



Kewaunee Nuclear Power Plant
N490, State Highway 42
Kewaunee, WI 54216-9511
920-388-2560

Operated by
Nuclear Management Company, LLC



March 20, 2001

10 CFR 50, App. E

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
RADIOLOGICAL EMERGENCY RESPONSE PLAN IMPLEMENTING PROCEDURES

Pursuant to 10 CFR 50 Appendix E, Nuclear Management Company, LLC 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 the 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,

Thomas J. Webb
Director-Site Nuclear Licensing

SLC

Attachment

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

A045

KEWAUNEE NUCLEAR POWER PLANT

March 20, 2001

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

RETURN TO DIANE FENCL - KNPP

OUTSIDE AGENCY COPIES (1-20)

T. Webb - NRC Document Control Desk (1)*	Bob Hayden - Wisconsin Electric Power Co. (10)
T. Webb - NRC Region III (2 & 3)*	Craig Weiss - Wisconsin Power & Light (11)
T. Webb - NRC Resident Inspector (4) (receives Appx. A phone numbers)*	
T. Webb - State of Wisconsin (5)*	
T. Webb - KNPP QA Vault w/NRC Letter (15)*	

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

J. Bennett (33)	D. Mielke (35)	L. Moseler (13)	K. Hoops (28)
D. Masarik (32)	D. Seebart (24)	B. Bartelme (34)	

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.

STF (86, 87, 88)	LOREB - STF (62, 67, 68, 70, 72, 73, 74)
L. Duggan - Fuel Services (65)	STF Library (43)
QP Library - KNPP (59)	Resource Center (82, 89, 94, 131)
C. Sternitzky - ATF-2 (44)	D. Schrank - Maintenance Off. (41)
D. Braun - Admin. Bldg. Upper (45)	M. Anderson - CR/SS Office (51, 56)
P. Ehlen - I&C Office (42)	P&FS Adm - GB-D2 (84)
M. Daron - Security Building (46)	L. Moseler - TSC (50)
P&FS Adm - GB D2-3 (EOF) (81)	C. Long - RAF (53)
L. Moseler - OSF (52)	C. Long - SBF/EMT (54)
C. Hutter - ATF-1 (64)	C. Long - RPO (55)
LOREB - ATF-1 (66)	

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.

C. Long - RAF/RPO (106, 107)	M. Anderson - CR/Communicator (116)(Partial Distribution)
C. Long - SBF/ENV (108, 109)	Simulator/Communicator (117)
C. Long - SBF/EM Team (110, 111, 111A)	J. Fletcher - Security (121)
C. Long - Aurora Medical Center (118, 119)	N. Deda - Security Building (120)
W. Flint - Cold Chem/HR Sample Room (113)	L. Moseler (125)
N. Deda - SBF/SEC (114)	J. Stoeger (126)

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 PLANT
REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES
March 20, 2001**

Please follow the directions listed below. If you have any questions regarding changes made to the EIPs, please contact Dave Seebart at ext. 8719. If you are a controlled copy holder (see cover page), return this page to Diane FencI by April 20, 2001, SIGNED AND DATED to serve as a record of revision.

EPIP Index, dated 03-20-2001.

DELETE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-03	AA	EPIP-AD-03	AB
EPIP-AD-04	AB	EPIP-AD-04	AC
EPIP-TSC-10	H	EPIP-TSC-10	I

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

SIGNATURE

DATE

Please return this sheet to *DIANE FENCL*.


Diane FencI

Enclosure

EMERGENCY PLAN IMPLEMENTING PROCEDURES

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EP-AD			
EPIP-AD-01	Personnel Response to the Plant Emergency Siren	F	03-28-2000
EPIP-AD-02	Emergency Class Determination	Z	03-07-2000
EPIP-AD-03	KNPP Response to an Unusual Event	AB	03-20-2001
EPIP-AD-04	KNPP Response to Alert or Higher	AC	03-20-2001
EP-AD-5	Site Emergency	Deleted	04-27-87
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	B	08-29-2000
EP-AD-6	General Emergency	Deleted	04-24-87
EPIP-AD-07	Initial Emergency Notifications	AM	01-30-2001
EP-AD-8	Notification of Alert or Higher	Deleted	02-26-96
EP-AD-9	Notification of Site Emergency	Deleted	04-27-87
EP-AD-10	Notification of General Emergency	Deleted	04-27-87
EP-AD-11	Emergency Radiation Controls	P	08-10-99
EP-AD-12	Personnel Assembly and Accountability	Deleted	03-26-94
EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
EP-AD-13B	Emergency Assembly/Evacuation	Deleted	03-01-83
EP-AD-13C	Site Evacuation	Deleted	03-01-83
EP-AD-14	Search and Rescue	Deleted	05-25-94
EPIP-AD-15	Recovery Planning and Termination	N	08-29-2000
EP-AD-16	Occupational Injuries or Vehicle Accidents During Emergencies	Deleted	03-14-97
EP-AD-17	Communications	Deleted	03-05-84
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EP-ENV			
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EP-ENV-3A	Environmental Protection Director Actions and Directives	Deleted	09-26-84
EP-ENV-3B	EM Team Actions	Deleted	09-26-84
EPIP-ENV-03C	Dose Projection Using RASCAL Version 2.2 Software	U	02-16-2000
EP-ENV-3D	Revision and Control of ISODOSE II	Deleted	02-14-95
EP-ENV-3E	Manual Determination of X/Q	Deleted	04-24-87
EP-ENV-3F	Manual Determination of X/Q (Green Bay Meteorological Data)	Deleted	05-30-86
EP-ENV-3G	Manual Dose Projection Calculation	Deleted	06-02-89
EP-ENV-3H	Protective Action Recommendations	Deleted	04-13-90
EPIP-ENV-04A	Portable Survey Instrument Use	S	06-15-2000
EPIP-ENV-04B	Air Sampling and Analysis	V	09-12-2000
EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
EPIP-ENV-04C	Ground Deposition Sampling and Analysis	V	09-12-2000
EPIP-ENV-04D	Plume Tracking for Environmental Monitoring Teams	M	09-12-2000
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
EP-ENV-5C	SAM II Operation	Deleted	04-14-86
EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
EP-ENV-5E	Reuter-Stokes Operation	Deleted	08-27-85
EP-ENV-6	Data Analysis, Dose Projections and Protective Action Recommendations	Deleted	12-21-81
EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
EP-ENV-7	Site Access Facility Communications	Deleted	09-26-84
EP-ENV-8	Total Population Dose Estimate Calculations	Deleted	04-14-86

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EPIP-EOF-2	Emergency Operations Facility (EOF) Activation	X	10-24-2000
EPIP-EOF-03	Corporate Action for Unusual Event	Z	06-01-2000
EPIP-EOF-04	Corporate Action for Alert or Higher	AF	06-01-2000
EP-EOF-5	Corporate Staff Action for Site Emergency	Deleted	04-24-87
EP-EOF-6	Corporate Staff Action for General Emergency	Deleted	04-24-87
EP-EOF-7	Notification of Unusual Event	Deleted	04-06-94
EP-EOF-8	Relocation of EOF	Deleted	03-01-83
EPIP-EOF-08	Continuing Emergency Notifications	S	09-26-2000
EP-EOF-9	Interface with Support Organizations	Deleted	03-05-84
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EPIP-EOF-11	Internal Communication and Documentation Flow	T	06-01-2000
EPIP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center Security	O	10-24-2000
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EP-OP-2	Emergency Control Room Activation for Emergency Response	Deleted	04-24-87
EP-OP-3	Control Room Communications	Deleted	04-24-87
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EPIP-OSF-02	Operational Support Facility Operations	S	08-29-2000
EPIP-OSF-03	Work Requests During an Emergency	N	09-12-2000
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EP-RET-2B	Gaseous Effluent Sample and Analysis	Q	03-03-98
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EP-RET-2D	Emergency Radiation Entry Controls and Implementation	L	07-27-99
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
EP-RET-2F	Personnel Decontamination	Deleted	04-13-90
EPIP-RET-03	Chemistry Emergency Team	O	02-01-2000
EP-RET-3A	Liquid Effluent Release Paths	K	01-12-99
EP-RET-3B	Post-Accident Reactor Coolant Alternate Sampling Procedure	Deleted	01-25-88
EP-RET-3C	Post Accident Operation of the High Radiation Sample Room	O	01-18-2000
EP-RET-3D	Containment Air Sampling Analysis Using CASP	M	01-18-2000
EP-RET-3E	Post Accident Operation of High Rad Sample Room Inline Multiported Count Cave	Deleted	08-27-85
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EP-RET-4C	Site Radiological Monitoring	Deleted	07-12-94
EP-RET-4D	SAM-II Operation	Deleted	07-12-94
EP-RET-5	Plume Projection	Deleted	09-26-84
EPIP-RET-05	Site Boundary Dose Rates During Controlled Plant Cooldown	G	07-18-2000
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EPIP-RET-08	Contamination Control of the Aurora Medical Center	O	06-15-2000
EPIP-RET-09	Post-Accident Population Dose	K	08-29-2000
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EPIP-SEC-02	Security Force Response to Emergencies	V	10-31-2000
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EPIP-SEC-03	Personnel Assembly and Accountability	X	03-28-2000
EPIP-SEC-04	Security Force Actions for Dosimetry Issue	O	02-16-2000
EP-SEC-5	Security Force Response to the EOF	Deleted	07-28-88
EPIP-SEC-05	Personnel Evacuation	E	02-16-2000
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EPIP-TSC-02	Technical Support Center Activation	R	07-18-2000
EP-TSC-3	Plant Status Procedure	T	07-21-98
EPIP-TSC-04	Emergency Physical Changes, Major Equipment Repair	L	08-29-2000
EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
EPIP-TSC-07	RV Head Venting Time Calculation	H	03-07-2000
EPIP-TSC-08A	Calculations for Steam Release from Steam Generators	M	03-07-2000
EPIP-TSC-08B*	STMRLS Computer Program	E	03-07-2000
EP-TSC-8C*	See EP-TSC-8B	Deleted	04-16-92
* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			

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EPIP-TSC-09B*	CORE Computer Program	I	03-07-2000
EP-TSC-9C*	See EP-TSC-9B	Deleted	04-16-92
* EP-TSC-9A, Rev. D was totally deleted; therefore, EP-TSC-9B became EP-TSC-9A. EP-TSC-9B was previously EP-TSC-9C.			
EPIP-TSC-10	Technical Support for IPEOPs	I	03-20-2001

