

# CATEGORY 1

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SUBJECT: Forwards rev 22 to emergency plan.Description of changes & effectiveness evaluation included as attachment 1.Revised emergency plan included as attachment 2. C

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NRC-99-020

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March 18, 1999

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 22

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  
Vice President-Nuclear

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

March 18, 1999

DESCRIPTION OF CHANGES AND EFFECTIVENESS EVALUATION

# EFFECTIVENESS EVALUATION KEWAUNEE NUCLEAR POWER PLANT

## EMERGENCY PLAN REVISION 22

### Policy Statement

#### Description of Change

Clark Steinhardt, Senior Vice President - Nuclear Power, was replaced with Mark L. Marchi, Vice President - Nuclear.

#### Effectiveness Evaluation

Mr. Steinhardt will retire the end of January 1999. The Senior Vice President position will not be replaced. Mr. Marchi will assume all responsibilities of the Senior Vice President - Nuclear Power as Vice President - Nuclear. This change does not decrease the effectiveness of the plan.

### SECTION 1.0, Introduction

#### Description of Change

page 1.2-1 Changed the title Senior Vice President - Nuclear Power to Vice President - Nuclear and changed the title Nuclear Emergency Preparedness Supervisor to Process Leader - Emergency Preparedness.

#### Effectiveness Evaluation

These title changes do not change the responsibilities of the individual holding the position under the new title. This change does not decrease the effectiveness of the plan.

page 1.3-2 Description of Change

In the definition for Emergency Director, compressed the statement in parentheses and moved it to the end of the definition. Deleted the word "Note" in the definition.

#### Effectiveness Evaluation

The appropriate reference was maintained within the parentheses and the word "note" was not needed to identify the fact that the Shift Supervisor is the Emergency Director until relieved by a designated Emergency Director. This change does not decrease the effectiveness of the plan.

page 1.3-3 Description of Change

In the definition for Emergency Response Manager, deleted the reference to Table 5-1, "Correlation Between Normal and Emergency Organization Title." Replaced it with a clear reference to the Emergency Plan Implementing Procedure Appendix A-2 and Emergency Plan Appendix A.

Effectiveness Evaluation

Deletion of Table 5-1 from the Emergency Plan was performed in Revision 17 of the plan. The failure to delete references to the table within the text of the plan was an administrative oversight. The table was deleted because a more accurate description of individuals assigned to a given Emergency Response Organization position can be found in Appendix A-2 of the Emergency Plan Implementing Procedures which is updated quarterly instead of annually for the Plan. Also, keeping up with title changes that did not affect functional responsibility was not productive. Addition of the reference to Appendix A of the Emergency Plan provides the reader with a detailed listing of the responsibilities of the director position. This change does not decrease the effectiveness of the plan.

page 1.3-4 Description of Change

For the Environmental Protection Director and the Event Operations Director, deleted the reference to Table 5-1, "Correlation Between Normal and Emergency Organization Title." Replaced it with a clear reference to the Emergency Plan Implementing Procedure Appendix A-2 and Emergency Plan Appendix A.

Effectiveness Evaluation

Deletion of Table 5-1 from the Emergency Plan was performed in Revision 17 of the plan. The failure to delete references to the table within the text of the plan was an administrative oversight. The table was deleted because a more accurate description of individuals assigned to a given Emergency Response Organization position can be found in Appendix A-2 of the Emergency Plan Implementing Procedures which is updated quarterly instead of annually for the Plan. Also, keeping up with title changes that did not affect functional responsibility was not productive. Addition of the reference to Appendix A of the Emergency Plan provides the reader with a detailed listing of the responsibilities of the director position. This change does not decrease the effectiveness of the plan.

page 1.3-5 Description of Change

Changed the title Nuclear Emergency Preparedness Supervisor to Process Leader - Emergency Preparedness.

Effectiveness Evaluation

This is an administrative change with no change in responsibilities for the individual holding the position. This change does not decrease the effectiveness of the plan.

page 1.3-6 Description of Change

For the Nuclear Public Information Director, deleted the reference to Table 5-1, "Correlation Between Normal and Emergency Organization Title." Replaced it with a clear reference to the Emergency Plan Implementing Procedure Appendix A-2 and Emergency Plan Appendix A.

