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January 31, 1996

10 CFR 50, App. E

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

Ladies/Gentlemen:

Operating License DPR-43
Kewaunee Nuclear Power Plant
Radiological Emergency Response Plan Implementing Procedures

Pursuant to 10 CFR 50 Appendix E, Wisconsin Public Service Corporation hereby submits one copy of the latest revisions to the Kewaunee Nuclear Power Plant Radiological Emergency Response Plan Implementing Procedures (EPIPs). These revised procedures supersede the previously submitted procedures.

Pursuant to 10 CFR 50.4, two additional copies of this letter and attachment are hereby submitted to Mr. H. Miller, Regional Administrator, U. S. Nuclear Regulatory Commission, Region III, Lisle, Illinois. As required, one copy of this letter and attachment is also submitted to the Kewaunee Nuclear Power Plant NRC Senior Resident Inspector.

Sincerely,

Mark L. Marchi

m & march

Manager-Nuclear Business Group

With District

RPP/jmf

Attachment

cc - NRC Senior Resident Inspector, w/attach.
US NRC, Region III (2 copies), w/attach.
Mr. Lanny Smith, PSCW, w/o attach.
QA Vault, w/attach.

QA vauit, w/attach

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KEWAUNEE NUCLEAR POWER PLANT

January 25, 1996

REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES

RETURN TO: FRAN ARNO - ATF-2

OUTSIDE AGENCY COPIES (1-20)

R. Pulec - NRC Document Control Desk (1)*

R. Pulec - NRC Region III (2 & 3)*

R. Pulec - NRC Resident Inspector at KNPP (4) (Inspector also receives copies of Appendix A phone numbers)*

R. Pulec - State of Wisconsin (5)*

R. Pulec - KNPP QA Vault with NRC Letter (15)*

Training (Off-Site) (11, 12)*

<u>PERSONAL COPIES</u> (21-40) These copies are for the personal use of the listed individuals for reference or emergency response.

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A. Prokash (33)

D. Mielke (35).

G Holmes (132)

J. Mueller (13)

REFERENCE COPIES - CUSTODIAN (41-100) These copies are for general reference by anyone. They are distributed throughout the plant and corporate offices. The named individual is the responsible custodian for the procedures and shall insure they are properly maintained.

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K. Lipp - Corporate Nuclear (85)

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C. Long - SBF/EMT (54)

C. Long - RPO (55)

WORKING COPIES (101-199) These copies of procedures are kept in the areas designated for use in response to an emergency. These are not complete sets, but contain only those procedures that are used to implement activities in the location where they are kept. Please dispose of any sections distributed that are not tabbed in the indicated copy.

J. Mueller - TSC (101, 102, 103, 104, 105)

C. Long - RAF/RPO (106, 107)

C. Long - SAF/ENV (108, 109)

C. Long - SAF/EM Team (110, 111, 111A)

C. Long - T. R. Hospital (118, 119)

W. Flint - Cold Chem/HR Sample Room (113)

B. Presl - SAF/SEC (114)

M. Anderson - CR/Communicator (116)

Simulator/Communicator (117)

D. Nalepka - Security (121)

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L. Neumeier-EOF (122)

K. Evers (125)

C. Smoker (127)

B. Heitzkey-EOF (128)

D. Sauer-EOF (130)

D. Shannon (131)

Originals to KNPP QA Vault

Please follow the directions when updating your EPIP Manual. WATCH FOR DELETIONS!!! These are controlled procedures and random checks may be made to ensure the manuals are kept up to date.

*THIS IS NOT A CONTROLLED COPY. IT IS A COPY FOR INFORMATION ONLY.

KEWAUNEE NUCLEAR POWER PLAN IMPLEMENTING PROCEDURES
January 25, 1996

Please follow the directions listed below. If you have any questions regarding changes made to the EPIPs, please contact Bill Bartelme at ext. 2820. If you are a controlled copy holder (see cover page), return this page to Fran Arno by February 01, 1996, SIGNED AND DATED to serve as a record of revision.

Please delete EP-ENV-3D from your manuals. This procedure was suppose to be deleted on the 02-14-95 distribution but the memo did not reflect that. The index that is currently in your EPIP manual should read correctly. If you have any questions, please contact Cathy Quarberg at Ext. 2321. Thanks!

I CERTIFY Copy No. (WPSC No.) of the Kewaunee Nuclear Power Plant's EPIPs has been updated.

SIGNATURE DATE

Please return this sheet to FRAN ARNO, KNPP - ATF-2.

