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 AUTH. NAME AUTHOR AFFILIATION
 HINTZ, D. C. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Requests approval to relocate emergency operations
 facility, per Suppl 1 to NUREG-0737, Section 8.4.1.b (Table
 1). Fee paid.

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

June 3, 1987

10 CFR 50.54(q)

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Request Approval to Relocate the Kewaunee Nuclear Power Plant Emergency
Operations Facility (EOF) from Two Rivers, Wisconsin to Green Bay, Wisconsin

Pursuant to 10 CFR 50.54(q) and Appendix E, Paragraph IV.E, "Requirement for Emergency Facilities and Equipment for Operating Reactors," and as part of the Wisconsin Public Service Corporation's (WPSC) goal to continue improving in all areas of our operation, we are requesting approval to relocate our Emergency Operations Facility (EOF). The proposed location for the new near site EOF will be within the Nuclear Department's normal office area of the WPSC office complex in Green Bay, Wisconsin. NUREG-0737 Supplement 1, section 8.4.1.b (Table 1), states that Commission approval is needed to establish a near site EOF at a distance greater than 20 miles from the Technical Support Center (TSC). This relocation would place the near site EOF 26.5 miles from the Kewaunee Nuclear Power Plant (KNPP) site.

This proposal has been formally discussed with our former NRC Project Manager, Mr. Mort Fairtile during a meeting on March 12, 1987. In turn, he has discussed the proposal with NRC Headquarters and Region III Personnel. Mr. Fairtile informed us during his visit that both groups see definite advantages to such a move and would be receptive to our proposal and request. This proposal has also been discussed with Mr. Ted Quay the present NRC Project Manager for KNPP.

The proposed schedule for completion of this project is as follows:

- a. Obtain NRC approval in 1987.
- b. Initiate the necessary construction and telephone circuit installation orders as soon as approval is received.

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- c. After the 1987 exercise, move the facility when communications circuits are installed and tested.
- d. Conduct the 1988 emergency exercise (small-scale) in the new near site EOF.

Table 1 in NUREG-0737 Supplement 1 stipulates that if the near site EOF is greater than 20 miles from the TSC that provisions must include a location for NRC staff closer to the plant site. Since 1981, when NUREG-0737 Supplement 1 was published, experience in exercises has shown that the NRC staff responding to a particular site will want to be either on site (Technical Support Center or Control Room) or at the EOF. It is our belief that we can provide for the NRC's Site Response Team adequately at both the site and the EOF. Therefore, an additional location for the NRC, near the site, is not necessary. Assuming this, we do not intend to maintain a facility for NRC staff at a location closer to the plant. By attachment to this letter we provide the reasons why a relocation of the Kewaunee Nuclear Power Plant EOF to Green Bay would allow us to improve our ability, as well as the NRC's ability, to respond to a plant emergency.

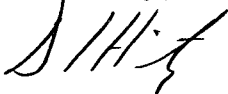
Summary

The proposed relocation of the Kewaunee Nuclear Power Plant EOF will provide an enhanced emergency response capability. All features, functions and facilities will be equivalent to or better than those at the existing facility. The slight increase in distance from the plant site poses no obstacle to timely activation of the facility. In fact the EOF relocation will enable more prompt activation of the facility since most of the personnel assigned to the facility work and live in the Green Bay area.

As required by NUREG-0737 Supplement 1, Section 8.4.1.b (Table 1) we are requesting approval to implement the EOF relocation.

We look forward to implementing this improvement. My staff will be available to answer questions or provide clarification if necessary.

Sincerely,



D. C. Hintz
Vice President - Nuclear Power

DRS/cmg

Attach.

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

Attachment to Letter
from D. C. Hintz to Document Control Desk
dated June 3, 1987

- Attachment A - Reasons for relocating the KNPP EOF
- Attachment B - Area Map
- Attachment C - Summary of Communications Systems
- Attachment D - EOF Communications by Work Station
- Attachment E - Work Station Figures
- Attachment F - State of Wisconsin Letter
- Attachment G - Kewaunee County Letter
- Attachment H - Manitowoc County Letter

Reasons for relocating the Kewaunee Nuclear Power Plant EOF.

Activation Time

When discussing activation time for an emergency response facility, consideration must not only be given to travel time but also to the time needed to set up the facility so that it is functional. Although the distance from the plant site to the new EOF is 12 miles further than the present EOF it is closer to the support resources of our company in Green Bay. (See attachment B)

- During normal working hours corporate personnel would be available to immediately start the EOF activation process. It is estimated that the new EOF could be activated within 5-10 minutes.
- During non-work hours the travel time for approximately 80% of the personnel assigned to the new EOF would be less than 20 minutes. This is compared with a minimum 45 minute travel time to the present EOF location.
- Since the new EOF would be a transformation of the normal working environment, minimal additional time would be needed for familiarization with facility equipment, communications systems or informational resources.

Communications

Communication capabilities are essential in emergency response. Response organizations should take every opportunity to improve their communications capabilities whenever major technological advances are made.

- There is now a fiber optic transmission link between the City of Kewaunee and Green Bay that is not available between the City of Kewaunee and Two Rivers (the current location of our EOF). The plant site and the new EOF can take advantage of this link to obtain higher quality and more dependable voice and data transmission.

- With the new EOF in our Green Bay offices we can take advantage of the Dimension 2000 telephone system that is now available. This system provides greater flexibility and potential for expansion than the systems available at the present EOF.
- The telephone system available to the proposed EOF is equipped with a battery power backup unit which will allow the system to function during power failures.
- The new EOF will be designed to provide improved communication capabilities in each work area. (See attachment C and D)
- Wisconsin Bell telephone company services the Green Bay area and is a company with which we maintain a letter of agreement as part of our emergency plan. The entire range of Bell Systems capabilities would be available to us. A faster response time for emergency repair and system expansion would be realized.
- In an October 24, 1986 letter from Mr. D. C. Hintz (WPSC) to Mr. J A Hind (US-NRC) we committed to providing a boom truck with high reach capabilities for a NRC radio backup system. We will maintain that commitment.
- At present, communications with field teams are via radio. The present EOF has a remote transmitter which would be transferred to the proposed EOF. Therefore, direct coordination of environmental monitoring field teams would continue to be performed from the proposed EOF.

Data Transfer

The Honeywell terminal and printer which are connected to the Kewaunee Nuclear Power Plant's process computer would be moved to the proposed Green Bay EOF. This system provides the EOF with a wide range of plant parameters including primary and secondary systems, radiological monitors and site meteorological data. The system also allows for trending of selected parameters. Having access to the Plant's process computer in our normal work space will allow management and engineering staff to follow plant operation prior to the declaration of an emergency, as well as monitor the progress of the event.

