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Rev 8/25/97

SUBJECT: Informs that mods have been made to plant Emergency Plan. Description of changes & SE & revised Emergency Plan are encl.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

June 6, 1997

10 CFR 50.54(q)

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

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Emergency Plan Revision 19

Modifications have been made to the Kewaunee Nuclear Power Plant (KNPP) Emergency Plan. A description of the changes and the safety evaluations are 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,

M L Marchi
M. L. Marchi
Manager - Nuclear Business Group

DRS
Attach.

100006

cc - Mr. Lanny Smith, 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 M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

June 6, 1997

DESCRIPTION OF CHANGE AND SAFETY EVALUATION

SAFETY EVALUATION KEWAUNEE NUCLEAR POWER PLANT

EMERGENCY PLAN REVISION 19

Policy Statement

Pg. i Description of Change

The policy page was resigned by Vice President - Nuclear Power for the new revision 19. No changes to the text of the policy were changed.

Safety Evaluation

This change does not decrease the effectiveness of the plan.

TABLE OF CONTENTS

pg. ii Description of Change

The table of contents format was changed to include revision letter and date information by plan sub-section.

Safety Evaluation

This change improves the ability to verify that each section of the plan is of the correct revision. This change does not decrease the effectiveness of the plan.

SECTION 2.0, SCOPE AND APPLICABILITY

pg. 2.2-2 Description of Change

Where appropriate the word "Government" was replaced with "Management" and the word "Social" was replaced with "Family."

Safety Evaluation

These are administrative changes that do not decrease the effectiveness of the plan.

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Fig. 2-1 Description of Change

Changed the title "WI Div. of Emergency Government" to "WI Div. of Emergency Management", the title "WI Dept. of Health and Social Services" to "WI Dept. of Health and Family Services" and the title "Manitowoc County Emergency Government" to "Manitowoc County Emergency Management."

Safety Evaluation

These are administrative changes that do not decrease the effectiveness of the plan.

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

Tbl. 4-2 Description of Change

- a. Line (8), changed "lock rotor of RC pump" to "(locked rotor of RXCP)."
- b. Line (13), changed "major failure of one elements's cladding" to "(cladding rupture of all rods in one complete fuel assembly)" and changed "Site Emergency" to "Alert."
- c. Line (15), changed the word "water" to "waste."
- d. Line (16), added modifying statements for less than and greater than 800 gpd condition. Also assigned appropriate emergency classification levels to those conditions.
- e. Line (17), rewrote the entire event description.
- f. Line (19), changed "including fuel damage" to "(with damage to fuel assemblies)." Also changed "Alert" to "Site Emergency."
- g. Line (20), changed "Alert to" to "Unusual Event, Alert or."

Safety Evaluation

- a. This change more accurately reflects the wording of the USAR and does not decrease the effectiveness of the plan.

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- b. This change more accurately reflects the wording of the USAR and the reclassification to an Alert provides a more accurate emergency action level based on the plant indications and criteria currently stated in Table 4-1 of this plan. This change does not decrease the effectiveness of the plan.
- c. This change corrects a typographical error and does not decrease the effectiveness of the plan.
- d. The addition of the greater than and less than 800 gpd conditions and their corresponding emergency level provides a more accurate description to the reader and does not decrease the effectiveness of the plan.
- e. This change more accurately reflects the wording of the USAR and does not decrease the effectiveness of the plan.
- f. This change more accurately reflects the wording of the USAR and the reclassification to a Site Emergency provides a more accurate emergency action level based on the plant indications and criteria currently stated in Table 4-1 of this plan. This change does not decrease the effectiveness of the plan.
- g. Primary coolant leaks as described in the USAR have the potential for initiating a declared emergency in any of the first three levels. This change does not decrease the effectiveness of the plan.

SECTION 5.0, ORGANIZATIONAL CONTROL OF EMERGENCIES

pg. 5.2-2 Description of Change

In the sentence describing who will fill the Emergency Response Manager position the term "corporate management staff" was replaced with "Kewaunee Nuclear Department staff."

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Safety Evaluation

Changes to the Nuclear Department organization and work locations have made the previous statement incorrect. The individuals assigned to the Emergency Response Manager (ERM) position have not changed but their work locations have. The ERM position will continue to be filled from within the Nuclear Department but not necessarily the corporate nuclear group. This change does not decrease the effectiveness of the plan.

pg. 5.2-5 Description of Change

Clarification was added to link the plant Radiation Technologists to the appropriate Emergency Response Organization title and to state that this positions responsibilities include the performance of off-site dose assessments.

Safety Evaluation

This change was made in response to an NRC Temporary Instruction 2515/134, "Licensee On-Site Dose Assessment Capabilities." The Temporary Instruction directed NRC inspectors to review and ensure that clear identification of on-shift capabilities for performing off-site dose assessment were stated and maintained. The wording changes to this section reflect our long standing commitment and practice of providing on-shift dose assessment capabilities. This change does not decrease the effectiveness of the plan.

pg. 5.2-8 Description of Change

- a. The term "Operations Supervisor" was replaced with "Process Owner."
- b. The number of Fire Brigade members was changed from "three" to "five" with a modifier stating that the make-up of that team is defined in the Kewaunee Nuclear Power Plant, Fire Plan.
- c. The sentence stating that plant operating staff provide members for the Fire Brigade was deleted.