Cathy Zuarberg

Plant Procedures

Enclosure

WISCONSIN PUBLIC SERVICE CORP NO.: **EP-ENV-3D** REV. KEWAUNEE NUCLEAR POWER PLANT TITLE: REVISION AND CONTROL OF ISODOSE II EMERGENCY PLAN IMPLEMENTING DATE: MAR 1 6 1993 PAGE 1 OF 7 **PROCEDURES** REVIEWED BY APPROVED BY M RESPONSIBLE DATE NUCLEAR DATE **SUPERVISOR** MANAGER GREEN BAY/KEWAUNEE Lectuit 3/2/93 REVIEWED BY NUCLEAR DATE **EMERGENCY** PREPAREDNESS SUPV. PORC REVIEW REQUIRED YES NO 1.0 **PURPOSE** The purpose of this procedure is to define the requirements for modifying the ISODOSE Π software and to control distribution of program disks. The ISODOSE II software is considered to be controlled, nonsafety related as defined by ACD 1.9. 2.0 **APPLICABILITY** This procedure will apply whenever revisions are required for the ISODOSE II software. when software disks are distributed, and to verify that the available software disk is REVISION: 1 3.0 REFERENCES 3.1 NAD 5.23, "Software Development and Control^a 3.2 Comtrak 85-026. 3.3 EP-ENV-3C. "Dose Projection Using ISODOSE II Software" "Preparation and Control of Emergency 3.4 **EPMP** Plan Implementing Procedurés" DEFINITIONS N/A

WISCONSIN PUBLIC SERVICE CORP

KEWAUNEE NUCLEAR POWER PLANT

NO.: EP-ENV-3D REV. J

TITLE: REVISION AND CONTROL

OF ISODOSE II

EMERGENCY PLAN IMPLEMENTING PROCEDURES

DATE: PAGE 2 OF 7

5.0 REQUIREMENTS

5.1 Documentation of Software

Software documentation will include:

- 5.1.1 Flow diagrams of each algorithm used for calculating off-site dose.
- 5.1.2 A data dictionary which describes all unique program variables and constants (see Section 5.9).
- 5.1.3 Test cases (two) for each algorithm used to calculate off-site doses. These test cases will be designed to bound the limits of each algorithm.
- 85.1.4 References that are not in the public domain or not otherwise available will be kept by the primary EPD filed under "EP-ENV-3C REFERENCES." These references will include plant specific calculations used by the software algorithms, test cases, or other similar types of documentation.

5.1.5 The ISODOSE II Program Manual.

- 5.2 Software Accessibility
 - 5.2.1 This software is intended for use by the Environmental Protection Director (EPD), the Radiological Protection Director (RPD) or their designee's for use in calculating off-site doses from plant releases. No specific restrictions for use of this software apply.
 - 5.2.2 Two software masters will be maintained in a secure location. These will be designated as Master A and Master B. Master A will be maintained by the Plant Computer Group. Master B will be maintained by the primary EPD and will serve as the backup copy.
 - 5.2.3 Program copies released for field use shall not be modifiable by the user. Therefore, only compiled versions of the software will be released for field use.
 - 5.2.4 The program is available on the GBNUC1 and KNPP1 file servers (local area networks).

WISCONSIN PUBLIC SERVICE CORP KEWAUNEE NUCLEAR POWER PLANT

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5.3 Modification of Software

- A software change request shall be prepared by the primary EPD or his 5.3.1 designee for any modification of the ISODOSE II software.
- 5.3.2 The primary EPD will also be responsible for the following:
 - (a) Updating the documentation required in Section 5.1 to reflect the modified software.
 - (b) Obtaining PORC approval of the revised software (PORC approval required for all EPIPs).
- 5.3.3 The Plant Computer Group will be responsible for making the necessary software modifications. The updated documentation specified by Section 5.1 will serve as the software design specification.
- 5.4 Verification and Validation

Software verification and validation will be accomplished by performing the test cases required in step 5.1.3. The primary EPD will prepare and execute the test cases. The PORC will review the executed test cases. This PORC review will be considered to be the independent verification.

- 5.5 ISODOSE II Program Mamual
 - The primary EPD will maintain the ISODOSE II Program Manual. 5.5.1
 - The purpose of the manual is to document procedures, precautions, limitations, program, algorithms, and the help index.
- 5.6 Review and Approval

Review and approval of this procedure and the ISODOSE II software will be as specified by EPMP 5.2.

WISCONSIN PUBLIC SERVICE CORP KEWAUNEE NUCLEAR POWER PLANT

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5.7 Distribution

Copies of program disks are to be distributed as follows:

COPY NUMBER	LOCATION	RESPONSIBLE PERSON
1 2 3 4 Master A Master B	Emergency Operation Facility Radiological Analysis Facility Technical Support Center State of Wisconsin (Interpreted Version) (Interpreted Version)	W.M. Bartelme C.D. Long W.M. Bartelme P.S. Schmidt D.P. Schmeider D.W. Sauer

5.8 Labeling Program Disks

Program disks will be labeled with the following information:

ISODOSE II: OFF-SITE DOSE PROJECTION COMPUTER PROGRAM

DATE	REVISION
COPY NO	

5.9 Data Element Dictionary

The Data Element Dictionary will be maintained as a resource for the software programmer and the software user (see Form ENV 3D.1). Because the Data Element Dictionary is an integral part of the ISODOSE II software, it may be accessed at any time by selecting the HELP function in the ISODOSE II program menu. The information to be included in the Data Element Dictionary is as defined below.