Dose Projection and Environmental Monitoring

Dose projection and environmental monitoring coordination activities are conducted at the present EOF and would also be conducted from the proposed EOF.

- The function of dose projection and field team coordination is initially implemented by the Radiological Protection Director (RPD) at the plant site until relieved of this responsibility by an Environmental Protection Director (EPD) at the EOF. By locating the new EOF in our corporate office, the activation time for the EPD would be reduced. This would allow the RPD to be relieved more promptly and permit that person to concentrate on in-plant radiological situations.

Records Availability and Management

All records maintained at the present EOF would also be available at the proposed EOF. In fact the records and management support would be greatly enhanced, because we would have increased access to nuclear records management systems normally maintained in the Green Bay Corporate Office.

Security

Security at the WPS Green Bay complex is maintained by providing only 2 public access passageways to the three buildings. Increased security for the proposed EOF would be provided by a security agency based in Green Bay. The agency can provide quick response on a 24 hour a day basis.

Habitability and Size (See attachment E)

The WPS Green Bay corporate office complex conforms to standard construction codes for office activity occupancy. Emergency power is supplied by a 50KW natural gas generator.

- The nuclear department normal office floor space totals 9600 square feet.
- During a declared emergency at the Kewaunee Nuclear Power Plant 1058 square feet of the nuclear department's normal office floor space would be dedicated to the emergency response.
- 210 square feet adjacent to the nuclear department would be allocated to State and local officials assigned to the EOF.
- The NRC would be allocated 225 square feet for support personnel which could be expanded to 1809 square feet if required.

Listed below is the floor space allocation by work area comparing the present EOF with the new near site EOF.

Work Area	Present EOF (sq. ft.)	New Near Site EOF (sq. ft)
Coordination Center	500	620
ERM Conference	146	210
Dose Calculation/Team Dispatch	64	192
*State/County	64	210
NRC	229	225 (expandable to 1809)

* Not within the nuclear departments normal office space but adjacent to it.

State and County Emergency Government Support

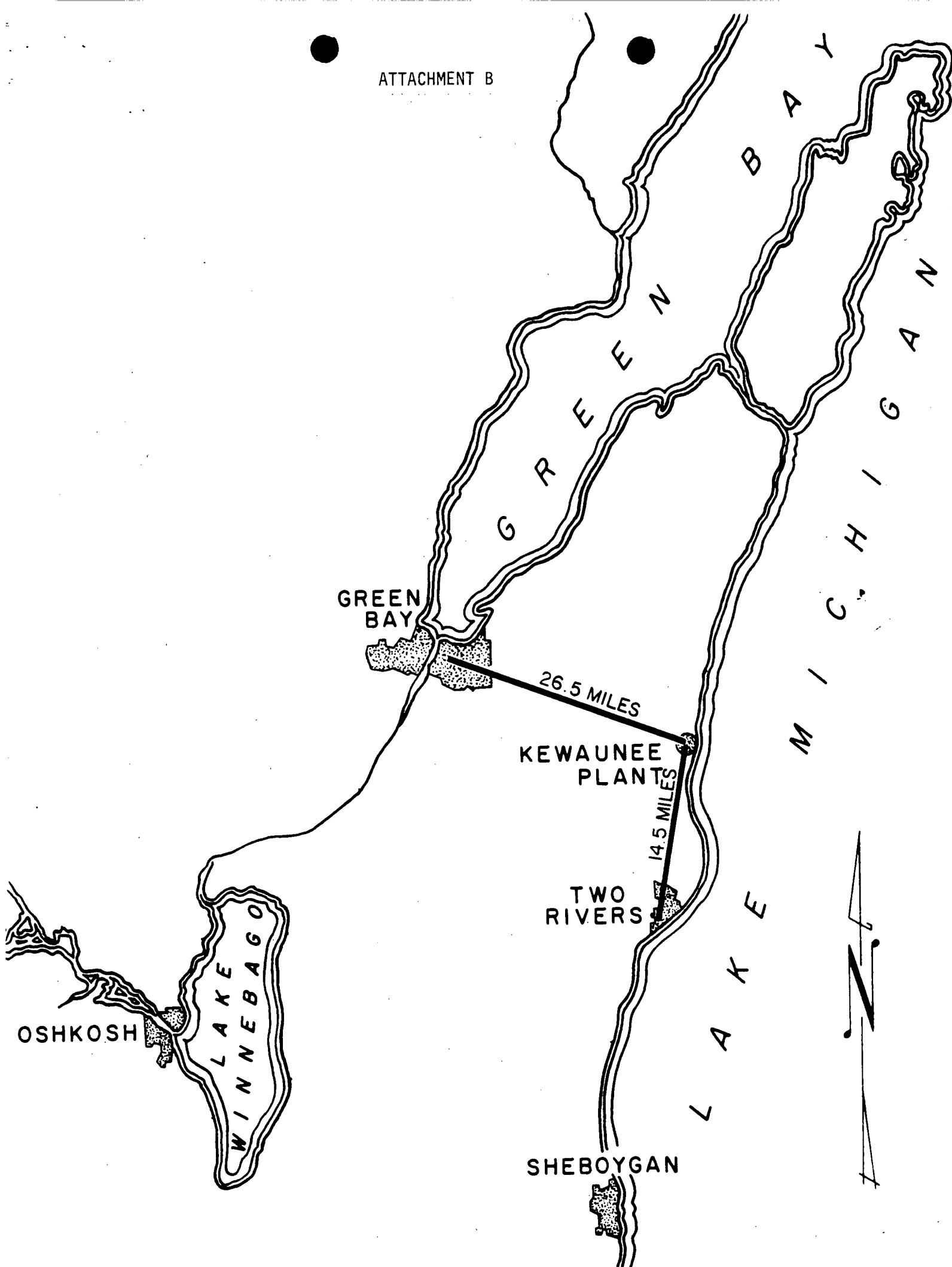
The ramifications of moving the present EOF to Green Bay have been discussed with both state and county officials. They are in general agreement that a new EOF in Green Bay would increase our ability to respond to their needs.

(See attachments F, G & H)

Community Resources

In general, the City of Green Bay has more immediately available resources to support a near site EOF than does the City of Two Rivers. The airport is only 15 minutes from the proposed EOF site with several car rental agencies available. The Green Bay airport is a Terminal Radar Service Area providing 24 hour per day accessibility. There are 3 major hotels within 2 blocks of the proposed EOF site, ample city parking is available and food service capabilities are unlimited.

