

WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

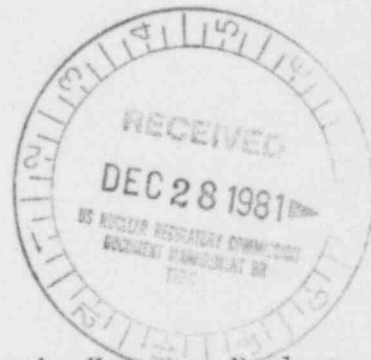
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December 8, 1981

Mr. J. G. Keppler, Regional Administrator  
 Office of Inspection & Enforcement  
 Region III  
 U. S. Nuclear Regulatory Commission  
 799 Roosevelt Road  
 Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305  
 Operating License DPR-43  
 Kewaunee Nuclear Power Plant  
Preparation for an Emergency Preparedness Exercise



In support of the upgraded emergency preparedness at the Kewaunee Nuclear Power Plant, and to comply with the requirements of 10 CFR 50, Appendix E, WPS is in advanced stages of preparation for an emergency exercise. We are concerned about the level of involvement of offsite response agencies for the exercise we plan to conduct in February and seek your concurrence with the following interpretations of sections of 10 CFR 50, Appendix E.

Section IV.F1:

A full-scale exercise which tests as much of the licensee, State, and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted;

- a. For each site at which one or more power reactors are located and licensed for operation, at least once every five years and at a frequency which will enable each State and local government within the plume exposure pathway EPZ to participate in at least one full scale exercise per year and which will enable each State within the ingestion pathway to participate in at least one full-scale exercise every three years.

WPS interprets this as a requirement for an annual exercise of the Kewaunee and Manitowoc County Emergency Government organizations, and that on at least five year intervals the State will participate in the exercise conducted with these counties. The State has a similar annual requirement, however, on a rotating basis, it may participate in the exercise conducted at a number of licensed facilities to meet both the annual and five year requirements. (The three year requirement for the State of Wisconsin is met by compliance with the five year requirement of several licensees.)

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More specifically, and a matter of concern to the two county organizations, is to recognize that a full scale exercise of each county organization is required only annually, recognizing that there are two licensed facilities with plume exposure EPZ's contained within each county. The rule expects an annual exercise of each organization to assure an adequate level of preparedness; to exercise the county organizations on a semi-annual basis imposes an unreasonable hardship, both financial and for personnel, on these organizations whose performance depends greatly on volunteers engaged in other activities. We further interpret this section to be met, by both licensees, by alternating the site of the initiation of the annual exercise between the Point Beach and Kewaunee facilities. On alternate years at which time a full scale exercise is not conducted, we interpret the exercise requirements as follows:

Section IV.F3:

A small scale exercise which tests the adequacy of communication links, establishes that response agencies understand the emergency action levels, and tests at least one other component (e.g., medical or offsite monitoring) of the offsite emergency response plan for licensee, State, and local emergency plans for jurisdictions within the plume exposure pathway EPZ shall be conducted at each site at which one or more power reactors are located and licensed for operation each year a full-scale exercise is not conducted which involves the State(s) within the plume exposure pathway EPZ.

The small scale exercise will include the establishment of communication links with the offsite agencies and communication of information relevant to the exercise which will meet the intent of the above. Further, in addition to a full activation of the on site emergency organization, at least one site specific component of the offsite planning will be exercised. Specifically, however, in consideration of the full scale exercise conducted at one of the two sites (Kewaunee or Point Beach), full county response will not be required at the site of the small scale exercise. ✓

It is our understanding, from joint conversations with members of your staff, FEMA Region V, State of Wisconsin, Manitowoc County, Wisconsin Electric Power Company and WPS personnel (and, separately, Kewaunee County officials) that the presented position is acceptable.

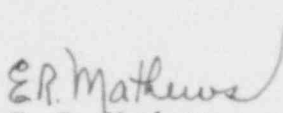
In a related matter we wish to address the request made in reference (1), the full scale exercise to be performed between April 1, 1981, and April 1, 1982. In January, 1981, a full scale exercise was conducted centered on an incident at the Kewaunee Plant; there was full activation of the State and County response organizations under observation of FEMA. WPS did not exercise its emergency plan because of its early stage of revision, but did support communication to the agencies. The offsite exercise received a generally favorable FEMA review and identified weaknesses are being addressed. WPS submits that, in consideration of that exercise conducted in January, 1981, only a

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small scale exercise need be conducted prior to April 1, 1982, as discussed above. We understand that prior to April 1, 1982, a full scale exercise will be conducted at the Point Beach facility.

As before, all agencies involved have indicated, informally, that this position is acceptable. We, therefore, advise you of our intent to conduct a small scale exercise the week of February 22, 1982. In the event you find this position unacceptable, WPS must submit an exercise scenario to FEMA and NRC Regions for review by January 8, 1982 (45 days prior to the exercise as outlined in B. K. Grimes' letter of February 2, 1981, to NRC Regional Directors), and considerable schedule alterations of State and FEMA personnel must be made. Consequently, we urge you to advise us of your position in this matter at your earliest opportunity.

Very truly yours,



E. R. Mathews  
Senior Vice President  
Power Supply & Engineering

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cc - Mr. S. A. Varga, US NRC  
Mr. J. Pagliaro, US NRC  
Mr. B. K. Grimes, US NRC  
Mr. J. L. LaFleur, Emergency Government  
Mr. E. Lipke, WEP Co.  
Mr. Gordon Wenger, Federal Emergency Mgt Agency, Reg V  
Mr. C. F. Riederer, PSCW  
Mr. Robert Nelson, US NRC