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EPIP-APPX-A-06	EP-FIG-008	APPX-A-06-01	Radiological Analysis Facility - KNP Floor Plan	A	10-31-2000
EPIP-EOF-12 Form EPIPF-EOF-02-01	EP-FIG-009	EOF-12-01	Division Office Building (2nd Floor) Floor Plan	B	10-24-2000
EPIP-APPX-A-06	EP-FIG-012	APPX-A-06-08	State/County Work Area - WPSC D2-1 Floor Plan	C	10-31-2000
EPIP-APPX-A-06	EP-FIG-013	APPX-A-06-09	NRC Work Area - WPSC D2-4 Floor Plan	A	10-31-2000
EPIP-AD-19	EP-FIG-014	AD-19-01	Population Distribution by Geographical Sub-Areas (with sectors)	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-022	APPX-A-06-04	EOF - WPSC D2-3 Floor Plan	B	10-31-2000
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EP-OSF-2	EP-FIG-039		High Priority Work	ORIG	07-08-98
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EPIP-APPX-A-06	EP-FIG-043	APPX-A-06-10	JPIC - Federal Work Area - WPSC D2-9	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-044	APPX-A-06-07	JPIC - State and County Work Area - WPSC D2-8	A	10-31-2000
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EPIP-APPX-A-3	Off-Site Telephone Numbers	BJ	09-12-2000
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AD 7.2	State Call-Back - Question Guideline	B	04-16-96
AD 11.1	Emergency Radiation Work Permit	F	04-16-96
EP-ENV			
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ENV-01-03	Meteorological and Plant Status Data	B	10-31-2000
ENV-01-04	EMT Orders/Field Data	B	10-31-2000
ENV-02-01	EMT Activation Checklist	M	06-15-2000
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EOF-02-02	EOF Deactivation Checklist	K	10-24-2000
EOF 4.1	SRCL Initial Action Checklist	B	09-16-97
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EOF 8.3	Fax for Emergency Declaration or Status Updates	F	09-21-99
EOF 8.5	Plant Emergency Status Report	ORIG	02-21-95
EOF 8.6	Radiological Status Report	C	03-14-97
EOF 11.2	Operating Status	E	02-14-95
EOF 11.3	Environmental Status Board	E	07-31-95
EOF-12-01	I.D. Badge Registration Form	G	10-24-2000
EP-OSF			
OSF 2.2	Maintenance Work in Progress	Deleted	07-08-98
OSF-03-01	Operational Support Facility Team Briefing	B	09-12-2000
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RET 2B.1	Containment Stack Release (Grab Sample)	C	04-16-96
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RET 2B.4	Containment Stack (Sping Reading)	B	04-16-96
RET 2B.5	Steam Release	C	04-16-96
RET 2B.6	Field Reading (Grab Sample)	A	04-16-96
RET 4	SAM-II Counting Equipment Worksheet	D	04-16-96
RET 8.3	Hospital Survey 1	E	07-25-97
RET 8.4	Hospital Survey 2	Deleted	07-25-97
RET 8.5	Hospital Survey 3	Deleted	07-25-97
RET-08-06	Hospital Survey 4	F	06-15-2000
RET 9	Environmental TLD Record Sheet	C	02-14-95
EP-SEC			
SEC-03.01	Emergency Accountability Log	A	03-28-2000
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TSC 1.2	Severe Accident Management Summary and Strategy Recommendation	A	04-01-99
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TSC-02-03	Emergency Response Data System (ERDS) Link Initiation Checklist	G	01-11-2001
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TSC 3.1	Plant System Status	K	02-14-95
TSC 3.2	Plant Equipment Status	K	08-12-97
TSC 3.3	Environmental Status Board	I	04-16-96
TSC 3.4	Radiation Monitors	G	02-14-95
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TSC 8A.1	Steam Release Data Sheet (Energy Balance)	G	02-14-95
TSC 8A.2	Steam Release Calculation Sheet (Energy Balance)	F	02-14-95
TSC 8A.3	Steam Release Data/Calculation Sheet (Open Valve)	D	02-14-95
TSC 8A.4	Steam Release Data/Calculation Sheet (STMRLS Program)	C	04-16-96
TSC 9A.1	Core Damage Based on Reactor Vessel Level & Fuel Rod Temp.	C	02-14-95
TSC 9A.2	Core Damage Based on Radiation Monitors	C	02-14-95
TSC 9A.3	Cs-134 and Cs-137 PCF Determination	D	04-16-96
TSC 9A.4	Core Damage Based on Activity Ratios	C	02-14-95
TSC 9A.5	Core Damage Assessment (Monitoring Data)	D	04-16-96
TSC 9A.6	Core Damage Summary	C	02-14-95

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-AD-03	Rev.	AB	
		Title	KNPP Response to an Unusual Event			
		Date	MAR 20 2001	Page 1 of 21		
Reviewed By <i>[Signature]</i>		Approved By <i>[Signature]</i>				
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

1.0 Purpose

- 1.1 This procedure provides instruction for the Shift Manager/Emergency Director and other initial response personnel for an appropriate response to an **Unusual Event**.

2.0 General Notes

- 2.1 The **Shift Manager (SM) is the initial Emergency Director (ED)** in all situations. Any transfer of this responsibility shall be documented in the Shift Manager's log and communicated to all on-site directors.
- 2.2 At the Unusual Event level, radio-pager activation will be performed by Control Room personnel for all designated emergency response directors (primary and alternate).
- 2.3 IF notified by radio-pager and the message is not understood, THEN emergency response personnel should confirm contact by telephoning Meridian Mail at 1-800-236-1588. A Meridian Mail voice message will indicate that the radio-pager activation was for an **actual** declared emergency and **not** a drill or exercise.
- 2.4 IF approached by the media during a declared emergency, THEN refer them to the Joint Public Information Center (JPIC) at 920-433-1400 or 1-800-838-6192 and tell them that this is their most accurate source for information.

3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07.01, should be initiated and in progress to state and local emergency governments within 15 minutes of the emergency level being declared, or as soon as possible without further compromise to plant or public safety.
- 3.2 The SM should remain in the Control Room during a declared emergency.
- 3.3 The following responsibilities of the ED shall not be delegated.
- 3.3.1 Determination of emergency classification (EPIP-AD-02).
- 3.3.2 Authorization of emergency exposures in excess of 10 CFR Part 20 limits (EPIP-AD-11).
- 3.3.3 UNTIL the Emergency Response Manager assumes the responsibility following EOF activation, recommendations of protective actions to off-site authorities (EPIP-AD-19).

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- 3.4 The ED should carefully consider the status of activities (especially those identified in step 3.3 above) before relocating to the TSC. Relocation to the TSC prior to TSC activation is not recommended.

4.0 Initial Conditions

- 4.1 This procedure shall be implemented upon declaration of an **Unusual Event**.

5.0 Procedure

- 5.1 SM/ED shall take the following Initial Actions:

- 5.1.1 Contact the Shift Technical Advisor (STA) and direct them to report to the Control Room.
- 5.1.2 The SM/ED has the option to require assembly based on the nature of the event and their judgement of threat to plant staff safety. In case assembly is not warranted, **GO TO step 5.1.4.**
- 5.1.3 IF assembly could present an unacceptable risk to plant employees as a result of a security event, THEN DO NOT initiate assembly. **GO TO step 5.1.6** (Ref: Operations Procedure E-0-08).
- 5.1.4 Choose and perform the appropriate plant announcement using plant Gai-tronics.
- 5.1.5 IF the plant Gai-tronics is not available, THEN instruct the Notifier/Communicator to immediately perform step 5.5.2 of EPIP-AD-07 with Pager Access Code "9233." Then **GO TO step 5.1.6.**
 - a. IF assembly **IS NOT** required, read aloud two (2) times over the Gai-tronics the message below.

"Attention all personnel. We are experiencing an Unusual Event. Designated emergency response directors should report to their duty locations. No additional response is required at this time."

Choose (1) or (2)

- (1) No personnel protective actions are required at this time.
- (2) Personnel should avoid the following plant areas because of _____ (type hazard):
 - _____ (plant area)
 - _____ (plant area)
 - _____ (plant area)

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b. IF assembly IS required, THEN:

- Sound the plant siren.
- Read aloud two (2) times on the Gai-tronics the message below.

“Attention all personnel. We are experiencing an Unusual Event. Designated emergency response directors should report to their duty locations. All other personnel should report to the nearest assembly area.”

Choose (1) or (2)

- (1) No additional personnel protective actions are required at this time.
- (2) Personnel should avoid the following plant areas because
of _____ (type hazard):
_____ (plant area)
_____ (plant area)
_____ (plant area)

5.1.6 Contact the Security Shift Captain/Site Protection Director.

- a. IF personnel assembly has been initiated, THEN verify that “Personnel Assembly and Accountability,” EPIP-SEC-03 is initiated.
- b. Describe briefly the emergency event.

Note

No protective actions are required for an Unusual Event.

5.1.7 Complete the “Event Notice,” Form EPIP-AD-07-01.

- a. WHEN completing Box #7, get the downwind sector by using the guide on the back of the form.
- b. WHEN completing Part #9, check the following item:
- (A) None

Note

IF there is more than one Notifier and Control Room Communicator, THEN steps 5.1.8 and 5.1.10 should be done in parallel.

5.1.8 Direct the Notifier/Communicator to initiate notifications per EPIP-AD-07 using the “Event Notice,” Form EPIP-AD-07-01, completed in step 5.1.7.