ATTACHMENT B



ATTACHMENT C

Summary of EOF Communications Systems

Work Area	Present EOF	Proposed New Near Site EOF*
Coordination Center	a) KNPP-PBX, 6 lines b) WPS Two Rivers Building PBX, 1 line c) WPS Green Bay Dimension System 1 line d) Two Rivers Commercial (GTE) 6 lines e) Dial-Select System to both county emergency governments f) NAWAS g) ENS h) Honeywell to plant process computer i) Ring-down to JPIC, 1 line TOTAL: 18 telephone circuits	a) WPS Green Bay Dimension System, 14 lines b) Green Bay commercial (Wisconsin Bell), 4 lines c) Dial-Select System to both county emergency governments d) NAWAS e) ENS f) Honeywell terminal to plant process computer TOTAL: 21 telephone circuits
ERM Conference Room	KNPP-PBX, 1 line	WPS Green Bay Dimension System, 1 line
Dose Calculations/ Environmental Team Dispatch	a) Remote Radio transmitter b) WPS Two Rivers Building - PBX, 1 line c) Two Rivers Commercial, 1 line TOTAL: 2 telephone circuits	a) Remote Radio transmitter b) WPS Green Bay Dimension System, 3 lines c) Green Bay Commercial, 1 line TOTAL: 5 telephone circuits
NRC	a) Two Rivers Commercial, 3 lines b) ENS c) HPN TOTAL: 5 telephone lines	<u>NRC Work Area</u> a) WPS Green Bay Dimension System, 3 lines b) Green Bay Commercial, 1 line c) ENS d) HPN <u>Expanded NRC Work Area</u> a) WPS Green Bay Dimension System, 5 lines b) Green Bay Commercial, 1 line TOTAL: 12 telephone lines
State/County Note: Present State and County procedures show only one State representative coming to the EOF.	Two Rivers Commercial, 1 line TOTAL: 1 telephone line	a) WPS Green Bay Dimension System, 1 line b) Green Bay Commercial, 1 line TOTAL: 2 telephone lines

* See attachments D and E for more precise distributions.

ATTACHMENT D

EOF Communications By Work Station
(See attachment E for specific placement)

WPS Coordination Center1 ERM

- a. GB-DIM XXX1
- b. GOV. Verification (GB-DIM XXX2)
- c. JPIC (Branch of GB-DIM XXX3)
- d. GB-Commercial Line XXXA

1a ERM

Dial-Select (to both County EOCs and the plant)

2 JPIC Communicator

GB-DIM XXX3

3 ALD

GB-DIM XXX4

4 ALD

GB - Commercial XXXC

5,6 & 7 Off-Site Communicator

5a GB-DIM XX09 (Compiler Communication Network)

- a. GB-DIM XXX5
- b. GB-DIM XXX6
- c. GB-DIM XXX7
- d. GB-DIM XXX8
- e. Gov. Verification (GB-DIM XX10, call forwarded from plant to EOF)

8 NAWAS9 Dial-Select10 ENS11 EPD

- a. GB-DIM XX11
- b. GB-Commercial XXXD
- c. Branch of SCRL

12 EPD Communicator

- a. GB-DIM XX12
- b. GB-DIM XX13
- c. GB-Commercial XXXE

WPS Coordination Center (con't)

13 SRCL

GB-DIM XX14 (call forwarded from plant to EOF)

