleting procedure

EP-ENV-3F reflects a PORC approved procedure change which combines procedure EP-ENV-3F with EP-ENV-3E so that X/Q can be manually calculated using either KNPP or Point Beach meteorological data. Procedure EP-ENV-4D was added to provide better direction to field teams assigned plume tracking responsibilities. Procedure EP-TSC-6 was deleted and replaced with EP-TSC-9A, 9B and 9C through PORC approval to provide a more accurate method of determining core damage. These changes do not decrease the effectiveness of the plan.

Page I-7

Description of Change

Changed plan section number from 8.3.2 to 8.3.1.

Safety Evaluation

This change corrects a typographical error and does not decrease the effectiveness of the plan.