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- 5.1.9 IF the event notification is a combination declaration and termination (quick in and out event), THEN determine the need to activate ERO radio pagers.
- 5.1.10 If appropriate, direct the Notifier/Communicator to activate pagers for Primary Directors and selected support personnel (group codes 9211 and 9222) in accordance with EPIP-AD-07 step 5.5. (See "Response Personnel Call List," EPIP-APPX-A-02 for individual pager codes).
- 5.1.11 Direct the STA to notify the NRC in accordance with step 5.5.3 of this procedure.
- 5.1.12 Review "State Call-Back – Question Guideline," Form EPIPF-AD-07-02, to prepare for questions which are most likely to be asked by State Duty Officer or State Radiological Coordinator.
- 5.1.13 Log all significant events and actions.
- 5.1.14 Update facility directors as needed.
- 5.1.15 UNTIL relieved by a designated ED, continue to make assessments of plant conditions and perform the required actions of the ED (Section 5.2 of this procedure). **GO TO step 5.2.5.**
- 5.2 Emergency Director (Designated) shall:
- 5.2.1 WHEN notified that an Emergency has been declared:
- Report to the Control Room.
 - IF an Emergency Director **HAS** been designated, UNTIL released, THEN assist the designated Emergency Director.
 - IF an Emergency Director **HAS NOT** been designated, THEN notify the Shift Manager of your intent to assume the responsibilities of the Emergency Director and continue implementation of this procedure.
- 5.2.2 WHEN appropriate, accept a briefing from the Shift Manager and STA. Key points listed below:
- _____ Classification chart used to determine emergency level.
 - _____ Protective Action Recommendation in effect.
 - _____ Status of off-site and KNPP notifications.
 - _____ Status of plant accountability.
 - _____ Status of plant operation.
 - _____ Control Room support priorities.
- 5.2.3 Notify other directors and Control Room staff of the transfer of the ED responsibility to you and your location.

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- 5.2.4 IF appropriate, THEN relocate to the Technical Support Center (TSC).
- 5.2.5 Ensure the overall emergency level is continually reviewed.
- _____ Event Classification (EPIP-AD-02)
 - _____ PAR (EPIP-AD-19)
 - _____ Emergency radiological exposures (EPIP-AD-11)
- 5.2.6 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.2.7.**
- 5.2.7 Determine the response status with an information gathering briefing. Include the following emergency response organization directors.
- _____ Event Operations Director (EOD):
 - Off-Site Notifications (EPIP-AD-07)
 - Plant Operations Status
 - Control Room support priorities
 - _____ Radiological Protection Director (RPD):
 - Status of Radiological Effluent Releases (potential off-site dose consequences)
 - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure)
 - Status of Personal Injuries or Vehicle Accidents
 - _____ Technical Support Center Director (TSCD):
 - Significant Plant Trends
 - Emergency Response Status
 - _____ Support Activities Director (SAD):
 - Maintenance Activities
 - Search and Rescue (EPIP-OSF-04)
 - Maintenance Support Requirements
 - _____ Site Protection Director (SPD):
 - Personnel Accountability (EPIP-SEC-03)
 - Significant Security Activities

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- 5.2.8 Determine priorities of major tasks required to minimize the impact on the public and mitigate the incident. Weigh activities in the following areas:
- Operations
 - Radiological
 - Technical Support
 - Maintenance
 - Security
- 5.2.9 Inform Emergency Response Manager (ERM) of plant conditions and priorities.
- 5.2.10 WHEN appropriate, brief the emergency directors on plant conditions and priorities.
- 5.2.11 IF the ERM has not assumed the responsibility, THEN provide Plant Emergency status updates to off-site authorities.
- a. IF off-site EOCs ARE activated, THEN use the Dial Select to contact off-site organizations.
 - b. IF off-site organization EOCs ARE NOT activated, WHEN those organizations initiate a request, provide status updates.
 - c. Use the "State Call-Back - Question Guideline," Form EPIPF-AD-07-02, or "Plant Emergency Status Report," Form EPIPF-EOF-08-05, and/or "Radiological Status Report," Form EPIPF-EOF-08-06, as information guides.
- 5.2.12 Review the need for any Emergency Director Assistants.
- 5.2.13 IF plant conditions indicate the need to activate the full emergency response organization, THEN:
- a. Notify all Directors of your decision to activate the full ERO.
 - b. Direct the Notifier or Control Room Communicator to activate pagers for all emergency response personnel (group code 9233) in accordance with EPIP-AD-07 step 5.5.
 - c. **GO TO EPIP-AD-04 step 5.2.4.**
- 5.2.14 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.2.15 Review the requirements of Section 5.1 of "Recovery Planning and Termination," EPIP-AD-15, and determine if recovery or termination activities can be implemented in accordance with EPIP-AD-15.
- 5.2.16 IF Final Conditions (Section 6.0) have NOT been met, THEN **GO TO step 5.2.5.**

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5.2.17 WHEN Final Conditions (Section 6.0) are met:

- a. Notify the Emergency Response Manager of the event termination or entry into recovery and the suspension of use of the EIPs.
- b. IF the event is an **ENTRY INTO RECOVERY**, THEN read aloud two (2) times on the Gai-tronics the message below.

“Attention all personnel. We have entered plant recovery operations. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as needed. Use of EIPs is suspended when all final actions have been completed to the satisfaction of the facility Director. The Recovery Manager is _____ and the Environmental Liaison is _____.”

- c. IF the event is an emergency class **TERMINATION**, THEN read aloud two (2) times on the Gai-tronics the message below.

“Attention all personnel. We have terminated the Emergency response. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as appropriate. Use of EIPs is suspended when all final actions have been completed to the satisfaction of the facility Director.”

- d. Ensure that termination or recovery notifications have been initiated by the NRC communicator.
- e. Verify that “Event Notice,” Form EIPF-AD-07-01, is being transmitted in accordance with EPIP-AD-07 or EPIP-EOF-08.
- f. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- g. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- h. Implement EPMP-02.01, “Declared Emergency Evaluation and Documentation.”

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5.3 The Notifier shall:

- 5.3.1 WHEN notified or upon hearing the Event announcement (except when a Security Event is in progress), report immediately to the SM in the Control Room.
- 5.3.2 WHEN directed by the Emergency Director/Shift Manager, perform event notifications. **GO TO EPIP-AD-07.**
- 5.3.3 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this Procedure and **GO TO EPIP-AD-04 step 5.3.2.**
- 5.3.4 IF a Control Room Communicator is not available, THEN assume the role of the Control Room Communicator and **GO TO step 5.4.4.**
- 5.3.5 UNTIL released, remain in the Control Room and help the designated Control Room Communicator.
- 5.3.6 WHEN released, report back to the Shift Captain.

5.4 Control Room Communicator shall:

- 5.4.1 WHEN directly notified, paged by radio-pager, or hearing the event announcement:
 - a. Report to the Control Room immediately.
 - b. IF a Control Room Communicator **HAS** been designated, UNTIL released, THEN assist the Control Room Communicator as instructed.
 - c. IF a Control Room Communicator **HAS NOT** been designated, THEN assume the responsibilities of the Control Room Communicator and continue to implement this procedure.
- 5.4.2 Notify the SM/ED of your arrival and assumption of the Control Room Communicator duties.
- 5.4.3 If applicable, obtain the status of notifications and verifications call backs from the Notifier.
- 5.4.4 IF there is an event **•DECLARATION, •TERMINATION, or •ENTRY INTO RECOVERY**, and directed by the SM/ED, THEN GO TO EPIP-AD-07 or EPIP-EOF-08 and make the appropriate event notifications.

Note

Off-Site and ERO communications must be completed before providing support for NRC communications.

- 5.4.5 IF requested by the STA, THEN provide communications support with the NRC.

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Note

IF there is an event escalation, THEN immediately return support for NRC communications back to the STA or the individual assigned by the SM/ED or EOD.

- 5.4.6 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.4.4.**
- 5.4.7 Review the need for the Notifier and assistant communicators support.
- 5.4.8 IF additional communicator support is needed, THEN contact the Technical Support Center Director.
- 5.4.9 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.4.10 Notify the EOD of any significant events.
- 5.4.11 IF Final Conditions (Section 6.0) have **NOT** been met, THEN **GO TO step 5.4.4.**
- 5.4.12 WHEN Final Conditions (Section 6.0) are met:
 - a. Ensure that termination or recovery communications have been completed in accordance with step 5.4.6.
 - b. Verify that the bell switch on the emergency government verification line is in the "ON" position.
 - c. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper places.
 - d. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.
- 5.5 Shift Technical Advisor shall:

Note

The Shift Technical Advisor shall be capable of responding to the Control Room within 10 minutes.

- 5.5.1 Report to the Control Room to be briefed on plant conditions.
- 5.5.2 Assist the Shift Manager in assessing plant conditions and determining emergency classification as defined in EPIP-AD-02, "Emergency Class Determination."

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Note

IF all off-site and ERO notifications are complete, THEN NRC notifications may be delegated to the Control Room Communicator.

5.5.3 Perform NRC Notification:

- a. Gather information needed to prepare the NRC "Event Notification Worksheet," Form GNP-11.04.04-1.

Note

If needed, the commercial telephone number is (301) 951-0550.

- b. Notify the NRC (Headquarters, Bethesda) as soon as possible, but not more than one hour after declaration of the Event, using the Emergency Notification System (ENS) phone with the red sticker.

Note

The NRC may request continuous communications per 10 CFR 50.72(c)(3). The STA must coordinate this activity with accident assessment until arrival of a Control Room Communicator.

- c. Provide the NRC with the necessary information from a completed Event Notification Worksheet.

5.5.4 WHEN the Control Room Communicator (CRCm) arrives and plant status and other activities are at a point that it is appropriate, turn NRC communications over to the CRCm by taking the following actions:

- a. Brief the CRCm on plant conditions, the status of NRC notification and updates.
- b. Inform the CRCm that you are turning over responsibility for NRC communications to them.

5.5.5 Support the Control Room staff with technical and analytical assistance in diagnosing abnormal events and to ensure adequate core cooling.

5.5.6 Monitor plant conditions and provide assistance as needed to the Shift Manager.

5.5.7 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.6.5.**

5.5.8 IF Final Conditions (Section 6.0) have **NOT** been met, THEN **GO TO step 5.5.5.**

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5.5.9 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

5.6 Event Operations Director (EOD) shall:

5.6.1 WHEN notified that an Emergency has been declared:

- a. Report to the Control Room.
- b. IF an Event Operations Director HAS been designated, UNTIL released, THEN assist the designated Event Operations Director.
- c. IF an Event Operations Director HAS NOT been designated, THEN notify the Shift Manager of your intent to assume the responsibilities of the Event Operations Director and continue implementation of this procedure.

5.6.2 Notify the SM/ED of your arrival and assumption of Event Operations Director responsibilities.

5.6.3 WHEN appropriate, accept a briefing from the Shift Manager and STA.

5.6.4 If required, verify Control Room personnel accountability is being maintained.

5.6.5 Review Control Room staffing requirements and:

- a. Direct the Notifier/Communicator to contact additional operations personnel as needed and request that they report to the site (See "Response Personnel Call List," EPIP-APPX-A-02 for names and numbers).
- b. Release any personnel not required.