Effectiveness Evaluation

Deletion of Table 5-1 from the Emergency Plan was performed in Revision 17 of the plan. The failure to delete references to the table within the text of the plan was an administrative oversight. The table was deleted because a more accurate description of individuals assigned to a given Emergency Response Organization position can be found in Appendix A-2 of the Emergency Plan Implementing Procedures which is updated quarterly instead of annually for the Plan. Also, keeping up with title changes that did not affect functional responsibility was not productive. Addition of the reference to Appendix A of the Emergency Plan provides the reader with a detailed listing of the responsibilities of the director position. This change does not decrease the effectiveness of the plan.

page 1.3-7 Description of Change

- a. For the Radiological Protection Director, deleted the reference to Table 5-1, "Correlation Between Normal and Emergency Organization Title." Replaced it with a clear reference to the Emergency Plan Implementing Procedure Appendix A-2 and Emergency Plan Appendix A.
- b. For the definition of Site Boundary replaced the phrase "FIGURE C-2 for the general site location." with the phrase "page C-3."

Effectiveness Evaluation

- a. Deletion of Table 5-1 from the Emergency Plan was performed in Revision 17 of the plan. The failure to delete references to the table within the text of the plan was an administrative oversight. The table was deleted because a more accurate description of individuals assigned to a given Emergency Response Organization position can be found in Appendix A-2 of the Emergency Plan Implementing Procedures which is updated quarterly instead of annually for the Plan. Also, keeping up with title changes that did not affect functional responsibility was not productive. Addition of the reference

to Appendix A of the Emergency Plan provides the reader with a detailed listing of the responsibilities of the director position. This change does not decrease the effectiveness of the plan.

- b. The reference to the page is a simpler and more direct reference to the figure. This change does not decrease the effectiveness of the plan.

page 1.3-8      Description of Change

- a. For the Spokesperson, added the term Emergency Plan to the reference in the parentheses.
- b. For the Support Activities Director and the Technical Support Center Director, deleted the reference to Table 5-1, "Correlation Between Normal and Emergency Organization Title." Replaced it with a clear reference to the Emergency Plan Implementing Procedure Appendix A-2 and Emergency Plan Appendix A.

Effectiveness Evaluation

- a. This change provides a clearer reference to the reader and does not decrease the effectiveness of the plan.
- b. Deletion of Table 5-1 from the Emergency Plan was performed in Revision 17 of the plan. The failure to delete this reference to the table within the text of the plan was an administrative oversight. The table was deleted because a more accurate description of individuals assigned to a given Emergency Response Organization position can be found in Appendix A-2 of the Emergency Plan Implementing Procedures which is updated quarterly instead of annually for the Plan. Also, keeping up with title changes that did not affect functional responsibility was not productive. The addition of the reference to Appendix A of the Emergency Plan provides the reader with a detailed listing of the responsibilities of the director position. This change does not decrease the effectiveness of the plan.

**SECTION 2.0, Scope and Application**

page 2.1-1      Description of Change

- a. First paragraph, replace "FIGURE C-1" with "Page C-2."
- b. Second paragraph, replaced "FIGURE C-2 for the general site location" with "Page C-3."
- c. Fourth paragraph, replaced "FIGURE" with "Page."

Effectiveness Evaluation

- a. The reference to the page is a simpler and more direct reference to the figure. This change does not decrease the effectiveness of the Plan.
- b. The reference to the page is a simpler and more direct reference to the figure. This change does not decrease the effectiveness of the Plan.
- c. The reference to the page is a simpler and more direct reference to the figure. This change does not decrease the effectiveness of the Plan.

page 2.2-2 Description of Change

- a. First paragraph, deleted the phrase, "plan and procedure revisions" and added, "and Nuclear Administrative Directives govern changes to the Emergency Plan and its implementing procedures."
- b. Changed "Division of Emergency Management" to Wisconsin Emergency Management."
- c. Changed "Radiation Protection Unit" to "Division of Public Health, Radiation Protection Section."

Effectiveness Evaluation

- a. As previously written, the method by which the Emergency Plan and its implementing procedures maintained was not adequately defined. This change provides clearer definition and does not decrease the effectiveness of the plan.
- b. This is an administrative change made by the State of Wisconsin. No change in responsibilities or functions were made because of the title change. Therefore, this change does not decrease the effectiveness of the plan.
- c. This is an administrative change made by the State of Wisconsin. No change in responsibilities or functions were made because of the title change. Therefore, this change does not decrease the effectiveness of the plan.