14 ERM Conference Room

GB-DIM XX15 w/speaker

Dose Calculation/EM-Team Dispatch15 Radio Transmitter16 EM-Team Coordinator

- a. GB-DIM XX16
- b. GB-Commercial XXXF

17 Assistant EPD

GB-DIM XX17

18 GB-DIM XX18

D2-6 NRC Work Space

19 GB-DIM XX19 w/speaker

23 ENS

20 GB-Commercial XXXG

24 HPN

21 GB-DIM XX20

22 GB-DIM XX21

D2-5 State/County Work Space

25 GB-DIM XX22

26 GB-Commercial XXXH

G1-5 & 6 NRC Work Space

27 GB-DIM XX23

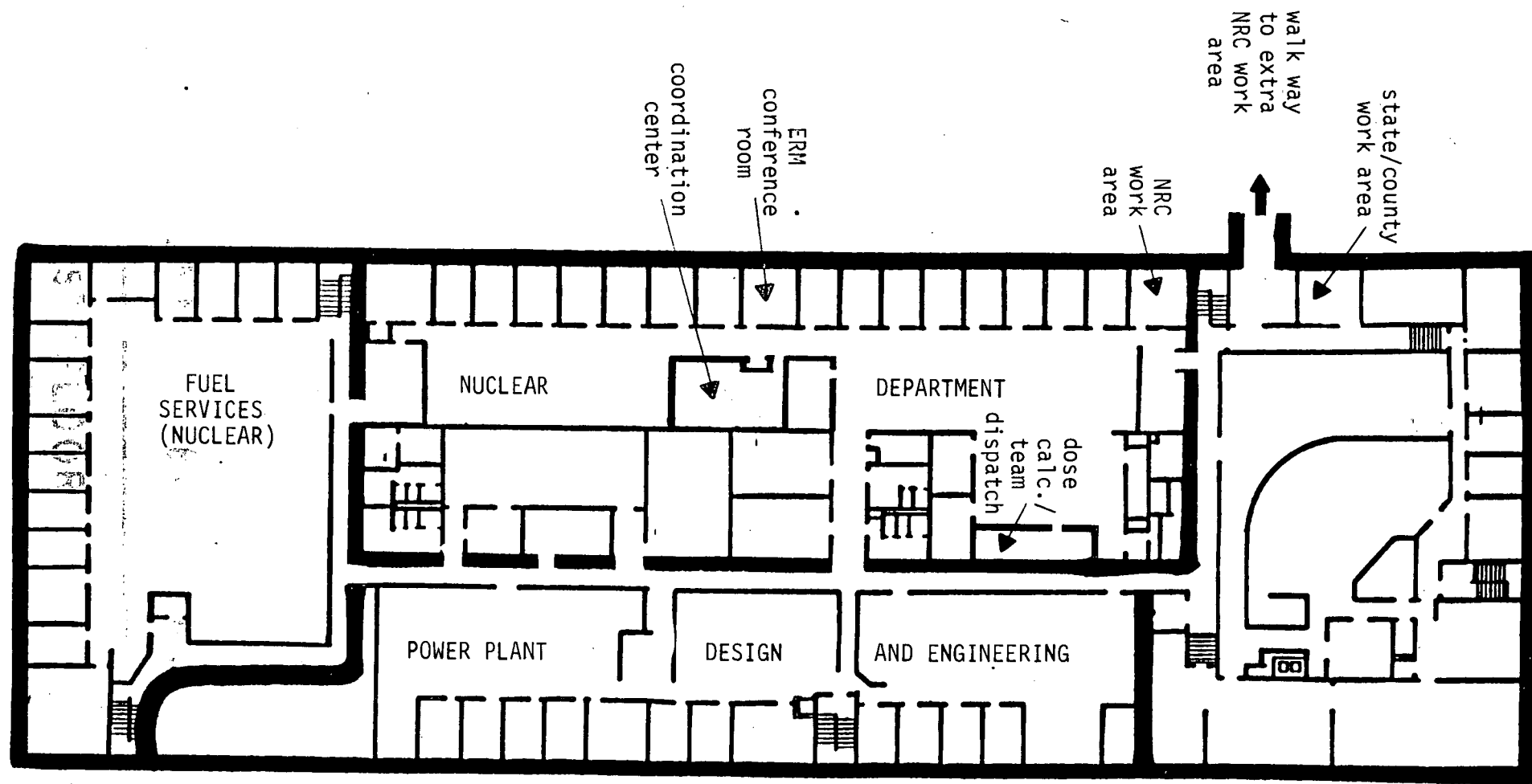
28 GB-DIM XX24

29 GB-DIM XX25

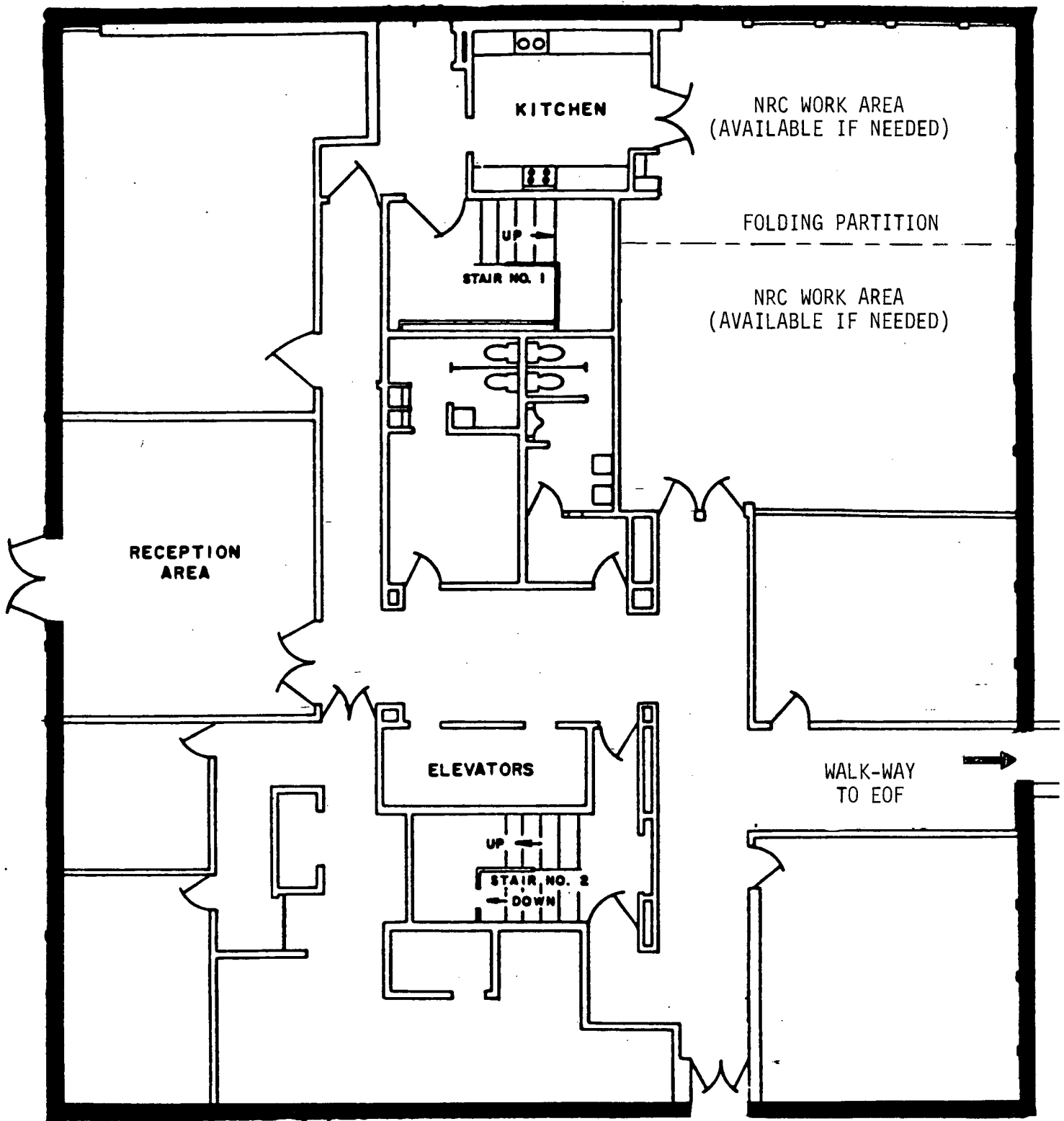
30 GB-DIM XX26

31 GB-DIM XX27

32 GB-Commercial XXXI