5.6.6 Assess overall plant status.

- Verify equipment status and instrument indications.
- Verify Radiation monitors for abnormal indications.
- Review corrective actions that have been taken.

5.6.7 Make any recommendations to the Shift Manager as necessary.

5.6.8 Brief the Emergency Director of any changes on:

- Off-Site Notifications (EPIP-AD-07)
- Plant Operations Status
- Control Room support priorities

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- 5.6.9 Inform the RPD of any changes in radiological indications.
- 5.6.10 If required, request technical or maintenance support from the ED.
- 5.6.11 Prepare all work requests (WR) for approval.
- Review WR and designate retest requirements.
 - If required to do the job, determine and initiate system lineups and tagouts.
- 5.6.12 Brief the Control Room staff periodically on:
- Emergency response status
 - Priorities
 - Specific guidance and assignments
- 5.6.13 If appropriate, plan for shift relief per EPIP-AD-05.
- 5.6.14 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.7.5.**
- 5.6.15 IF Final Conditions (Section 6.0) have NOT been met, THEN GO TO step 5.6.4.
- 5.6.16 WHEN Final Conditions (Section 6.0) are met:
- Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
 - Collect all completed records and logs, as described procedure "Declared Emergency Evaluation and Documentation," EPMP-02.01.
 - Schedule a self critique with all event participants in the CR (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as guide.
- 5.7 Radiological Protection Director (RPD) shall:
- 5.7.1 WHEN notified that an Emergency has been declared:
- Report to the Radiation Protection Office (RPO).
 - IF a Radiation Protection Director HAS been designated, UNTIL released, THEN assist the designated RPD.
 - IF a Radiation Protection Director HAS NOT been designated, THEN assume the responsibilities of the RPD and continue implementing this procedure.

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- 5.7.2 Notify the ED/TSCD of your arrival in the RPO and assumption of RPD responsibilities.
- 5.7.3 If required, verify personnel accountability in RPO is being maintained.
- 5.7.4 If required, assist the SAD in search and rescue operations (EPIP-OSF-04).
- 5.7.5 Check radiological and meteorological information available in the TSC.
- 5.7.6 If needed, request additional Area and Process radiation monitor information from the Event Operations Director.
- 5.7.7 Verify that emergency radiation controls are being implemented (EPIP-AD-11).
- 5.7.8 If required, assist the SPD with Personnel Evacuation, (EPIP-SEC-05).

Note

Transportation of a contaminated injured person shall be to the Aurora Medical Center and a Radiation Technologist should be dispatched to the hospital.

Note

IF there is a question as to the extent of injuries, THEN it should be treated as a critical injury.

Note

Off-Site Support Agencies and their phone numbers are listed in "Off-Site Telephone Numbers," EPIP-APPX-A-03.

- 5.7.9 IF there are injuries or vehicle accidents associated with plant personnel or contractors, THEN contact the appropriate support.
 - a. IF the injury is a "Medical Attention (Critical) Injury," see NAD-02.09 for definition of critical injuries, a vehicle accident with injuries, THEN:
 - 1. Contact the County Sheriffs office with jurisdiction at the location of the injury(s). (Kewaunee County has jurisdiction on the KNPP site.)
 - Kewaunee County Dispatch - 911
 - Manitowoc County Dispatch - 920-683-4200
 - 2. Notify the dispatcher of the accident and/or injury and request a rescue squad (all critically injured personnel shall be transported by rescue squad).

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3. Provide the dispatcher with the following information:

- Your name, position, and return telephone number.
- The location of the accident and when it occurred.
- How many and how the injury(s) occurred.
- Nature and extent of injuries and condition of the patient(s).
- If any, extent of radioactive contamination and instructions that transportation of a potentially contaminated injured person shall be to the Aurora Medical Center.
- Plant name, location.
- If required, plant access instructions.

4. If the injury is on-site:

- Inform the SPD of your request for a rescue squad and its estimated time of arrival.
- Direct the SPD to have the vehicle driven to the proper plant entrance.

5. IF the accident potentially involves radioactive contamination, THEN:

- Dispatch a Radiation technologist to the accident site for contamination control.
- Dispatch a Radiation Technologist to the Aurora Medical Center to assist the hospital staff.

6. Insure that the requirements "Occupational Injuries or Vehicle Accidents During Operations," NAD-02.09, are implemented.

7. Inform the Emergency Director, Emergency Response Manager, and the Spokesperson of the accident and details of the injuries.

b. IF the Injury is a "Medical Attention (Non-critical) Injury," THEN:

Note

Any KNPP or contractor vehicle may be used for transport of (non-critical) injured personnel.

1. Arrange for transportation of the injured person.
2. Direct the SPD to have the vehicle driven to the proper plant entrance.

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3. Contact the hospital or clinic and provide the following information:
 - Your name, position, and return telephone number.
 - When, how many, and how the injury(s) occurred.
 - Nature of injuries and condition of the patient.
 - If any, extent of radioactive contamination.
 - Plant name, location, and access instructions.
 - Estimated time of arrival for the patient(s) at the hospital or clinic.
 4. IF there are contaminated injuries, THEN send a Radiation Technologist to the Aurora Medical Center to assist the hospital staff.
 5. Insure that the requirements "Occupational Injuries or Vehicle Accidents During Operations," NAD-02.09, are implemented.
 6. Inform the Emergency Director, Emergency Response Manager, and the Spokesperson of the accident and details of the injuries.
- 5.7.10 Brief the Emergency Director of plant radiological conditions.
- Status of Radiological Effluent Releases (potential off-site dose consequences).
 - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure).
 - Status of Personal Injuries or Vehicle Accidents.
- 5.7.11 Review the personnel requirements in the RPO/RAF and:
- a. As needed, contact Radiation Technologists to augment the on-shift personnel.
 - b. Release any RPO staff not required.
- 5.7.12 If appropriate, coordinate with the ALD to establish contract support for long term accident support.
- 5.7.13 If appropriate, relocate to the TSC.
- 5.7.14 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.7.15 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.8.5.**
- 5.7.16 IF Final Conditions (Section 6.0) have NOT been met, THEN **GO TO step 5.7.3.**

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5.7.17 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Verify all samples collected have been cataloged and appropriately stored.
- d. Schedule a self critique with all event participants in the RPO/RAF (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

5.8 Technical Support Center Director (TSCD) shall:

5.8.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Technical Support Center Director HAS been designated, UNTIL released, THEN assist the designated TSCD.
- c. IF a Technical Support Center Director HAS NOT been designated, THEN assume the responsibilities of the TSCD and continue implementing this procedure.

5.8.2 Notify the Emergency Director of your assumption of TSCD responsibilities.

5.8.3 Contact the Emergency Director and obtain information on plant status.

5.8.4 If required, verify accountability is being maintained in the TSC (EPIP-SEC-03).

5.8.5 Brief the Emergency Director on TSC activities:

- Significant Plant Trends
- Emergency Response Status

5.8.6 Ensure the TSC staff is informed of plant status and ED priorities.

5.8.7 Review TSC staffing requirements.

5.8.8 If appropriate, plan for a shift relief, per EPIP-AD-05.

5.8.9 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.9.5.**

5.8.10 IF Final Conditions (Section 6.0) have NOT been met, THEN **GO TO step 5.8.4.**

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5.8.11 WHEN Final Conditions (Section 6.0) are met:

- a. Ensure TSC and OSF are deactivated per "Technical Support Center Activation," EPIP-TSC-02.
- b. Collect all records and logs as described in procedure "Declared Emergency Evaluation and Documentation," EPMP-02.01.
- c. Schedule a self critique with all event participants in the TSC (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

5.9 Support Activities Director (SAD) shall:

5.9.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Support Activities Director HAS been designated, UNTIL released, THEN assist the designated SAD.
- c. IF a Support Activities Director HAS NOT been designated, THEN assume the responsibilities of the SAD and continue implementing this procedure.

5.9.2 Notify the Emergency Director of your assumption of SAD responsibilities and obtain information on plant status and immediate actions.

5.9.3 If needed, direct search and rescue operations (EPIP-OSF-04).

5.9.4 Direct emergency maintenance activities in accordance with the priorities established by the Emergency Director.

5.9.5 Review the maintenance staffing requirements to mitigate the incident.

5.9.6 Brief the Emergency Director on OSF activities:

- Maintenance Activities
- Search and Rescue (EPIP-OSF-04)
- Maintenance Support Requirements

5.9.7 If appropriate, plan for a shift relief per EPIP-AD-05.

5.9.8 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.10.6.**

5.9.9 IF Final Conditions (Section 6.0) have NOT been met, THEN **GO TO step 5.9.3.**

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5.9.10 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in the OSF (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

5.10 Site Protection Director (SPD) shall:

5.10.1 WHEN notified that an Emergency has been declared:

- a. Report to the Security Building.
- b. IF a Site Protection Director HAS been designated, UNTIL released, THEN assist the designated SPD.
- c. IF a Site Protection Director HAS NOT been designated, THEN assume the responsibilities of the SPD and continue implementing this procedure.

5.10.2 Notify the ED/TSCD of your arrival in the Security Building and assumption of the SPD responsibility.

5.10.3 Direct the implementation "Security Force Response to Emergencies," EPIP-SEC-02.

5.10.4 If required, establish "Personnel Assembly and Accountability," EPIP-SEC-03.

5.10.5 IF Search and Rescue is required due to accountability results, THEN notify the Support Activities Director.

5.10.6 If appropriate, relocate to the TSC.

5.10.7 Obtain information from the RPD or the Control Room concerning fire, chemical, or radiological hazards present within the protected area.

5.10.8 IF hazards identified by the RPD or the Control Room warrant it, THEN restrict personnel movement.

5.10.9 IF directed by the ED, THEN initiate a plant evacuation (EPIP-SEC-05).

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5.10.10 Brief the Emergency Director on security activities:

- Removal of visitors from site (i.e., fishermen) (EPIP-SEC-02)
- Personnel Accountability (EPIP-SEC-03)
- Access Control
- Significant Security Activities

5.10.11 Ensure that the Security Force and staff are informed of any significant issues relative to their activities.

5.10.12 If required, ensure accountability is maintained (EPIP-SEC-03).

5.10.13 Review security staffing requirements and make appropriate adjustments.

5.10.14 If appropriate, plan for a shift relief per EPIP-AD-05.

5.10.15 IF plant conditions degrade to where the declaration of a higher emergency level (escalation) is warranted, THEN suspend further use of this procedure and **GO TO EPIP-AD-04 step 5.11.7.**

5.10.16 IF Final Conditions (Section 6.0) are **NOT** met, THEN **GO TO step 5.10.7.**

5.10.17 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to there proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in Security (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

6.0 Final Conditions

- 6.1 Plant Emergency has been Terminated or Recovery actions have begun and the responsible director has suspended the use of EPIPs.