Fig. 2-1 Description of Change

The agency title changes made by the State of Wisconsin described above were incorporated into the interrelationship flow diagram of this figure.



Effectiveness Evaluation

This is an administrative change made by the State of Wisconsin. No change in responsibilities or functions were made because of the title change. Therefore, this change does not decrease the effectiveness of the plan.

**SECTION 4.0, Emergency Conditions**

Chart A(2) Description of Change  
Step 1.

In keeping with approved revision "X" to procedure EP-AD-2, changed the capitalized phrase "Significant Core Damage" to lower case lettering and added parentheses around the sentence following this phrase.

Effectiveness Evaluation

No change was made to the content or intent of this sentence. This change does not decrease the effectiveness of the plan.

Chart A(2) Description of Change  
Step 3.

In keeping with approved revision "X" to procedure EP-AD-2, "Emergency Class Determination," changed the lower case typed phrase "containment high Radiation monitor" to a capitalized phrase.

Effectiveness Evaluation

No change was made to the content or intent of this sentence. This change does not decrease the effectiveness of the plan.

Chart B Description of Change

- a. In keeping with approved revision "X" to procedure EP-AD-2, "Emergency Class Determination," changed the "OR" statement format in the KNPP Indication section for Site Emergency to match the format of "and/or" usage in other sections of this chart. Also, changed all uses of the word "or" to a bold print and capital letter format.
- b. In keeping with approved revision "Y" to procedure EP-AD-2, "Emergency Class Determination," in the KNPP Indication column of the second from the bottom row for Unusual Event, the uCi/gran dose equivalent value for I-131 was changed from >1.0 to >0.2.

Effectiveness Evaluation

- a. No change was made to the content or intent of this sentence. This change does not decrease the effectiveness of the plan.
- b. Technical Specification page TS 3.1-8 was modified per Amendment 140. The Technical Specification change basis reads in part: "Reactor coolant specific activity is further limited to  $\leq 0.20$  uCi/gram DOSE EQUIVALENT I-131 to ensure that offsite thyroid dose does not exceed 10 CFR 100 guidelines and that control room thyroid dose does not exceed GDC-19." In keeping with this Technical Specification change, the Emergency Action Levels for a fuel damage event were reviewed and determined that the Unusual Event action level for uCi/gram value must also be changed.

A temporary change was reviewed by the PORC (No. 98-121, 11/23/98) and pen-and-ink changes made to all copies of procedure EP-AD-2, "Emergency Class Determination," in the Control Room, Simulator Control Room, Technical Support Center and Emergency Operations Facility.

This revision eliminates the temporary change to procedure EP-AD-2, "Emergency Class Determination." The revised value ( $>0.2$ ) for uCi/gram DOSE EQUIVALENT I-131 is a lower and more conservative value for this Emergency Action Level. Therefore, this change does not decrease the effectiveness of the plan.

## Chart P

Description of Change

In keeping with approved revision "X" to procedure EP-AD-2, "Emergency Class Determination," reversed the order of the words "flammable/toxic" and "explosive/toxic" and changed the "or" words to capital and bolded letters in the third KNPP Indication for a Site Emergency.

Effectiveness Evaluation

No change was made to the content or intent of this sentence. This change does not decrease the effectiveness of the plan.

## Chart Q

Description of Change

In keeping with approved revision "X" to procedure EP-AD-2, "Emergency Class Determination," the phrase, "on premises" was changed to "within the protected area" in the KNPP Indication section for Unusual Event.

The note at the bottom of the page was rewritten.

Effectiveness Evaluation

Changing the phrase “on premises” to “within the protected area” provides a clearer definition of the area around the plant that is appropriate for this level of event. The note change provides clearer definition on the availability of security to perform off-site notification and how that responsibility is to be filled if they are not available. No change to the intent of this chart was made. These changes do not decrease the effectiveness of the plan.