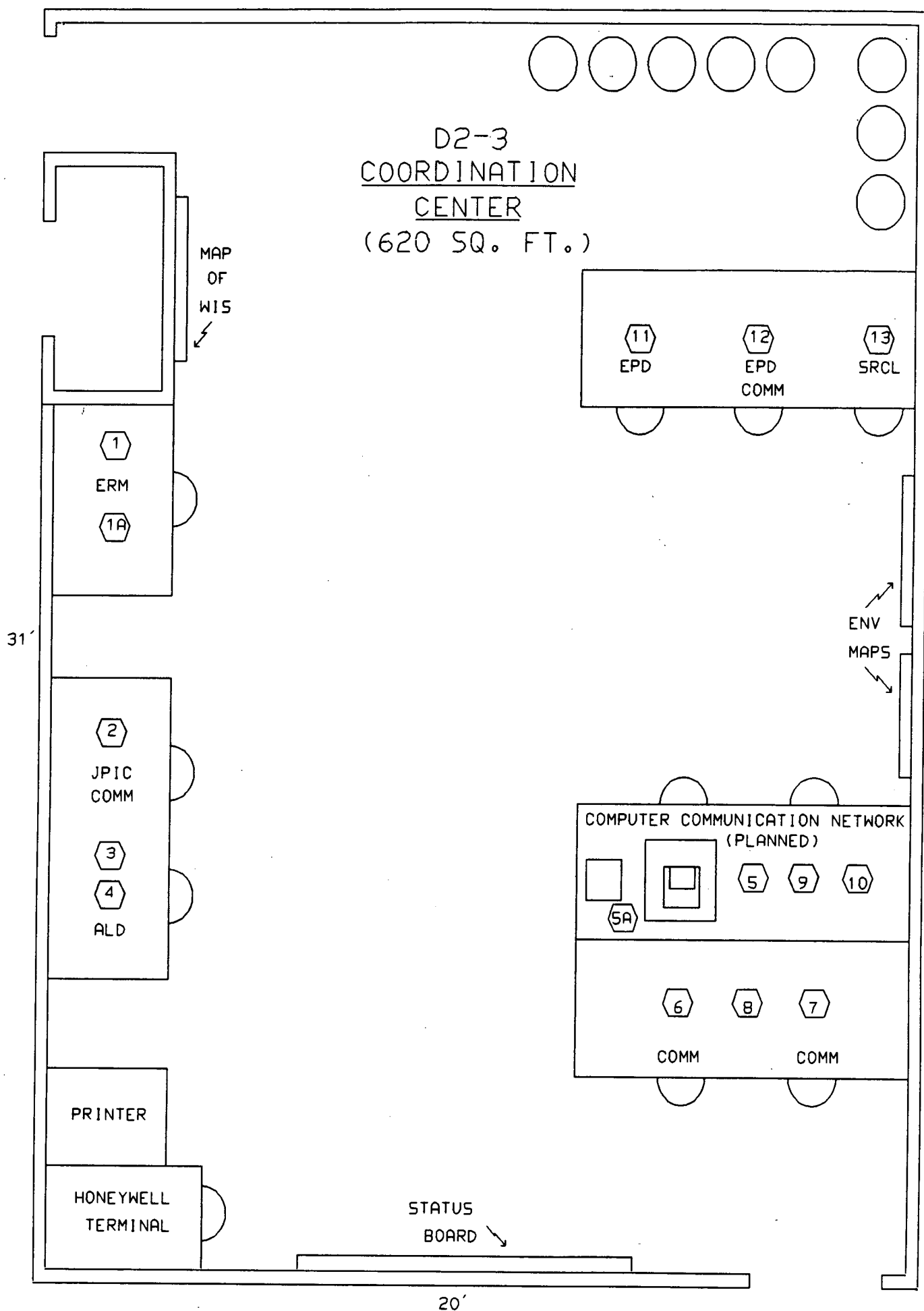


DIVISION OFFICE BUILDING
SECOND FLOOR



GENERAL OFFICE BUILDING

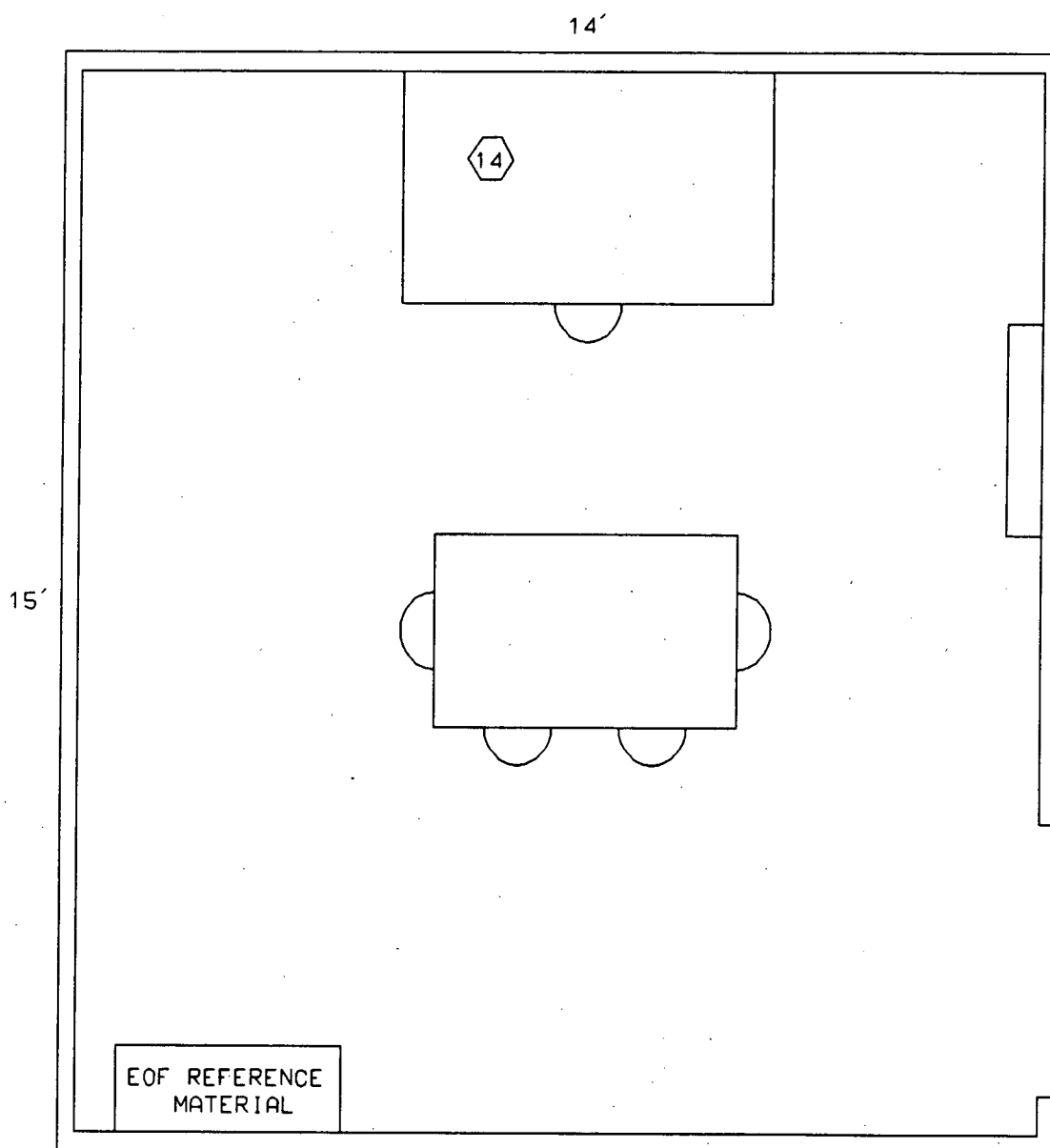
FIRST FLOOR



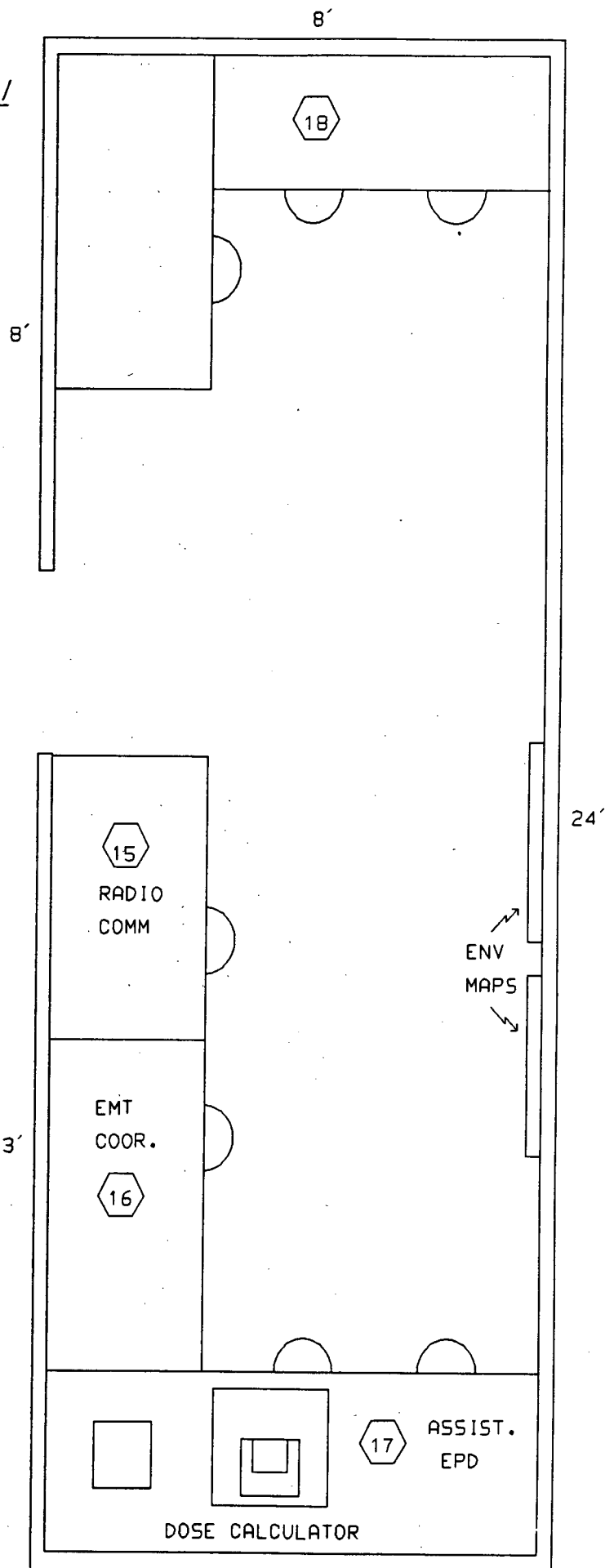
OFFICE - (ASSISTANT MANAGER - NUC. ENG.)

ERM CONFERENCE ROOM

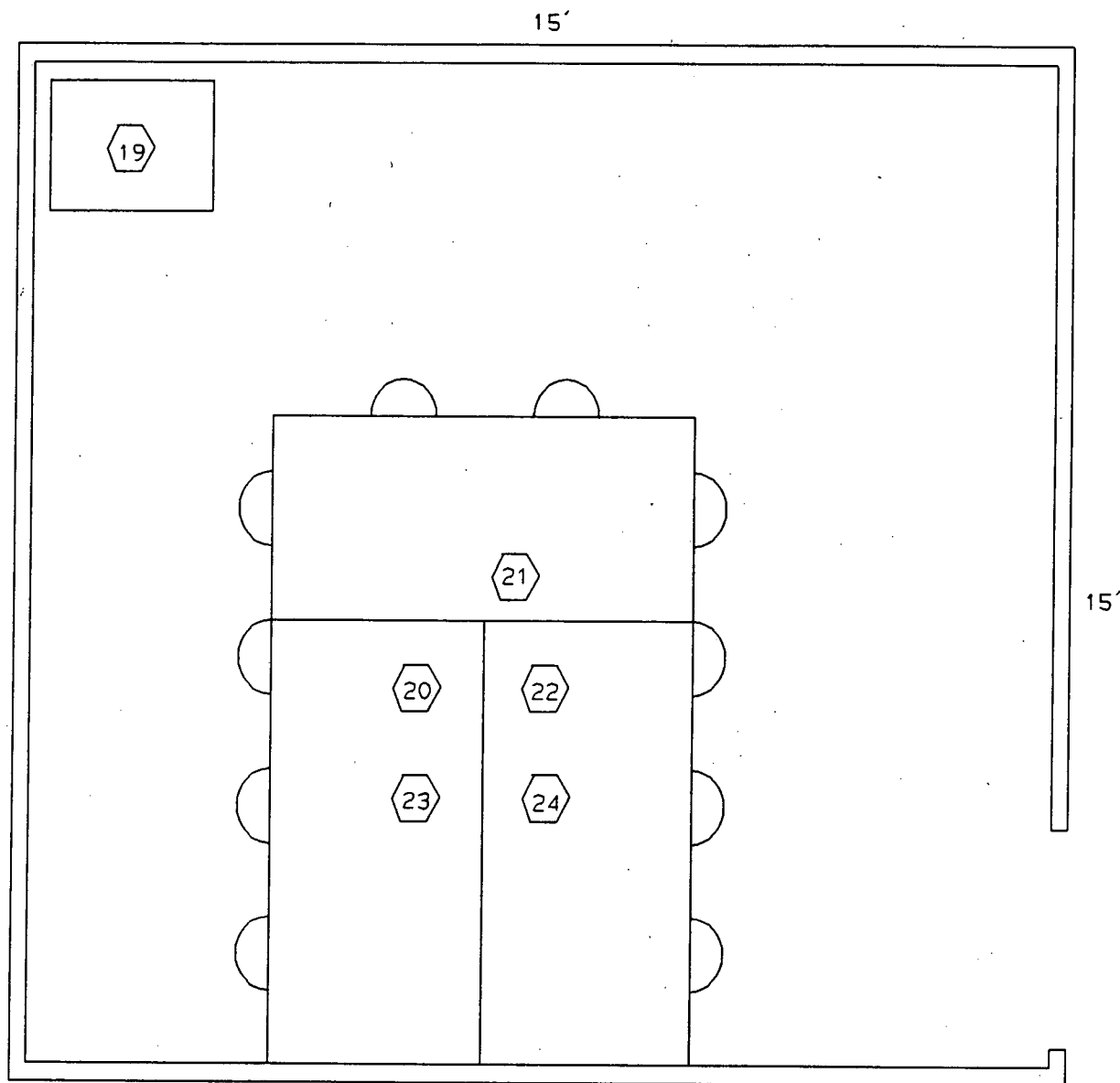
(210 SQ. FT.)