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7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 COMTRAK 87-152, Downgrading of EALs
- 7.3 COMTRAK 88-068, Calling in Additional Communicators as Required
- 7.4 NRC Inspection Report K-87-195, same as step 7.2
- 7.5 10CFR50.72(c)(3), Maintaining Open Communications with the NRC
- 7.6 NAD-02.09, Occupational Injuries or Vehicle Accidents
- 7.7 EPIP-AD-02, Emergency Class Determination
- 7.8 EPIP-AD-04, KNPP Response to an Alert or Higher
- 7.9 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.10 EPIP-AD-07, Initial Emergency Notifications
- 7.11 EPIP-AD-11, Emergency Radiation Controls
- 7.12 EPIP-AD-15, Recovery Planning and Termination
- 7.13 EPIP-AD-19, Protective Action Guidelines
- 7.14 EPIP-EOF-08, Continuing Emergency Notifications
- 7.15 EPIP-OSF-04, Search and Rescue
- 7.16 EPIP-SEC-02, Security Force Response to Emergencies
- 7.17 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.18 EPIP-SEC-05, Personnel Evacuation
- 7.19 EPIP-APPX-A-02, Response Personnel Call List
- 7.20 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.21 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.22 Form GNP-11.04.04-1, Event Notification Worksheet

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7.23 Form EPIPF-AD-07-01, Event Notice

7.24 Form EPIPF-AD-07-02, State Call-Back - Question Guideline

8.0 Records

8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

- Event Notice, Form EPIPF-AD-07-01
- Event Notification Worksheet, Form GNP-11.04.04-1

8.1.2 Non-QA Records

None

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Reviewed By <i>[Signature]</i>		Approved By <i>[Signature]</i>				
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

1.0 Purpose

- 1.1 This procedure provides guidance to the Shift Manager/Emergency Director and other initial response personnel for an appropriate response to an **Alert, Site Emergency, or General Emergency**.

2.0 General Notes

- 2.1 The **Shift Manager (SM) is the initial Emergency Director (ED)** in all situations. Any transfer of this responsibility shall be documented in the Shift Manager's log and communicated to all on-site directors.
- 2.2 As more information becomes available, initial protective action recommendations should be adjusted in accordance with plant conditions, dose projections, time available to evacuate, estimated evacuation times, and meteorological conditions (EPIP-AD-19).
- 2.3 IF notified by radio-pager and the message is not understood, THEN emergency response personnel should confirm contact by telephoning Meridian Mail at 1-800-236-1588. A Meridian Mail voice message will indicate that the radio-pager activation was for an **actual** declared emergency and **not** a drill or exercise.
- 2.4 IF approached by the media during a declared emergency, THEN refer them to the Joint Public Information Center (JPIC) at 920-433-1400 or 1-800-838-6192 and tell them that this is their most accurate source for information.

3.0 Precautions and Limitations

- 3.1 "Event Notice," Form EPIPF-AD-07-01, should be initiated and in progress to state and local emergency governments within 15 minutes of the emergency level being declared, or as soon as possible without further compromise to plant or public safety.
- 3.2 The SM should remain in the Control Room during a declared emergency.
- 3.3 The following responsibilities of the ED shall not be delegated.
- 3.3.1 Determination of emergency classification (EPIP-AD-02).
- 3.3.2 Authorization of emergency exposures in excess of 10 CFR Part 20 limits (EPIP-AD-11).

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3.3.3 UNTIL the Emergency Response Manager assumes the responsibility following EOF activation, recommendations of protective actions to off-site authorities (EPIP-AD-19).

3.4 The ED should carefully consider the status of activities (especially those identified in step 3.3 above) before relocating to the TSC. Relocation to the TSC prior to TSC activation is not recommended.

4.0 Initial Conditions

4.1 This procedure shall be implemented upon declaration of an **Alert, Site Emergency, General Emergency**, or when directed by the Shift Manager or Emergency Director.

5.0 Procedure

5.1 SM/ED shall take the following Initial Actions:

5.1.1 Contact the Shift Technical Advisor (STA) and direct them to report to the Control Room.

5.1.2 IF the event can be declared and terminated within one notification, THEN the SM/ED has the option to require assembly based on the nature of the event and their judgement of threat to plant staff safety. In case assembly is not warranted, **GO TO step 5.1.4.**

5.1.3 IF assembly could present an unacceptable risk to plant employees as a result of a security event, THEN DO NOT initiate assembly. **GO TO step 5.1.5** (Ref: Operations Procedure E-0-08).

5.1.4 Initiate personnel assembly.

a. IF the plant Gai-tronics system is not available, THEN instruct the Notifier/Communicator to immediately perform step 5.5.2 of EPIP-AD-07 with Pager Access Code "9233," **GO TO step 5.1.5.**

b. Sound the plant siren.

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- c. Read aloud two (2) times on the Gai-tronics the message below.

“Attention all personnel. We are experiencing an (Choose One) (Alert/Site Emergency/General Emergency). Emergency response organization personnel should report to their duty locations. All other personnel should report to the nearest assembly area.”

Choose (1) or (2)

- (1) No additional personnel protective actions are required at this time.
- (2) Personnel should avoid the following plant areas because
of _____ (type hazard):
_____ (plant area)
_____ (plant area)
_____ (plant area)

5.1.5 Contact the Security Shift Captain/Site Protection Director.

- a. Verify “Security Force Response to Emergency,” EPIP-SEC-02, actions are being implemented for an Alert or Higher.
 - Verify on-site members of the general public are directed to leave the site in accordance with EPIP-SEC-02.
 - Verify control measures for site access/egress are established in accordance with EPIP-SEC-02.
- b. IF personnel assembly has been initiated, THEN verify that “Personnel Assembly and Accountability,” EPIP-SEC-03, is initiated.
- c. Describe briefly the emergency event.

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Note

Protective actions for the public are required for a General Emergency only.

- 5.1.6 Complete the "Event Notice," Form EPIP-AD-07-01.

Note

Unstable meteorology exists if:

1. The 10 and 60 meter wind speed is less than 5 mph, AND
 2. Delta T is less than -1.53°F or Sigma Theta is greater than 17.5°F .
- a. WHEN completing Box #7, get the downwind sector by using the guide on the back of the form. IF unstable meteorology exists, THEN enter N/A in Box #7 and explain in Box #10.
 - b. IF the event is a General Emergency and unstable meteorology exists, WHEN completing Part #9, check the following item:
 - (C) 0-5 mile radius.
 - c. IF the event is a General Emergency and adverse meteorology DOES NOT exist, WHEN completing Part #9, check the following items:
 - (B) 0-2 mile radius.

Note

The three sectors in (D), include the downwind sector from Part #7 and one sector either side.

- (D) 2-5 miles in sectors _____, _____, _____.
- d. IF the event is an Alert or Site Emergency, WHEN completing Part #9, check the following item:
 - (A) None

Note

IF there is more than one Notifier and Control Room Communicator, THEN steps 5.1.7 and 5.1.9 should be done in parallel.

- 5.1.7 Direct the Notifier/Communicator to initiate notifications per EPIP-AD-07 using the "Event Notice," Form EPIP-AD-07-01, completed in step 5.1.6.
- 5.1.8 IF the event notification is a combination declaration and termination (quick in and out event), THEN determine the need to activate ERO radio pagers.
- 5.1.9 If appropriate, direct the Notifier/Communicator to activate pagers for all emergency response personnel (group code 9233) in accordance with EPIP-AD-07 step 5.5. (See "Response Personnel Call List," EPIP-APPX-A-02 for individual pager codes.)

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- 5.1.10 Direct the STA to notify the NRC in accordance with step 5.6.3 of this procedure.
- 5.1.11 Review "State Call-Back - Question Guideline," Form EIPF-AD-07-02, to prepare for questions which are most likely to be asked by State Duty Officer or State Radiological Coordinator.
- 5.1.12 Log all significant events and actions.
- 5.1.13 Verify Control Room Ventilation System operation.
- 5.1.14 Report any increase in Control Room radiation to the Radiological Protection Director (RPD) for habitability assessment.
- 5.1.15 Request support from Technical Support Center (TSC) or OSF staff as needed.
- 5.1.16 Update facility directors as needed.
- 5.1.17 UNTIL relieved by a designated ED, continue to make assessments of plant conditions and perform the required actions of the ED (Section 5.2 of this procedure)
GO TO step 5.2.6.

5.2 Emergency Director (Designated) shall:

- 5.2.1 WHEN notified that an Emergency has been declared:
 - a. Report to the Control Room.
 - b. IF an Emergency Director HAS been designated, UNTIL released, THEN:
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated Emergency Director.
 - c. IF an Emergency Director HAS NOT been designated, THEN notify the Shift Manager of your intent to assume the responsibilities of the Emergency Director and continue implementation of this procedure.
- 5.2.2 WHEN appropriate, accept a briefing from the Shift Manager and STA. Key points listed below:
 - a. _____ Classification chart used to determine emergency level.
 - b. _____ Protective Action Recommendation in effect.
 - c. _____ Status of off-site and KNPP notifications.
 - d. _____ Status of plant accountability.
 - e. _____ Status of plant operation.
 - f. _____ Control Room support priorities.

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- 5.2.3 Notify other directors and Control Room staff of the transfer of the ED responsibility to you and your location.
- 5.2.4 WHEN appropriate, relocate to the Technical Support Center (TSC).
- 5.2.5 Brief the TSC staff on the plant conditions.
- 5.2.6 Ensure the overall emergency level is continually reviewed.
- _____ Event Classification (EPIP-AD-02)
 - _____ PAR (EPIP-AD-19)
 - _____ Emergency Radiological Exposures (EPIP-AD-11)

Warning

It is not required to de-escalate from an Emergency Action Level, termination or direct entry into recovery is preferable. However, there may be occasions when it is more appropriate to de-escalate.

EPIP-AD-02 and other EPIPs are not written to facilitate de-escalation. Therefore, any decision to de-escalate instead of entering recovery must be based on a thorough review of EPIP-AD-02 and careful use of appropriate procedures.

