

50-305

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SUBJECT: Forwards rev 20 to Kewaunee Nuclear Power Plant Emergency Plan. Attachment 1 has description of changes & effectiveness evaluation, rept is in attachment 2.

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April 9, 1998

10 CFR 50.54(q)

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

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Emergency Plan Revision 20

Modifications have been made to the Kewaunee Nuclear Power Plant (KNPP) Emergency Plan. A description of the changes and the effectiveness evaluation is included as Attachment 1 to this letter. A copy of the revised Emergency Plan is included as Attachment 2 to this letter. These changes do not decrease the effectiveness of the plan and continue to meet the standards of 10 CFR 50.47(b) and the requirements of Part 50, Appendix E; therefore, they are made in accordance with 10 CFR 50.54(q) 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 the U.S. Nuclear Regulatory Commission, Region III. As required, one copy of this letter and attachments is also submitted to the KNPP Senior Resident Inspector.

Sincerely,

Mark L. Marchi
Manager - Nuclear Business Group

DRS
Attach.

cc - Electric Division-PSCW w/o attach.
US NRC Senior Resident Inspector w/attach
US NRC, Region III (2 copies) w/attach.

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ATTACHMENT 1

Letter from Mark L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

April 9, 1998

DESCRIPTION OF CHANGES AND EFFECTIVENESS EVALUATION

EFFECTIVENESS EVALUATION KEWAUNEE NUCLEAR POWER PLANT

EMERGENCY PLAN REVISION 20

Policy Statement

Pg. i Description of Change

The policy page was re-signed by Vice President - Nuclear Power for the new revision 20. No changes to the text of the policy were made.

Effectiveness Evaluation

This change does not decrease the effectiveness of the plan.

TABLE OF CONTENTS

pg. viii Description of Change

The deletion date for Table 5-1 was changed to 3-30-95.

Effectiveness Evaluation

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

SECTION 1.0, INTRODUCTION

pg. 1.3-5 Description of Change

A new definition, "Priority Entry" was added to the section.

Effectiveness Evaluation

The addition of this definition and corresponding emergency plan implementing procedure change will address and close NRC Open Item 97013-01 written during the 1997 emergency preparedness exercise. This change does not decrease the effectiveness of the plan.

SECTION 2.0, SCOPE AND APPLICABILITY

Fig. 2-1 Description of Change

The block diagram line linking the Emergency Operations Facility to the off-site agencies was added.

Effectiveness Evaluation

This corrects an omission from the previous revision and does not decrease the effectiveness of the plan.

SECTION 4.0, EMERGENCY CONDITIONS, TABLE 4-1 "EMERGENCY CLASSIFICATION"

Tbl. 4-2 Description of Change

The revision number on page 2 of 2 was omitted during the previous revision and has now been added.

Effectiveness Evaluation

No content change was made to the table. This change does not decrease the effectiveness of the plan.

SECTION 7.0, EQUIPMENT AND FACILITIES

pg. 7.0-1 Description of Change

This page was reissued without change to the content of the page.

Effectiveness Evaluation

The contents of this page are repeated so one set of text was removed. This change does not decrease the effectiveness of the plan.

Fig. 7-1 Description of Change

- a. Changed the term "Site Access Facility" to "Site Boundary Facility."
- b. Removed the indication that there was a Fax machine in the Site Boundary Facility.

Effectiveness Evaluation

- a. This was an oversight during a previous plan revision that changed that facility's name. No function change was made. This change does not decrease the effectiveness of the plan.
- b. This change corrects a misconception that there is a Fax machine in the Site Boundary Facility. Each environmental field team has mobile Fax machine capability for field use and this equipment is stored in the Site Boundary Facility. The Site Boundary has adequate communication capability available to complete their function. This change does not decrease the effectiveness of the plan.

SECTION 8.0, MAINTAINING EMERGENCY PREPAREDNESS

pg. 8.2-4 Description of Change

The definition of "exercise" was changed to state that an exercise for demonstration of program effectiveness will be conducted every two years instead of every year. Additionally a commitment was made to conduct a "Facility-Wide Drill" on the non-exercise years.

Effectiveness Evaluation

This change implements the June 28, 1996 rule change to 10 CFR 50, Appendix E, which changed the annual exercise performance schedule to once every two years.

Since the beginning of the Emergency Preparedness Program at the Kewaunee Nuclear Power plant the State of Wisconsin, Division of Emergency Management and both Kewaunee and Manitowoc County Emergency Management agencies have participated annually in an emergency exercise with either the Kewaunee Nuclear Power Plant or the Point Beach Nuclear plant.

The Kewaunee Nuclear Power Plants commitment to conduct a "Facility-Wide Drill" on the now non-exercise years provides an opportunity for both State and local off-site agencies to participate in another drill event annually if they so desire. For the past several years State and local emergency management agencies have

supported the Kewaunee Nuclear Power Plant "utility only" drills by helping to man control cells in their respective Emergency Operations Center. These control cells provide realistic feed back, including notification and decision making processes, to the utility drill participants event though a full off-site response is not implemented. This practice is expected to continue.

The qualification of new Emergency Response Organization staff generated by plant staff turnover has not in the past or will in the future be dependant on drill participation for attaining qualification. The Emergency Plan Training program uses a combination of classroom and hands-on or walk-through training methods to prepare new or re-assigned Emergency Response Organization for the tasks to which they will be assigned. Each student is presented with training on the overall integrated response effort, the responsibilities and purpose of the facility in which their position responds and task specific training for procedural tasks they are expected to perform.

The Facility-Wide Drill will enhance that training and provide an opportunity for practical experience during the year between graded exercises.

This change does not decrease the effectiveness of the plan.

APPENDICES

Appx. C Description of Change

In general the complete appendix was reformatted and, where possible, information consolidated. Previous figures C-1 and C-6 were combined into new figure "EP Fig-026." Figure C-2 was changed to figure "EP Fig-031." The page describing the location descriptions for the Environmental Monitoring EPZ Grid Maps was not changed. Figure C-7 was not changed.

Effectiveness Evaluation

This change takes advantage of current drawing development and printing capabilities. The content of the previous information was not changed. This change does not decrease the effectiveness of the plan.

Appx. D Description of Change

All letters of agreement that have been updated since Revision 19 to this plan were corrected to show the correct and current issue dates.

Effectiveness Evaluation

This change does not decrease the effectiveness of the plan.

Appx. F,
pg. F-5

Description of change

The reference to inventory procedure, PMP-83-1 was replace with EPMP 10.1-1.

Effectiveness Evaluation

The remodeling of the Technical Support Center and Operational Support Facility prompted a consolidation of reference and supply materials. This consolidation was performed and the need for a separate inventory for the Operational Support Facility was diminished. All materials and references needed by the Operational Support Facility were incorporated into the inventory for the Technical Support Center. This change does not decrease the effectiveness of the plan.

Appx. G Description of Change

Emergency Plan Implementing Procedure title changes ware made to conform to existing procedures.

Effectiveness Evaluation

Procedural intent and function were not changed. These changes do not decrease the effectiveness of the plan.

Appx. I Description of Change

Where needed, figure references were changed to match current figure designations from changes that were implemented during previous Emergency Plan revisions.

Effectiveness Evaluation

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

INDEX

Description of Change

Updated the index to correct subject title changes.

Effectiveness Evaluation

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