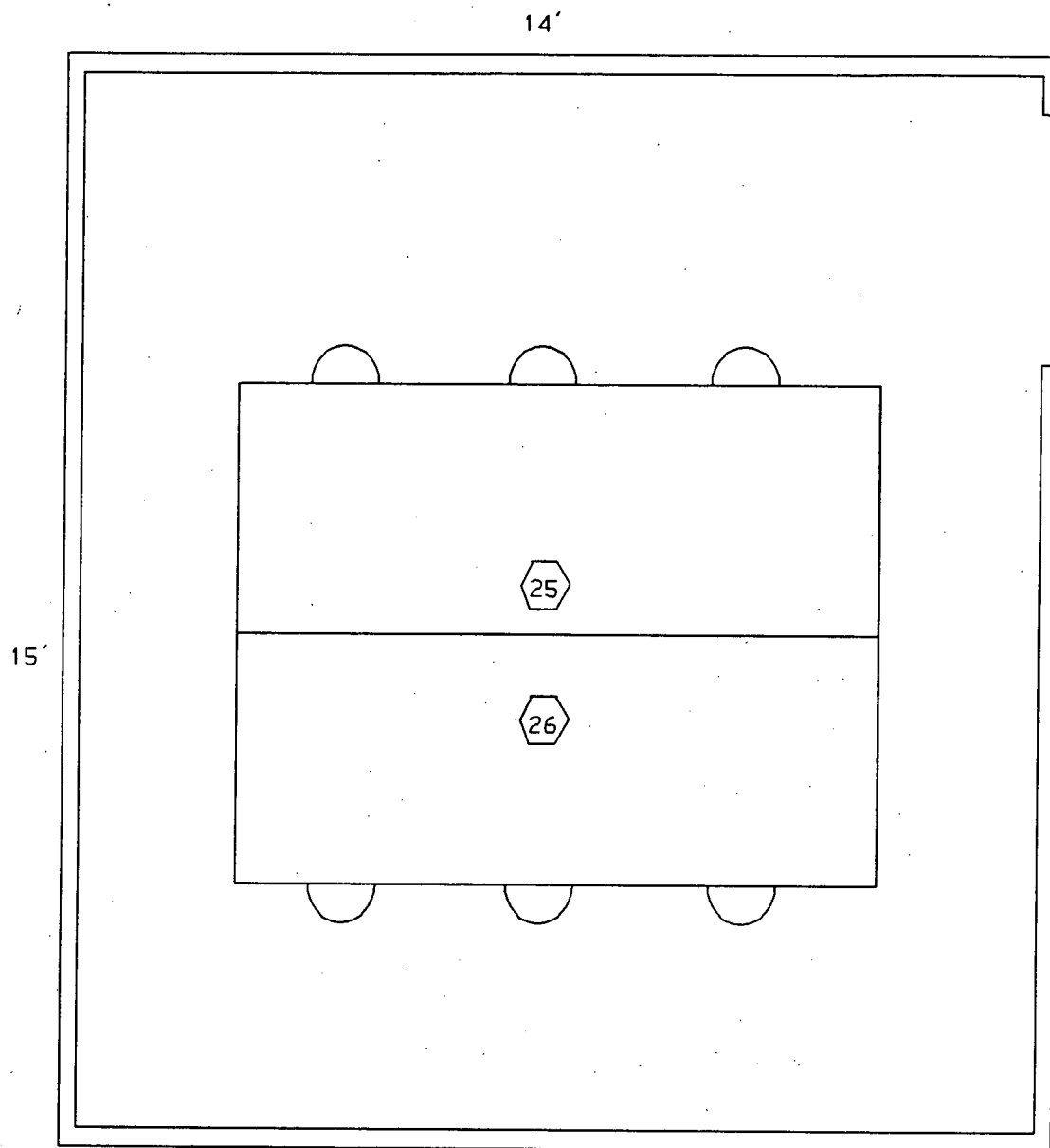
NUCLEAR DEPT. OFFICE AREA
DOSE PROJECTION CALCULATION/
EM TEAM DISPATCH
(192 SQ. FT.)