- 5.2.7 IF plant conditions have met the conditions for escalating or de-escalating the emergency classification (EPIP-AD-02), set the time and emergency level being declared, THEN:
- IF assembly could present an unacceptable risk to plant employees as a result of a Security Event, DO NOT INITIATE assembly.
GO TO step 5.2.7(d).

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b. IF it **HAS NOT** already been completed, THEN:

1. Direct a Control Room staff member to sound the plant siren.
2. WHEN the plant siren has been sounded, read aloud two (2) times on the Gai-tronics the message below:

“Attention all personnel. We have (Choose One) escalated/de-escalated from (Choose One) (Unusual Event/Alert/Site Emergency/General Emergency) to (Choose One) ((Unusual Event/Alert/Site Emergency/General Emergency). Designated emergency response directors should take appropriate action.

Emergency Personnel shall report to their emergency duty station. All other personnel should report to the nearest assembly area.”

Choose (1) or (2)

- (1) No additional personnel protective actions are required at this time.
- (2) Personnel should avoid the following plant areas because of _____ (type hazard):
_____ (plant area)
_____ (plant area)
_____ (plant area)

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c. IF personnel assembly **HAS** been completed, THEN:

1. Direct a Control Room staff member to sound the plant siren.
2. When the plant siren has been sounded, read aloud two (2) times on the Gai-tronics the message below:

“Attention all personnel. We have (Choose One) escalated/de-escalated from (Choose One) (Unusual Event/Alert/Site Emergency/General Emergency) to (Choose One) (Unusual Event/Alert/Site Emergency/General Emergency). Designated emergency response directors should take appropriate action.”

Choose (1) or (2)

- (1) No additional personnel protective actions are required at this time.
- (2) Personnel should avoid the following plant areas because of _____ (type hazard):
_____ (plant area)
_____ (plant area)
_____ (plant area)

d. IF the EOF **HAS NOT** accepted responsibility for off-site notifications and PARs, THEN:

Note

Protective actions for the public are required for a General Emergency only.

1. Review current and potential protective action recommendations (EPIP-AD-19).
2. IF time permits, THEN contact off-site authorities via the Dial-Select to discuss pending changes in classification and/or appropriate PAR.
3. Initiate revised event classifications and/or PAR on “Event Notice,” Form EPIPF-AD-07-01.
4. Review and sign all “Event Notice,” Form EPIPF-AD-07-01, that are generated from the CR/TSC.
5. Forward approved “Event Notice,” Form EPIPF-AD-07-01, to the EOF Communicator for transmission to off-site agencies.
6. Verify that required notifications are made (EPIP-AD-07 or EPIP-EOF-08).

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- e. IF the EOF **HAS** taken responsibility for off-site notifications and PARs, THEN ensure the ERM is notified of the emergency level escalation and the time it was declared.
- f. Direct the Shift Technical Advisor to notify the NRC in accordance with step 5.3.3 of this procedure.

5.2.8 Determine the response status with an information collection brief. Include the following emergency response organization Directors:

- a. _____ Event Operations Director (EOD):
 - Off-site Notifications (EPIP-AD-07)
 - Plant Operations Status
 - Control Room support priorities
- b. _____ Radiological Protection Director (RPD):
 - Status of Radiological Effluent Releases (potential off-site dose consequences)
 - Off-site Dose Assessment Evaluation
 - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure)
 - Status of Personal Injuries or Vehicle Accidents
 - Availability of Potassium Iodide (EPIP-AD-18)
- c. _____ Technical Support Center Director (TSCD):
 - TSC Activation and Operational Status (EPIP-TSC-02)
 - Significant Plant Trends
 - Core Damage Assessment (EPIP-TSC-09A)
- d. _____ Support Activities Director (SAD):
 - OSF Activation and operational status
 - OSF Facility Operations (EPIP-OSF-02)
 - Maintenance Activities
 - Search and Rescue (EPIP-OSF-04)

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e. _____ Site Protection Director (SPD):

- Removal of Visitors from site (i.e., fishermen) (EPIP-SEC-02)
- Personnel Accountability (EPIP-SEC-03)
- Access Control
- Significant Security Activities

f. _____ Severe Accident Management Team Leader (SAMTL):

- SAM Team Status
- Severe Challenge Status
- Strategies Implemented
- Strategies being Evaluated
- New Strategy Recommendations

5.2.9 Determine priorities of major tasks required to minimize the impact on the public and mitigate the incident. Weigh activities in the following areas:

- Operations
- Radiological
- Technical Support
- Maintenance
- Security

5.2.10 Inform Emergency Response Manager (ERM) of:

- Status of the plant.
- On-site or off-site radiological releases or potential releases.
- Priorities of tasks to minimize the impact to the public.
- Incidents of public interest (i.e., fires, spills, personnel contaminations, and personnel injuries).

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- 5.2.11 WHEN appropriate, brief the Plant Emergency Response Organization on plant conditions and priorities. Give specific guidance and assignments considering the following:
- If required, direct evacuation of non-essential personnel from the plant.
 - Direct the SPD to initiate a plant evacuation.
 - Direct the RPD to assist the SPD in the plant evacuation.
 - Contact the Manitowoc and Kewaunee County Emergency Directors and the ERM to coordinate the evacuation (may use Dial Select).
 - The SPD implements and coordinates instructions.
 - Update the Manitowoc and Kewaunee County Emergency Directors and the ERM on the status of the evacuation (may use Dial Select).
 - If appropriate, instruct the data coordinator to initiate plant parameter trends on the following:
 - Safety Assessment System
 - Digital Display (#3)
 - Honeywell Trend Recorders
- 5.2.12 IF the ERM **HAS NOT** assumed the responsibility, THEN provide Plant Emergency status updates to off-site authorities.
- IF off-site EOCs **ARE** activated, THEN use the Dial Select to contact off-site organizations.
 - IF off-site organization EOCs **ARE NOT** activated, WHEN those organizations initiate a request, provide status updates.
 - Use the "State Call-Back - Question Guideline," Form EIPF-AD-07-02, or "Plant Emergency Status Report," Form EIPF-EOF-08-05, and/or "Radiological Status Report," Form EIPF-EOF-08-06, as information guides.
- 5.2.13 Review the plant Emergency Response Staffing requirements and need for any Emergency Director Assistants.
- 5.2.14 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.2.15 Review the requirements of Section 5.1 of EPIP-AD-15, "Recovery Planning and Termination," and determine if recovery or termination activities can be implemented.
- 5.2.16 IF Final Conditions (Section 6.0) have **NOT** been met, THEN GO TO step 5.2.6.

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5.2.17 WHEN Final Conditions (Section 6.0) are met:

- a. Notify the Emergency Response Manager of the event termination or entry into recovery and the suspension of the use of the use of EIPs.
- b. IF the event is an **ENTRY INTO RECOVERY**; read aloud two (2) times on the Gai-tronics the message below:

“Attention all personnel. We have entered plant recovery operations. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as appropriate. Use of EIPs is suspended when all final actions have been completed to the satisfaction of the facility Director. The Recovery Manager is _____ and the Environmental Liaison is _____.”

- c. IF the event is an emergency class **TERMINATION**, THEN read aloud two (2) times on the Gai-tronics the message below:

“Attention all personnel. We have terminated the Emergency response. Review final conditions of all procedures and restore all emergency response materials and equipment to their proper location. Appropriate inventories should be performed and supplies replenished as appropriate.”

- d. Ensure that termination or recovery notifications have been initiated by the NRC communicator.
- e. Verify that “Event Notice,” Form EPIPF-AD-07-01, is being transmitted accordance with EPIP-AD-07 or EPIP-EOF-08.
- f. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to there proper place.
- g. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- h. Implement EPMP-02.01, “Declared Emergency Evaluation and Documentation.”

5.3 The Notifier shall:

- 5.3.1 WHEN notified or upon hearing the Event announcement (except when a Security Event is in progress), report immediately to the SM in the Control Room.

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- 5.3.2 WHEN directed by the Emergency Director/Shift Manager, perform event notifications, **GO TO EPIP-AD-07**.
- 5.3.3 IF a Control Room Communicator is not available, THEN assume the role of the Control Room Communicator and **GO TO step 5.4.4**.
- 5.3.4 UNTIL released, remain in the Control Room and help the designated Control Room Communicator.
- 5.3.5 WHEN released, report back to the Shift Captain.
- 5.4 Control Room Communicator shall:
- 5.4.1 WHEN directly notified, paged by radio-pager, or hearing the event announcement:
- Report to the Control Room immediately.
 - IF the Control Room Communicator **HAS** been designated, UNTIL released, THEN assist the designated Control Room Communicator.
 - IF a Control Room Communicator **HAS NOT** been designated, THEN assume the responsibilities of the Control Room Communicator and continue to implement this procedure.
- 5.4.2 Notify the SM/ED of your arrival and assumption of the Control Room Communicator duties.
- 5.4.3 If applicable, obtain the status of notifications and verification call backs from the Notifier.
- 5.4.4 IF there is an event • **DECLARATION**, • **ESCALATION**, • **DE-ESCALATION**, • **CHANGE IN PAR**, • **TERMINATION**, or • **ENTRY INTO RECOVERY**, AND directed by the SM/ED, **GO TO EPIP-AD-07** or **EPIP-EOF-08** and make the appropriate event notifications.
- 5.4.5 Review the need for the Notifier and assistant communicators support.
- 5.4.6 IF additional Communicator support is needed, THEN contact the Technical Support Center Director
- 5.4.7 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.4.8 Notify the EOD of any significant events.
- 5.4.9 IF Final Conditions (Section 6.0) have **NOT** been met, THEN **GO TO step 5.4.4**.

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5.4.10 WHEN Final Conditions (Section 6.0) are met:

- a. Ensure that termination or recovery communications have been completed in accordance with step 5.3.6.
- b. Verify that the bell switch on the emergency government verification line is in the "ON" position.
- c. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- d. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

5.5 The Control Room Support Person (SP-C) shall:

5.5.1 WHEN directly notified, paged by radio-pager, or hearing the event announcement:

- a. Report to the Control Room immediately.
- b. IF a Control Room Support Person HAS been designated, UNTIL released, THEN assist the Control Room Support Person as instructed.
- c. IF a Control Room Support Person HAS NOT been designated, THEN assume the responsibilities of the Control Room Support Person and continue to implement this procedure.