**SECTION 5.0, Organizational Control of Emergencies**page 5.1-1 Description of Change

- a. The prior first paragraph describing the positions that report to the Senior Vice President - Nuclear Power was deleted.
- b. New first paragraph, the title Site Vice President - Kewaunee Nuclear was changed to Vice President - Nuclear and the following position titles were added to those reporting to the Vice President - Nuclear:

Manager - Quality Programs  
 Process Leader - Business Planning  
 Nuclear Communication Supervisor  
 SGR Project Manager  
 Alliance Implementation Manager

- c. Second paragraph, changed “Human Resources” to “human resources.”
- d. Third paragraph, deleted “instrument and control.”
- e. Fourth paragraph, rewrote the sentence to read that the Manager - Engineering and Technical Support was responsible for “nuclear licensing and engineering and technical support.” Also changed “5-1.1” to “5-1.5.”
- f. The functions “health physics and life cycle management” were added and the functions “strategic planning, license renewal, high level waste and decommissioning” were deleted.

Effectiveness Evaluation

- a. At the end of January 1999 the Senior Vice President - Nuclear Power retired and all positional responsibilities were transferred to the Vice President - Nuclear. This change does not decrease the effectiveness of the plan.
- b. The position Site Vice President - Kewaunee Nuclear was replaced by Vice President - Nuclear and all corporate and plant nuclear positions that now

report to this new position are now identified. This change does not decrease the effectiveness of the plan.

- c. This reference was meant to be the function not the corporate group by the same name. This change does not decrease the effectiveness of the plan.
- d. The function of instrument and control is now under the direction of maintenance; that is, in turn, under the direction of the Manager - Kewaunee Plant. This change does not decrease the effectiveness of the plan.
- e. This change more clearly defines the responsibility of the Manager - Engineering and Technical Support including that of nuclear licensing. Also, an error in the figure number was corrected. These changes do not decrease the effectiveness of the plan.
- f. The functions deleted are covered under the functional areas currently described for the Nuclear Business Group. This change does not decrease the effectiveness of the plan.

page 5.1-2 Description of Change

- a. First paragraph, the title "Superintendent - Quality Programs" was changed to "Manager - Quality Programs."
- b. Second paragraph, the title "Nuclear Communications Coordinator" was changed to "Nuclear Communications Supervisor." A statement was added showing that this position now reports to the corporate Public Affairs Department. The word "of" was changed to "for" in the last sentence.

Effectiveness Evaluation

- a. This is an administrative change with no change in the responsibilities of the individual filling this position. This change does not decrease the effectiveness of the plan.
- b. This title is an administrative change with no change in responsibility of the individual filling this position. The return of this position to the Public Affairs Department goes back to the organization several years ago when these nuclear support functions were provided by the Public Affairs Department. This change does not decrease the effectiveness of the plan.

page 5.2-1 Description of Change

Third paragraph, the term "cross-trained" was changed to "trained."

Effectiveness Evaluation

Cross-training is the exception not the norm for the Emergency Response Organization. Almost all individuals assigned to the Emergency Response Organization are assigned only one position. The only exception to that is the Shift Technical Advisor who is also trained to be the Severe Accident Management Team Leader. In all cases, each individual is trained to any position they will be expected to fill. This change does not decrease the effectiveness of the plan.

page 5.2-2 Description of Change

Changed "Appendix A-6" to "Appendix A, page A-6" and "Appendix A-2" to "Appendix A, page A-2."

Effectiveness Evaluation

This change provides a clearer reference for the reader and does not decrease the effectiveness of the plan.

page 5.2-10 Description of Change

Last paragraph, deleted the reference "(see FIGURE 5-1.1 and 5-1.2)" and the phrase "in this organization can and."

Effectiveness Evaluation

Figures 5-1.1 and 5-1.2 no longer accurately reflect the entire corporate nuclear and non-nuclear organization. However, the commitment to provide whatever support is needed by the Wisconsin Public Service Corporation nuclear and non-nuclear staffs and organizations is not changed. This change does not decrease the effectiveness of the plan.

page 5.2-11 Description of Change

Changed "Appendix A-3" to "Appendix A, page A-3" and "Appendix A-12" to "Appendix, page A-12."

Effectiveness Evaluation

This change provides a clearer reference for the reader and does not decrease the effectiveness of the plan.

page 5.3-4 Description of Change

Changed "Division of Emergency Management (DEM)" to "Department of Military Affairs, Wisconsin Emergency Management (WEM)."

Effectiveness Evaluation

This is a State of Wisconsin administrative change. No change in functional responsibilities has resulted from this change. This change does not decrease the effectiveness of the plan.

page 5.3-5 Description of Change

Changed "Division of" to "Wisconsin" and "(DEM)" to "(WEM)."