5.9.1 PROGRAM NAME

The name assigned to the program in which the data element appears.

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5.9.2 FIELD NAME

The FIELD NAME should be created so that it describes the purpose or function of the data element. This name should be concise, but not cryptic. Abbreviations should conform to the standard abbreviations adopted for KNPP. The FIELD NAME will be used to label data elements on input screens and printouts whenever possible. If less than 18 characters it may also be used as the VARIABLE NAME for most PC applications. The FIELD NAME is limited to a maximum of 50 characters.

5.9.3 INPUT or PROGRAM VARIABLES

There are two types of variables used by the ISODOSE II software: INPUT VARIABLES - variables or "data" entered by the user and PROGRAM VARIABLES - preprogrammed values not accessible to the user except for viewing in the HELP feature of the software.

5.9.4 OTHER NAME(S)

Alternate names may be assigned to the variable described by the FIELD NAME. OTHER NAMES may be necessary for use as column headings or in displays where the FIELD NAME exceeds the space available. When possible, the FIELD NAME must be used.

5.9.5 VARIABLE NAME

The name assigned as the VARIABLE NAME should be the same as or a shortened version of the FIELD NAME. Most PC software doesn't limit the length of variable names, however a maximum of 18 characters is being specified for convenience in programming.

5.9.6 **DESCRIPTION**

The description provides information about the variable. When writing the description try to answer who, what, when, where and why. It is not always possible to include all of these for each data element, but attempting to answer as many of these questions as possible will assure a thorough description. Appropriate references should also be included.

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5.9.7 VARIABLE UNITS

VARIABLE UNITS are the units a variable value is describing. Some variables may be dimensionless such as some ratios. When the variable has no corresponding units write NONE.

5.9.8 FIELD LENGTH

The FIELD LENGTH should normally be limited to no more than 80 or 120 characters depending on the number of columns available on the display screen or paper. FIELD LENGTH can be increased for text or descriptive information.

5.9.9 LOW RANGE VALUE

If you wish to prohibit a variable from being less than some minimum value, that minimum value must be specified as the LOW RANGE VALUE. The LOW RANGE VALUE is useful for checking data used by the program.

5.9.10 HIGH RANGE VALUE

Same as the LOW RANGE VALUE except that it specifies a maximum value for the variable.

5.9.11 VARIABLE REPRESENTATION

The VARIABLE REPRESENTATION uses character descriptions to create a representation of the variable as it will appear in the programming, program reports, or input screens. An accurate VARIABLE REPRESENTATION allows the programmer to include data checking or data validation in the finished software. A variable with a LOW RANGE VALUE of 1.2x10⁺¹ and a HIGH RANGE VALUE of 9.999x10⁺¹⁴ would be represented as N.NNNE+ZN.

5.9.12 DEPAULT VALUE

DEPAULT VALUES may be specified for the convenience of the software user. DEFAULT VALUES are automatically loaded into the data field when the program user has not specified a value.

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5.9.13 ARRAY SIZE

Program data may be contained in tables or "arrays." For data, this format indicates the dimensions of the array.

5.9.14 REQUIRED VARIABLES

Some variables are necessary for proper operation of the program software, others are not. Those variables (like RELEASE FLOW RATE) that are necessary are designated as "REQUIRED." Other variables (SAMPLE LOCATION, for example) are not necessary for proper operation and are designated as "NOT REQUIRED."

5.9.15 SELECTED VARIABLES

A SELECTED VARIABLE is a variable for which there is a limited number of options available to the user. These variables are typically a YES/NO response, days of the week, or months of the year.

5.9.16 VALIDATION CRITERIA and SELECTED VARIABLES

Specify any other limits or conditions the programmer may use to validate the data being entered. For example, "only months with 31 days may be entered," or "only odd numbered days may be entered."

Selected variables are two or more program options that may be chosen by the software user. Selected variables are useful when there is a limited number of known values for a variable. Selected variables can be more convenient for the program user, and allows the programmer to include error checking which will prohibit the operator from entering inappropriate values for the selected variable. A list of "selectable" options or a range of options should be included in this section.

6.0 RESPONSIBILITIES

The primary Environmental Protection Director is the Responsible Supervisor for all software modifications. Reviews shall be in compliance with NAD 5.23.