5.5.2 Initiate or maintain accountability in the Control Room (EPIP-SEC-03).

5.5.3 Support the control room staff with:

- a. Chronological log of events
- b. Copying
- c. Answering telephones

5.5.4 Review the need for additional Control Room Support Personnel.

5.5.5 IF additional Support Personnel are needed, THEN notify the EOD.

5.5.6 If appropriate, plan for a shift relief per EPIP-AD-05.

5.5.7 Notify the EOD of any significant issues.

5.5.8 IF Final Conditions (Section 6.0) have NOT been met, THEN GO TO step 5.5.2.

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5.5.9 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.

5.6 Shift Technical Advisor shall:

Note

The Shift Technical Advisor shall be capable of responding to the Control Room within 10 minutes.

5.6.1 Report to the Control Room to be briefed on plant conditions.

5.6.2 Assist the Shift Manager in assessing plant conditions and determining emergency classification as defined in EPIP-AD-02, Emergency Class Determination.

Note

IF all off-site and ERO notifications are complete, THEN NRC notifications may be delegated to the Control Room Communicator (CRCm) and should be turned over to the NRC Communicator (NRCCm) as soon as practical.

5.6.3 Perform NRC Notification:

- a. Gather information needed to prepare the NRC "Event Notification Worksheet," Form GNP-11.04.04-1.

Note

If needed, the commercial telephone number is (301) 951-0550.

- b. Notify the NRC (Headquarters, Bethesda) as soon as possible, but not more than one hour after declaration of the Event, using the Emergency Notification System (ENS) phone with the red sticker.

Note

The NRC may request continuous communications per 10 CFR 50.72(c)(3). The STA must coordinate this activity with accident assessment until arrival of a Control Room Communicator, NRC Communicator, or activation of the TSC allows them to assume this activity.

- c. Provide the NRC with the necessary information from a completed Event Notification Worksheet.

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- 5.6.4 WHEN the Control Room Communicator (CRCm), or NRC Communicator arrives, or the TSC accepts responsibility for NRC communications and plant status and other activities are at a point that it is appropriate, turn NRC communications over by taking the following actions:
- Brief on plant conditions, the status of NRC notification and updates.
 - Inform them that you are turning over responsibility for NRC communications to them.
- 5.6.5 Support the Control Room staff with technical and analytical assistance in diagnosing abnormal events and to ensure adequate core cooling.
- 5.6.6 Monitor plant conditions and provide assistance as needed to the Shift Manager.
- 5.6.7 IF Final Conditions (Section 6.0) have NOT been met, THEN GO TO step 5.6.5.
- 5.6.8 WHEN Final Conditions (Section 6.0) are met:
- Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
 - Collect all completed records, logs, forms, notes, and other documentation and give them to the EOD.
- 5.7 Event Operations Director (EOD) shall:
- 5.7.1 WHEN notified that an Emergency has been declared:
- Report to the Control Room.
 - IF an Event Operations Director HAS been designated, UNTIL released, THEN
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated Event Operations Director.
 - IF an Event Operations Director HAS NOT been designated, THEN assume the responsibilities of the Event Operations Director and continue implementation of this procedure.
- 5.7.2 Notify the SM/ED of your arrival and assumption of Event Operations Director responsibilities.
- 5.7.3 WHEN they are activating, verify DAROME communication links with TSC and EOF.
- 5.7.4 WHEN appropriate, accept a briefing from the Shift Manager and STA.
- 5.7.5 Verify Control Room personnel accountability is being maintained.

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5.7.6 Review Control Room staffing requirements and:

- a. Direct the Notifier/Communicator to contact additional operations personnel as needed and request that they report to the site (See "Response Personnel Call List," EPIP-APPX-A-02 for names and numbers).
- b. Release any personnel not required.

5.7.7 Assess overall plant status.

- Verify equipment status and instrument indications.
- Verify Radiation monitors for abnormal indications.
- Review corrective actions that have been taken.

5.7.8 As necessary, make any recommendations to the Shift Manager.

5.7.9 Brief the Emergency Director of any changes on:

- Off-site Notifications (EPIP-AD-07 or EPIP-EOF-08)
- Plant Operations Status
- Control Room support priorities

5.7.10 Inform the RPD of any changes in radiological indications.

5.7.11 If required, request technical or maintenance support from the ED.

5.7.12 Prepare all work requests (WR) for approval.

- a. Review WR and designate retest requirements.
- b. IF required to do the job, THEN determine and initiate system lineups and tagouts.

5.7.13 Brief the Control Room staff periodically on:

- Emergency response status
- Priorities
- Specific guidance and assignments

5.7.14 If appropriate, plan for shift relief per EPIP-AD-05.

5.7.15 IF Final Conditions (Section 6.0) have NOT been met, THEN GO TO step 5.7.5.

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5.7.16 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records and logs, as described in procedure "Declared Emergency Evaluation and Documentation," EPMP-02.01.
- c. Schedule a self critique with all event participants in the CR (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

5.8 Radiological Protection Director (RPD) shall:

5.8.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Radiation Protection Director HAS been designated, UNTIL released, THEN:
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated RPD.
- c. IF a Radiation Protection Director HAS NOT been designated, THEN assume the responsibilities of the RPD and continue implementing this procedure.

5.8.2 Notify the ED/TSCD of your arrival in the TSC and assumption of RPD responsibilities.

5.8.3 Direct the staff to activate the RPO/RAF (EPIP-RET-02A).

5.8.4 Direct staff to establish Radiation Emergency Team organization (EPIP-RET-02).

5.8.5 If required, verify personnel accountability in RPO is being maintained.

5.8.6 If required, assist the SAD in search and rescue operations (EPIP-OSF-04).

5.8.7 Check radiological and meteorological information available in the TSC.

5.8.8 If needed, contact the Data Coordinator or Operations Communicator for additional Area and Process radiation monitor information.

5.8.9 Verify that emergency radiation controls are being implemented (EPIP-AD-11).

5.8.10 Verify controlled area access is being maintained (EPIP-RET-02D).

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- 5.8.11 As dictated by the emergency event, direct the staff to implement additional In-Plant Radiation Emergency Team (IRET), Chemistry Emergency Team (CET), and Site Radiation Emergency Team (SRET) procedures.
- Gaseous Effluent Sample and Analysis, EPIP-RET-02B
 - Containment Air Sampling and Analysis, EPIP-RET-02C
 - Liquid Effluent Release Paths, EPIP-RET-03A
 - Post-Accident Operation of the High Radiation Sample Room, EPIP-RET-03C
 - Containment Air Sampling Analysis Using CASP, EPIP-RET-03D
 - SBF Operation/Relocation, EPIP-RET-04A
 - Site Boundary Dose Rates During Controlled Plant Cooldown, EPIP-RET-05
 - Contamination Control of the Aurora Medical Center, EPIP-RET-08
 - Post-Accident Population Dose, EPIP-RET-09
- 5.8.12 IF dose calculation capability is not available in the EOF **AND** a radioactive release has occurred or there is the potential for a release, THEN direct the staff to perform dose projections (EPIP-ENV-03C).
- 5.8.13 Monitor plant conditions for indications of radioactive iodine and with concurrence of the ED make KI available if appropriate (EPIP-AD-18).
- 5.8.14 If required, assist the SPD with Personnel Evacuation (EPIP-SEC-05).

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Note

Transportation of a contaminated injured person shall be to the Aurora Medical Center and an IRET should be dispatched to the hospital.

Note

IF there is a question as to the extent of injuries, THEN it should be treated as a critical injury.

Note

Off-Site Support Agencies and their phone numbers are listed in "Off-Site Telephone Numbers," EPIP-APPX-A-03.

5.8.15 IF there are injuries or vehicle accidents associated with plant personnel or contractors, THEN contact the appropriate support agencies.

a. IF the Injury is a "Medical Attention (Critical) Injury" or a vehicle accident with injuries (see NAD-02.09 for definition of critical injuries), THEN:

1. Contact the County Sheriffs office with jurisdiction at the location of the injury(s). (Kewaunee County has jurisdiction on the KNPP site.)
 - Kewaunee County Dispatch - 911
 - Manitowoc County Dispatch - (920) 683-4200
2. Notify the dispatcher of the accident and/or injury and request a rescue squad (all critically injured personnel shall be transported by rescue squad).
3. Provide the dispatcher with the following information:
 - Your name, position, and return telephone number.
 - The location of the accident and when it occurred.
 - How many and how the injury(s) occurred.
 - Nature and extent of injuries and condition of the patient(s).
 - If any, extent of radioactive contamination and instructions that transportation of a potentially contaminated injured person shall be to the Aurora Medical Center.
 - Plant name, location.
 - If required, plant access instructions.

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4. IF the injury is on-site, THEN:
 - Inform the SPD of your request for a rescue squad and its estimated time of arrival.
 - Direct the SPD to have the vehicle driven to the proper plant entrance.
5. IF the accident potentially involves radioactive contamination, THEN:
 - Dispatch an IRET member or SRET to the accident site for contamination control.
 - Dispatch an IRET member to the Aurora Medical Center to assist the hospital staff.
6. Insure that the requirements for "Occupational Injuries or Vehicle Accidents During Operations," NAD-02.09, are implemented.
7. Inform the Emergency Director, Emergency Response Manager, and the Spokesperson of the accident and details of the injuries.
- b. IF the Injury is a "Medical Attention (Non-critical) Injury," THEN:

Note

Any KNPP or contractor vehicle may be used for transport of (non-critical) injured personnel.

1. Arrange for transportation of the injured person.
2. Direct the SPD to have the vehicle driven to the proper plant entrance.
3. Contact the hospital or clinic and provide the following information:
 - Your name, position, and return telephone number.
 - When, how many, and how the injury(s) occurred.
 - Nature of injuries and condition of the patient.
 - If any, extent of radioactive contamination.
 - Plant name, location, and access instructions.
 - Estimated time of arrival for the patient(s) at the hospital or clinic.
4. IF there are contaminated injuries, THEN send an IRET member to the Aurora Medical Center to assist the hospital staff.
5. Insure that the requirements "Occupational Injuries or Vehicle Accidents During Operations," NAD-02.09, are implemented.
6. Inform the Emergency Director, Emergency Response Manager, and the Spokesperson of the accident and details of the injuries.

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5.8.16 Brief the Emergency Director of plant radiological conditions:

- Status of Radiological Effluent Releases (potential off-site dose consequences).
- Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure).
- Status of Personal Injuries or Vehicle Accidents.
- Availability of Potassium Iodide (EPIP-AD-18).