Effectiveness Evaluation

This is a State of Wisconsin administrative change. No change in functional responsibilities has resulted from this change. This change does not decrease the effectiveness of the plan.

page 5.3-6 Description of Change

Added the phrase title, "Division of Public Health, Radiation Protection Section" after, "Wisconsin Department of Health and Family Services." and changed "(DEM)" to "(WEM)."

Effectiveness Evaluation

This is a State of Wisconsin administrative change. No change in functional responsibilities has resulted from this change. This change does not decrease the effectiveness of the plan.

Table 5-1 Description of Change

Table 5-1, "Correlation Between Normal and Emergency Organization Titles" may have been inadvertently left in some copies to the Emergency Plan following Revision 17 of the plan. This table is to be deleted.

Effectiveness Evaluation

Deletion of Table 5-1 from the Emergency Plan was performed in Revision 17 of the plan. The failure to delete references to the table within the text of the plan was an administrative oversight. The table was deleted because a more accurate description

of individuals assigned to a given Emergency Response Organization position can be found in Appendix A-2 of the Emergency Plan Implementing Procedures which is updated quarterly instead of annually for the plan. Also, keeping up with title changes that did not affect functional responsibility was not productive. This change does not decrease the effectiveness of the plan.

Fig. 5-1.1 Description of Change

Updated the "WPSC Nuclear Organization" block diagram to reflect the current nuclear organization under the Vice President - Nuclear.

Effectiveness Evaluation

This change is administrative in nature with no change in the functional support provided to the Emergency Plan. This change does not decrease the effectiveness of this plan.

Fig. 5-1.2 Description of Change

Updated the "WPSC Nuclear Organization" block diagram to reflect the current nuclear organization under the Manager - Nuclear Plant Support Services.

Effectiveness Evaluation

This change is administrative in nature with no change in the functional support provided to the Emergency Plan. This change does not decrease the effectiveness of this plan.

Fig. 5-1.3 Description of Change

Updated the "WPSC Nuclear Organization" block diagram to reflect the current nuclear organization under the Manager - Kewaunee Plant.

Effectiveness Evaluation

This change is administrative in nature with no change in the functional support provided to the Emergency Plan. This change does not decrease the effectiveness of this plan.

Fig. 5-1.4 Description of Change

Updated the "WPSC Nuclear Organization" block diagram to reflect the current nuclear organization under the Process Leader - Business Planning.

Effectiveness Evaluation

This change is administrative in nature with no change in the functional support provided to the Emergency Plan. This change does not decrease the effectiveness of this plan.

Fig. 5-1.5 Description of Change

Updated the "WPSC Nuclear Organization" block diagram to reflect the current nuclear organization under the Manager - Engineering and Technical Support.

Effectiveness Evaluation

This change is administrative in nature with no change in the functional support provided to the Emergency Plan. This change does not decrease the effectiveness of this plan.

**SECTION 6.0, Emergency Measures**

page 6.7-1 Description of Change

Last paragraph, changed "Table 6-5" to "Table 6-1."

Effectiveness Evaluation

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

Fig. 6-2 Description of Change

Changed "Wisconsin Division of Emergency Management" to " Wisconsin Emergency Management."

Effectiveness Evaluation

This is a State of Wisconsin administrative change. No change in functional responsibilities has resulted from this change. This change does not decrease the effectiveness of the plan.



**SECTION 7.0, Emergency Response Facilities**

page 7.1-1 Description of Change

Changed "FIGURE C-6 and C-7" to "pages C-2 and C-6."

Effectiveness Evaluation

This change provides a clearer reference to the reader and does not decrease the effectiveness of the plan.

**SECTION 8.0, Maintaining Emergency Preparedness**

page 8.1-1 Description of Change

Changed the title, "Senior Vice President - Nuclear Power" to "Vice President - Nuclear" and changed the title "Nuclear Emergency Preparedness Supervisor" to "Process Leader - Emergency Preparedness."

Effectiveness Evaluation

These changes are administrative in nature. The responsibilities of the retiring Senior Vice President - Nuclear Power were transferred to the Vice President - Nuclear and the responsibilities of the Process Leader - Emergency Preparedness are the same as those of the Nuclear Emergency Preparedness Supervisor. These changes do not decrease the effectiveness of the plan.

page 8.1-2 Description of Change

- a. Changed the title, "Senior Vice President - Nuclear Power" to "Vice President - Nuclear"
- b. Deleted the title "Engineering Programs Group Leader" from the description for the Nuclear Licensing Director.