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Safety Evaluation

- a. This change is administrative in nature and does not decrease the effectiveness of the plan.
- b. This change provides a more accurate description of the Fire Brigade team size and the added reference to the Kewaunee Nuclear Power Plant, Fire Plan provides the reader with a more accurate reference for defining the make-up of the fire brigade. This change does not decrease the effectiveness of the plan.
- c. Stating that plant operations staff will make-up the members of the fire brigade is misleading. The fire brigade is made up of operations, health physics and security staff. Referencing the reader to the Kewaunee Nuclear Power Plant, Fire Plan provides clearer definition. This change does not decrease the effectiveness of the plan.

pgs.

5.3-5

thru

5.3-8 Description of Change

Where appropriate, references to "Emergency Government" were changed to "Emergency Management" for the State of Wisconsin and Manitowoc County. References to "Health and Social Services" were changed to "Health and Family Services." Also the location of the State of Wisconsin's Emergency Operating Center was changed from "Hill Farms State Office" to the "Department of Military Affairs Building."

Safety Evaluation

These change are administrative in nature or provides the current and correct location of the State of Wisconsin's Emergency Operating-Center location and do not decrease the effectiveness of the plan.

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Fig.

5-1.4 Description of Change

Changed the title, "Nuclear Vendor Services Supervisor" to "Process Leader - Nuclear Vendor Services." Deleted the title, "Senior Nuclear Consultant."

Safety Evaluation

These change are administrative in nature and do not represent a reduction in support for the Emergency Response Organization. These changes do not decrease the effectiveness of the plan.

Fig.

5-1.5 Description of Change

Changed the following titles: "Physical Change Process Leader" to "Process Leader - Physical Change"; "Engineering Program Group Leader" to "Engineering Program Group"; "Special Projects Process Leader" to "Process Leader - Special Projects"; "Analytical Engineering Group Leader" to "Analytical Engineering Group"; "Evaluation and Projects Process Leader" to "Process Leader - Evaluation and Projects"; "Eight (8) System Group Leaders" to "Eight (8) Plant Systems Groups"; and "Records Management Group Leader" to "Records Management Group."

Safety Evaluation

These change are administrative in nature and do not represent a reduction in support for the Emergency Response Organization. These changes do not decrease the effectiveness of the plan.

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SECTION 6.0, EMERGENCY MEASURES

pg. 6.2-3 Description of Change

Added a sentence describing the availability, redundant availability and electrical supply of the computer based dose projection program.

Safety Evaluation

This change was made in response to an NRC Temporary Instruction 2515/134, "Licensee On-Site Dose Assessment Capabilities." The Temporary Instruction directed NRC inspectors to review and ensure that clear identification of on-shift capabilities for performing off-site dose assessment were stated and maintained. The wording changes to this section reflect our long standing commitment and practice of providing on-shift dose assessment capabilities. This change does not decrease the effectiveness of the plan.

Sec. 6.4 Description of Change

A new revision number (19) was assigned to this section. No changes to the text were made.

Safety Evaluation

This adjustment was made so that this section's revision number complied with the new revision tracking table of contents established within Revision 19 of the plan. This change does not decrease the effectiveness of the plan.

pg.6.5-1 Description of Change

Changed the manual title, "Kewaunee Nuclear Power Plant Radiation Protection Training Manual" to "Kewaunee Nuclear Power Plant General Employee Training Manual."

Safety Evaluation

This change corrects an incorrect reference and does not decrease the effectiveness of the plan.

Safety Evaluation - KNPP Emergency Plan - Revision 19

pg. 6.6-1 Description of Change

Changed the manual title, "Kewaunee Nuclear Power Plant Radiation Protection Training Manual" to "Kewaunee Nuclear Power Plant General Employee Training Manual."

Safety Evaluation

This change corrects an incorrect reference and does not decrease the effectiveness of the plan.

pg. 6.6-2 Description of Change

Where appropriate references to "Division of Emergency Government" and "Department of Health and Family Services" were changed to "Division of Emergency Management" and "Department of Health and Family Services" respectively.

Safety Evaluation

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

pg. 6.7-4 Description of Change

The sentence stating that at least one physician on the hospital staff has attended radiological health instruction was deleted.

Safety Evaluation

Hospital emergency room staff are trained and drilled annually at the Two Rivers Community Hospital and Kewaunee Nuclear Power Plant, Emergency Plan Implementing Procedures continue to provide for plant Radiation Protection Technician support at the hospital. Therefore the intent of NUREG-0654 is still met and this change does not decrease the effectiveness of the plan.

Safety Evaluation - KNPP Emergency Plan - Revision 19

pg. 6.8-3 Description of Change

The reference to "Local Emergency Broadcast Station (LEBS) was replaced with "Emergency Alerting System (EAS).