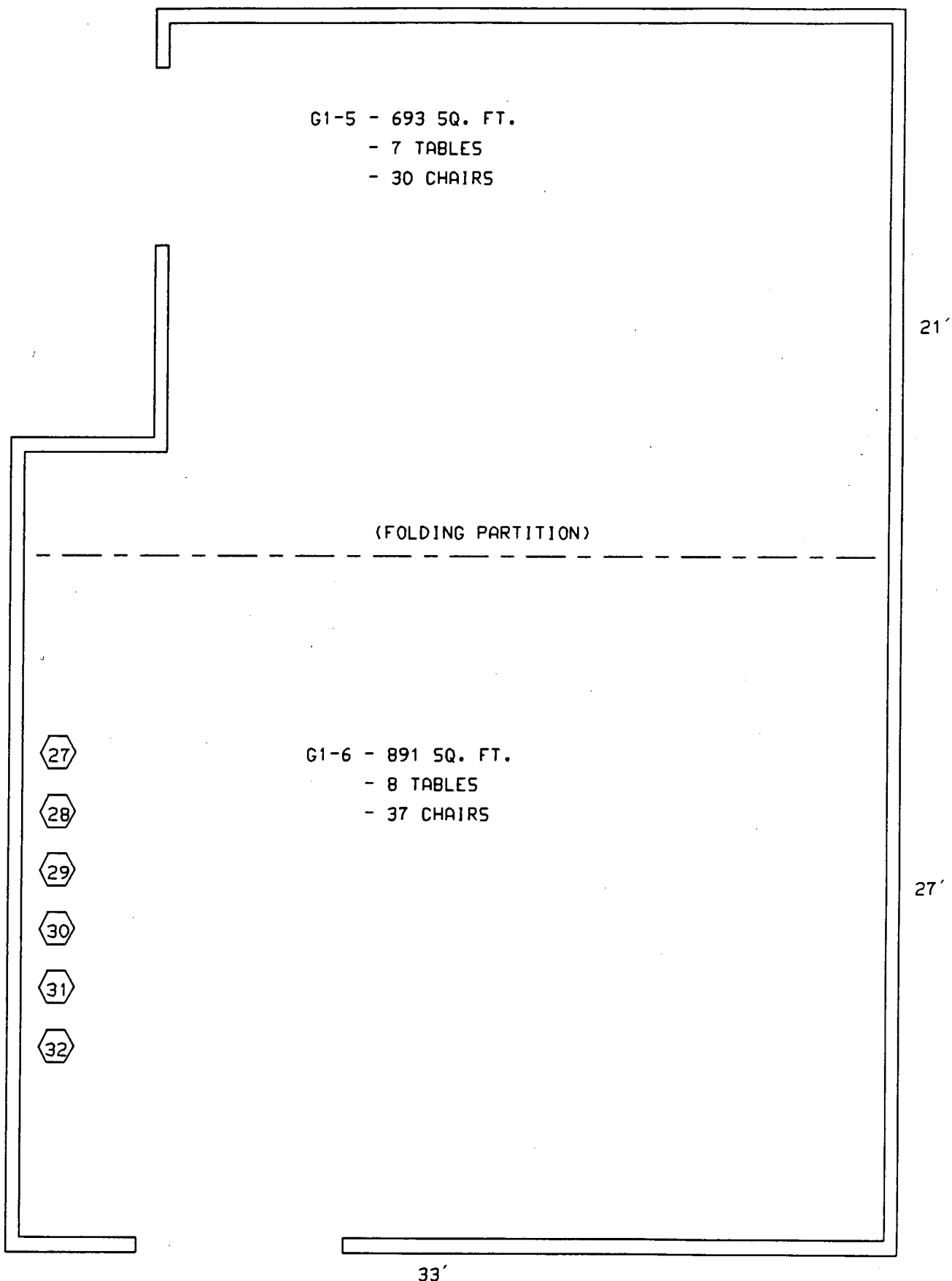
D2-6 NRC WORK AREA
(225 SQ. FT.)



D2-5 STATE/COUNTY WORK AREA
(210 SQ. FT.)



G1-5 & 6 EXPANDED NRC WORK AREA
(1584 SQ. FT. TOTAL)



Tommy G. Thompson
Governor
James R. Klauser
Secretary



Mailing Address:
Post Office Box 7865
Madison, WI 53707-7865
Phone: 608/266-3232

State of Wisconsin
Department of Administration

4802 Sheboygan Avenue, Room 99A • Madison, Wisconsin

March 20, 1987

Mr. David Seebart, Nuclear Emergency
Preparedness Coordinator
Wisconsin Public Service Corporation
P.O. Box 19002
Green Bay, WI 54307-9002

Dear Mr. Seebart:

The Wisconsin Division of Emergency Government wishes to express the State's support for the proposed move of the Wisconsin Public Service Corporation's Emergency Operations Facility from its current location at your Lakeshore Division Office on Columbus Street in Two Rivers to your corporate headquarters at 600 North Adams in Green Bay. We concur with your objective of providing your corporate management more direct access to and involvement with decision making during any possible radiological emergency.

We support this move with the understanding that you will continue to provide space, telephone, and electrical hook-ups at the Two Rivers facility, so that the State's Mobile Laboratory can continue to operate from that location if we choose to do so.

If you have any further questions, please contact me at (608) 266-1899.

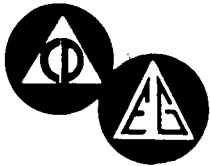
Sincerely,

A handwritten signature in cursive script, appearing to read "David Speerschneider".

David Speerschneider, Director
Bureau of Plans and Preparedness
Division of Emergency Government

DS:jlr:3558A

cc: Richard I. Braund
Wallace Weaver, FEMA Region V
Tom Johnson, Division of Health
Larry McDonnell, Section of Radiation Protection



ATTACHMENT G

KEWAUNEE COUNTY
DIVISION OF EMERGENCY
GOVERNMENT

416 FREMONT ST.
ALGOMA, WISCONSIN 54201

LYLE E. SCHMILING
DIRECTOR

HARVEY ZIMMERMAN, JR.
DEPUTY

February 27, 1987

Mr. David R. Seebart
Nuclear Emergency Preparedness Coordinator
Wisconsin Public Service
600 North Adams Street
P.O. Box 19002
Green Bay, WI 54307-9002

Dear David,

This letter is intended to support the idea of moving the Wisconsin Public Service EOF from Two Rivers to the Green Bay location.

As per our previous discussions, Kewaunee County has no problems with this move, rather we would welcome this change.

We feel that the move would be beneficial, in that Kewaunee County would receive information in an even flow rather than the possibility of a "blackout" due to the move from one location to another.

This move would provide easier access, to the EOF for our people, both in travel time and the possibility of distance to be covered.

Kewaunee County fully supports this proposed move.

Sincerely,

Lyle E. Schmiling, Director
Kewaunee County
Emergency Government

LES/mf

Office of
Emergency Government

NANCY H. CROWLEY
Emergency Government Director

Manitowoc County

1025 South Ninth Street
Manitowoc, Wisconsin
Phone 414-683-4207

February 23, 1987

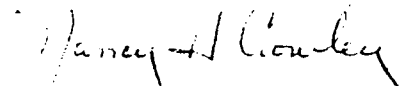
David R. Seebart
Nuclear Emergency Preparedness Coordinator
Wisconsin Public Service Corporation
600 N. Adams - P.O. Box 19002
Green Bay, WI 54307-9002

Dear David:

This letter, at your request, serves as support from Manitowoc County Emergency Government for Wisconsin Public Service Corporation to move your Emergency Operations Facility (EOF) to a Green Bay location.

In the past six years, there has been no apparent need for the WPS-EOF to be close at hand for County access if a solid communication link is operational. With the addition of the Delphi network to existing phone links, communication between Utility and County forces should be adequate for smooth operation during an exercise and/or emergency. We of course would like the option left open that should it be necessary to have a County staff person(s) present in your EOF, we may do so.

Sincerely,


Nancy H. Crowley, Director
Manitowoc County Emergency Government