Effectiveness Evaluation

- a. This change is administrative in nature. The responsibilities of the retiring Senior Vice President - Nuclear Power were transferred to the Vice President - Nuclear. These changes do not decrease the effectiveness of the plan.
- b. Do to an organizational change the Nuclear Licensing Director now reports directly to the Manager - Engineering and Technical Support. The responsibilities of the Nuclear Licensing Director have not changed. This change does not decrease the effectiveness of the plan.

page 8.1-3 Description of Change

- a. Changed the title, "Senior Vice President - Nuclear Power" to "Vice President - Nuclear."
- b. Changed the title "Nuclear Communications Coordinator" to "Nuclear Communications Supervisor."
- c. Changed "Nuclear Department Heads" to "Nuclear Group and Process Leaders."
- d. Changed the title "Manager - Nuclear Engineering" to "Process Leader - Business Planning."
- e. Changed the title "Nuclear Emergency Preparedness Supervisor" to "Process Leader - Emergency Preparedness."

Effectiveness Evaluation

- a. This change is administrative in nature. The responsibilities of the retiring Senior Vice President - Nuclear Power were transferred to the Vice President - Nuclear. These changes do not decrease the effectiveness of the plan.
- b. This change is administrative in nature. The responsibilities of the Nuclear Communications Supervisor are unchanged from those of the Nuclear Communications Coordinator. This change does not decrease the effectiveness of the plan.
- c. This change is administrative in nature. The term "department head" is no longer used in the nuclear organization. This change does not decrease the effectiveness of the plan.
- d. The position of Manager - Nuclear Engineering no longer exists. The Process Leader - Business Planning is the logical replacement to show and describe the management position that current group and process leaders report to. This change does not decrease the effectiveness of the plan.
- e. The responsibilities of the Process Leader - Emergency Preparedness are the same as those of the Nuclear Emergency Preparedness Supervisor. This change does not decrease the effectiveness of the plan.

page 8.1-4 Description of Change

Changed the title "Nuclear Emergency Preparedness Supervisor" to "Process Leader - Emergency Preparedness."

Effectiveness Evaluation

The responsibilities of the Process Leader - Emergency Preparedness are the same as those of the Nuclear Emergency Preparedness Supervisor. This change does not decrease the effectiveness of the plan.

page 8.2-1 Description of Change

- a. In the second paragraph, deleted the phrase, "and corporate."
- b. Performed a complete rewrite of section 8.2.1, "Emergency Preparedness Training Program."

Effectiveness Evaluation

- a. This corrects an inaccuracy. All emergency preparedness group staff now perform their duties from the plant. This change does not decrease the effectiveness of the plan.
- b. A rewrite was needed to align the commitments of the Emergency Plan with the terminology used in the Emergency Preparedness Training Program. All aspects of General Employee Training as well as initial, continuing, and special training continue to be provided. Only the format these topics cover has changed. Provisions to provide off-site training when needed is maintained. This change does not decrease the effectiveness of the plan.

**SECTION 9.0, Plant Recovery**page 9.1-1 Description of Change

Changed the title, "Senior Vice President - Nuclear Power" to "Vice President - Nuclear."

Effectiveness Evaluation

This change is administrative in nature. The responsibilities of the retiring Senior Vice President - Nuclear Power were transferred to the Vice President - Nuclear. These changes do not decrease the effectiveness of the plan.

page 9.3-1 Description of Change

Changed the title, "Senior Vice President - Nuclear Power" to "Vice President - Nuclear."

Effectiveness Evaluation

This change is administrative in nature. The responsibilities of the retiring Senior Vice President - Nuclear Power were transferred to the Vice President - Nuclear. These changes do not decrease the effectiveness of the plan.

**APPENDIX A, Emergency Organizational Structure, Function and Responsibilities**page A-2      Description of Change

Changed the title, "Senior Vice President - Nuclear Power" to "Vice President - Nuclear."

Effectiveness Evaluation

This change is administrative in nature. The responsibilities of the retiring Senior Vice President - Nuclear Power were transferred to the Vice President - Nuclear. These changes do not decrease the effectiveness of the plan.

page A-10      Description of Change

Item 3. Deleted the phrase, "at the Site Access Facility."