Safety Evaluation

The function of the new Emergency Alerting System is the same as that of the Emergency Broadcasting System. This change does not decrease the effectiveness of the plan.

Fig. 6-2 Description of Change

The Title "Wisconsin Division of Emergency Government" was changed to "Wisconsin Division of Emergency Management."

Safety Evaluation

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

SECTION 7.0, EQUIPMENT AND FACILITIES

pg. 7.2-1 Description of Change

The reference to NAWAS was deleted.

Safety Evaluation

This change corrects an over sight from a past revision. The NAWAS was successfully replaced by the Dial-Select as the primary means for contacting off-site authorities several years ago. This change does not decrease the effectiveness of the plan.

Safety Evaluation - KNPP Emergency Plan - Revision 19

pg. 7.3-3 Description of Change

- a. The last sentence of the first paragraph was deleted.
- b. In the last paragraph, the word "Shield" was replaced by "Containment."

Safety Evaluation

- a. This sentence provided more detail than is needed in the emergency plan. The commitment to maintain the both the process and area radiation monitoring capability is not changed. Complete plant system descriptions are available that describe this detail when needed. This change does not decrease the effectiveness of the plan.
- b. This corrects incorrect terminology and does not decrease the effectiveness of the plan.

pg. 7.5-1 Description of Change

- a. Deleted the sentence stating that the decontamination area is within close proximity to the first aid room.
- b. Deleted the detail on the type of medical supplies that are available.
- c. Deleted the specific reference to where first aid kits are maintained and added the reference stating that first aid kits are available in company owned vehicles.

Safety Evaluation

- a. Deletion of this sentence corrects an incorrect statement. Although decontamination facilities continue to be maintained they are not in close proximity to the first aid room described in the plan. This change dose not decrease the effectiveness of the plan.
- b. & c. This level of detail is not needed in this plan. The commitment to maintain adequate numbers of first aid kits on-site and in company vehicles will be maintained. Plant procedures identify the medical supplies that will be maintained and are available when needed. This change does not decrease the effectiveness of the plan.

Safety Evaluation - KNPP Emergency Plan - Revision 19

SECTION 8.0, MAINTAINING EMERGENCY PREPAREDNESS

pg. 8.2-7 Description of Change

- a. In the first paragraph, deleted the phrase "and liquid."
- b. In the second paragraph, changed the drill focus from obtained direct vegetation and soil samples to identifying and determining gross radiation readings of simulated radiologically contaminated areas.

Safety Evaluation

- a. & b. This change brings the Emergency Plan in agreement with the method agreed upon by the State of Wisconsin, Division of Health and Family Services - Radiation Protection Unit and the Kewaunee Nuclear Power Plant staff. The agreed method is that the Kewaunee Plant environmental monitoring team will focus their efforts on locating areas of surface contamination and report those locations to the State. The State, who have prompt access to laboratories capable for analyzing radiological environmental samples, will order and coordinate sample acquisition. The Kewaunee radiological laboratories are not set up with the appropriate count geometries to perform accurate environmental sample analysis. However, should the Kewaunee Plant feel it necessary a letter of agreement is maintain with Teledyne Laboratory, capable of responding on a 24 hour basis, to provide this service. This change does not decrease the effectiveness of the plan.

pg. 8.5-1 Description of Change

Replaced the word "Government" with "Management Agencies."

Safety Evaluation

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

Safety Evaluation - KNPP Emergency Plan - Revision 19

APPENDICES

Appx. D Description of Change

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

Safety Evaluation

This change does not decrease the effectiveness of the plan.

Appx. F Description of change

- a. Deleted the copy of the Emergency Plan in the Operations Support Facility.
- b. Deleted the copy of the Emergency Plan Implementing Procedures from the Operations Support Facility but continued the source reference as available in the Technical Support Center just outside the Operational Support Facility door.

Safety Evaluation

- a. The working group in the Operational Support Facility do not have a need for an Emergency Plan copy. Issues requiring reference to the Emergency Plan would be taken up in the Emergency Operations Facility or the Technical Support Center where Emergency Plan copies are maintained. This change does not decrease the effectiveness of the plan.
- B. Position specific sets of Emergency Plan Implementing Procedures have been developed and placed in the Technical Support Center. Position specific packets for Operational Support Facility members are in the same location. With these packets a set of Emergency Plan Implementing Procedures in the Operational Support Facility is not needed. However, a reference that a full set of Emergency Plan Implementing Procedures is available in the Technical Support Center just outside the Operational Support Facility door. This change does not decrease the effectiveness of the plan.

Safety Evaluation - KNPP Emergency Plan - Revision 19

Appx. G Description of Change

Where appropriate, emergency plan implementing procedure titles were corrected or deleted.

Safety Evaluation

These changes provide an accurate listing of the emergency plan implementing procedures currently in place. These changes do not decrease the effectiveness of the plan.

Appx. H Description of Change

Where appropriate the word "Government" was replaced with "Management" through out this appendix.

Safety Evaluation

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

Pg. H-4 & 5 Description of Change

A figure number was added to the page.

Safety Evaluation

This change does not decrease the effectiveness of the plan.