Effectiveness Evaluation

The Site Protection Director has the responsibility to provide for dosimetry issue. This is addressed in procedure EP-SEC-4, "Security Force Actions for Dosimetry Issue." This procedure addressed the task in a much broader manner than just at the Site Access Facility (since changed to Site Boundary Facility). The procedure states that the Environmental Monitoring Teams and Site Radiation Emergency Teams have dosimetry available at the Site Boundary Facility. The majority of the dosimeters will be issued in the Security Building as individuals arrive at the plant. The procedure also addresses the event in which the Security Building must be evacuated. In this case, the material needed to continue to issue dosimeters to responding plant personnel will be continued at whichever location the Security Force establishes their access control point. This change does not decrease the effectiveness of the plan.

**APPENDIX C, Maps**page C-1      Description of Change

Changed the title, "Emergency Response Facilities in the City of Green Bay, Wisconsin" to "Location of JPIC, MBC, GOB, DOB, Etc. - Map." Also changed the Figure Number from "N/A" to "EP Fig-024."

Effectiveness Evaluation

This change updates the Wisconsin Public Service, Green Bay complex map to show the current location of the Joint Public Information Center and Media Briefing Center in their new corporate office locations. All facilities and functions of these (the Joint Public Information Center and Media Briefing Center) were maintained in the location transfer. This change does not decrease the effectiveness of the plan.

page C-6

Description of Change

Changed the map titled, "Emergency Response Facilities in the City of Green Bay, Wisconsin" to "Location of JPIC, MBC, GOB, DOB, Etc. - Map."

Effectiveness Evaluation

This change updates the Wisconsin Public Service, Green Bay complex map to show the current location of the Joint Public Information Center and Media Briefing Center in their new corporate office locations. All facilities and functions of these (the Joint Public Information Center and Media Briefing Center) were maintained in the location transfer. This change does not decrease the effectiveness of the plan.

**APPENDIX D, Index of Letters of Agreement**page D1 & D2 Description of Change

Where appropriate, updated the dates on which existing letters of agreement were re-established.

Effectiveness Evaluation

All organizations holding letters of agreement, that were scheduled for review, were given the opportunity to review these agreements with Wisconsin Public Service Corporation. All organizations agreed to re-establish the agreements with little or no change in function. This change does not decrease the effectiveness of the plan.

**APPENDIX E, Radiological Emergency Response Plans**page E-1 Description of Change

The title "Nuclear Emergency Preparedness Supervisor" was changed to "Process Leader - Emergency Preparedness."

Effectiveness Evaluation

The responsibilities of the Process Leader - Emergency Preparedness are the same as those of the Nuclear Emergency Preparedness Supervisor. This change does not decrease the effectiveness of the plan.

**APPENDIX G, List of EIPs and Cross-References to the Emergency Plan**

page G-2      Description of Change

Underlined the procedure heading for section D.

Effectiveness Evaluation

This is a typographical change that does not decrease the effectiveness of the plan.

page G-4      Description of Change

In the title for procedure, EP-RET-5, capitalized the word "dose."

Effectiveness Evaluation

This is a typographical change that does not decrease the effectiveness of the plan.

page G-5      Description of Change

In the title for procedure, EP-TSC-4, changed the word "Design" to "Physical."

Effectiveness Evaluation

This change is in keeping with the change of all other plant procedures from the use of the term "Design Change" to "Physical Change." The tasks and functions previously covered under the heading Design Change are now performed under the heading Physical Change. This change does not decrease the effectiveness of the plan.

**APPENDIX H, Evacuation Time Estimates**

page H-1      Description of Change

Third paragraph, deleted the words, "the" and "Division of" so the phrase reads, "...evacuation order through Wisconsin Emergency Management."

Effectiveness Evaluation

This is a State of Wisconsin administrative change. No change in functional responsibilities has resulted from this change. This change does not decrease the effectiveness of the plan.

page H-4

Description of Change

Changed "Hwy 163" to "Co Trk AB."

Effectiveness Evaluation

Kewaunee and Manitowoc Counties have renamed Highway 163 to County Trunk AB. This change does not decrease the effectiveness of the plan.

page H-5

Description of Change

Changed "Hwy 163" to "Co Trk AB."

Effectiveness Evaluation

Kewaunee and Manitowoc Counties have renamed Highway 163 to County Trunk AB. This change does not decrease the effectiveness of the plan.