5.8.17 Review the personnel requirements in the RPO/RAF and:

- a. As needed, direct the staff to contact additional Radiation Emergency Team (RET) members.
- b. Release any RPO/RAF staff not required.

5.8.18 IF appropriate for long term accident support, THEN coordinate with the ALD to establish contract support.

5.8.19 If appropriate, plan for a shift relief per EPIP-AD-05.

5.8.20 IF Final Conditions (Section 6.0) have **NOT** been met, THEN GO TO step 5.8.5.

5.8.21 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Verify all samples collected have been cataloged and appropriately stored.
- d. Schedule a self critique with all event participants in the RPO/RAF (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

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5.9 Technical Support Center Director (TSCD) shall:

5.9.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Technical Support Center Director HAS been designated, UNTIL released, THEN:
 - Assist in the activation of the TSC per EPIP-TSC-02.
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated TSCD.
- c. IF a Technical Support Center Director HAS NOT been designated, THEN assume the responsibilities of the TSCD and continue implementing this procedure.

5.9.2 Notify the Emergency Director of your assumption of TSCD responsibilities.

5.9.3 Notify TSC staff of your assumption of TSCD responsibilities.

5.9.4 Verify that the TSC is being activated (EPIP-TSC-02).

5.9.5 Verify accountability is being maintained in the TSC (EPIP-SEC-03).

5.9.6 Determine the TSC activity status by obtaining the following information from TSC staff.

- a. _____ Operations Coordinator:
 - TSC support of control room activities
 - Technical support of IPEOPs (EPIP-TSC-10)
- b. _____ Engineering Coordinator:
 - Design change activities (EPIP-TSC-04)
 - Work requests (EPIP-OSF-03)
 - Support Activities
- c. _____ Core Hydraulics Coordinator:
 - Core Damage Assessment (EPIP-TSC-09A)
 - If appropriate, Steam Release Calculations (EPIP-TSC-08A)
 - If appropriate, Head Venting Calculations (EPIP-TSC-07)

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- d. _____ Quality Control Coordinator:
 - QC concerns
 - Warehouse activities
- e. _____ Data Coordinator:
 - Status of data collection and posting (EPIP-TSC-03)
 - Significant changes in plant parameters
- f. _____ Communicators
 - EOF, CR, JPIC Communication (3-Way Conference)
 - NRC communications
 - Emergency Response Data System
- 5.9.7 Contact the Emergency Director (ED) and obtain information on plant status.
- 5.9.8 Brief the Emergency Director on TSC activities.
 - TSC Activation and Operational Status (EPIP-TSC-02)
 - Significant Plant Trends
 - Core Damage Assessment (EPIP-TSC-09A)
- 5.9.9 Ensure the TSC staff is informed of plant status and ED priorities.
- 5.9.10 Review TSC staffing requirements.
- 5.9.11 If appropriate, plan for a shift relief per EPIP-AD-05.
- 5.9.12 IF Final Conditions (Section 6.0) have **NOT** been met, **THEN GO TO step 5.9.5.**
- 5.9.13 **WHEN** Final Conditions (Section 6.0) are met:
 - a. Ensure the TSC and OSF are de-activated per "Technical Support Center Activation," EPIP-TSC-02.
 - b. Collect all records and logs as described in procedure "Declared Emergency Evaluation and Documentation," EPMP-02.01.
 - c. Schedule a self critique with all event participants in the TSC (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

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5.10 Support Activities Director (SAD) shall:

5.10.1 WHEN notified that an Emergency has been declared:

- a. Report to the Technical Support Center (TSC).
- b. IF a Support Activities Director HAS been designated, UNTIL released, THEN:
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated SAD.
- c. IF a Support Activities Director HAS NOT been designated, THEN assume the responsibilities of the SAD and continue implementing this procedure.

5.10.2 Notify the Emergency Director of your assumption of SAD responsibilities.

5.10.3 Notify the OSF staff that you have assumed the responsibilities of Support Activities Director.

5.10.4 Direct the OSF coordinator to implement EPIP-OSF-02.

5.10.5 Designate an OSF assembly area giving consideration to manpower pool size and environmental conditions.

5.10.6 If needed, direct the OSF coordinator to initiate search and rescue operations (EPIP-OSF-04).

5.10.7 Contact the Emergency Director for information on plant status and immediate actions.

5.10.8 Direct emergency maintenance activities in accordance with the priorities established by the Emergency Director.

5.10.9 If required, request engineering support from the Engineering Coordinator.

5.10.10 Review the maintenance staffing requirements to mitigate the incident.

5.10.11 Brief the Emergency Director on OSF activities.

- OSF Activation and operational status
- OSF Facility Operations (EPIP-OSF-02)
- Maintenance Activities
- Search and Rescue (EPIP-OSF-04)

5.10.12 Ensure the OSF staff is informed of plant status and ED priorities.

5.10.13 If appropriate, plan for a shift relief per EPIP-AD-05.

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5.10.14 IF Final Conditions (Section 6.0) have **NOT** been met, **THEN GO TO step 5.10.6.**

5.10.15 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in the OSF (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

5.11 Site Protection Director (SPD) shall:

5.11.1 WHEN notified that an Emergency has been declared:

- a. Report to the Security Building.
- b. IF a Site Protection Director **HAS** been designated, UNTIL released, THEN:
 - If appropriate, plan a shift relief per EPIP-AD-05.
 - Assist the designated SPD.
- c. IF a Site Protection Director **HAS NOT** been designated, THEN assume the responsibilities of the SPD and continue implementing this procedure.

5.11.2 Notify the ED/TSCD of your arrival in the Security Building and assumption of the SPD responsibility.

5.11.3 Direct the implementation of "Security Force Response to Emergencies," EPIP-SEC-02.

5.11.4 Establish "Personnel Assembly and Accountability," EPIP-SEC-03.

5.11.5 IF Search and Rescue is required due to accountability results, THEN notify the Support Activities Director.

5.11.6 Direct the security staff to issue dosimetry to personnel responding from off-site (EPIP-SEC-04).

5.11.7 WHEN appropriate, relocate to the TSC.

5.11.8 Obtain information from the RPD or the Control Room concerning fire, chemical, or radiological hazards present within the protected area.

5.11.9 IF hazards identified by the RPD or the Control Room warrant it, THEN restrict ERO personnel movement.

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5.11.10 IF directed by the ED, THEN initiate a plant evacuation (EPIP-SEC-05).

5.11.11 Brief the Emergency Director on security activities:

- Removal of Visitors from site (i.e., fishermen) (EPIP-SEC-02)
- Personnel Accountability (EPIP-SEC-03)
- Plant Evacuations (EPIP-SEC-05)
- Access Control
- Dosimetry Issue (EPIP-SEC-04)
- Significant Security Activities

5.11.12 Ensure that the Security Force and staff are informed of any significant issues relative to their activities.

5.11.13 Ensure accountability is maintained (EPIP-SEC-03).

5.11.14 Review security staffing requirements and make appropriate adjustments.

5.11.15 If appropriate, plan for a shift relief per EPIP-AD-05.

5.11.16 IF Final Conditions (Section 6.0) have NOT been met, THEN GO TO step 5.10.8.

5.11.17 WHEN Final Conditions (Section 6.0) are met:

- a. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- b. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- c. Schedule a self critique with all event participants in Security (all shifts) as soon as practical. The procedure "Drill and Exercise Critiques," EPMP-02.04, should be used as a guide.

6.0 Final Conditions

- 6.1 Plant Emergency has been Terminated or Recovery actions have begun and the responsible Director has suspended the use of EIPs.

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7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 COMTRAK 87-152, Downgrading of EALs
- 7.3 COMTRAK 88-068, Calling in additional communicators as required
- 7.4 NRC Inspection Report K-87-195, same as Reference 7.2
- 7.5 10CFR50.72(c)(3), Maintaining open communications with the NRC
- 7.6 NAD-02.09, Occupational Injuries or Vehicle Accidents
- 7.7 EPIP-AD-02, Emergency Class Determination
- 7.8 EPIP-AD-04, KNPP Response to an Alert or Higher
- 7.9 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.10 EPIP-AD-07, Initial Emergency Notifications
- 7.11 EPIP-AD-11, Emergency Radiation Controls
- 7.12 EPIP-AD-15, Recovery Planning and Termination
- 7.13 EPIP-AD-19, Protective Action Guidelines
- 7.14 EPIP-EOF-08, Continuing Emergency Notifications
- 7.15 EPIP-OSF-04, Search and Rescue
- 7.16 EPIP-SEC-02, Security Force Response to Emergencies
- 7.17 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.18 EPIP-SEC-05, Personnel Evacuation
- 7.19 EPIP-APPX-A-02, Response Personnel Call List
- 7.20 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.21 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.22 Form GNP-11.04.04-1, Event Notification Worksheet

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7.23 Form EPIPF-AD-07-01, Event Notice

7.24 Form EPIPF-AD-07-02, State Call-Back - Question Guideline

8.0 Records

8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

- Event Notice, Form EPIPF-AD-07-01
- Event Notification Worksheet, Form GNP-11.04.04-1

8.1.2 Non-QA Records

None

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Reviewed By <i>[Signature]</i>		Approved By <i>[Signature]</i>			
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

1.0 Purpose

- 1.1 This procedure provides instruction for technical guidance to Severe Accident Management Operations (SAMOPs) and Technical Support Center staff members during implementation of the Kewaunee Nuclear Power Plant (KNPP) Integrated Plant Emergency Operating Procedures (IPEOPs).

2.0 General Notes

- 2.1 This procedure applies to steps in the IPEOPs that require consultation with the Plant Technical Support Engineering staff.

3.0 Precautions and Limitations

- 3.1 This procedure should only be used as a guide to the Technical Support staff. Plant parameters should be monitored to determine plant conditions prior to implementation of these guidelines.
- 3.2 Shift Manager and Event Operations Director approval is required to activate the Post-Accident Leakage Control System.

4.0 Initial Conditions

- 4.1 This procedure is used during a declared emergency when plant conditions require assistance by the Technical Support staff in the execution of IPEOPs.

5.0 Procedure

5.1 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

5.1.1 Evaluate Plant Status:

- a. This step instructs the operator to consult Technical Support staff to determine if E-MDS-30, Post-Accident Leakage Control System, should be implemented. Post-Accident Leakage Control System is actuated if Auxiliary Building radiation levels are increasing or significant core damage has occurred. Determination of whether E-MDS-30 is to be implemented should be made at this time because the procedure requires local actions which may be prohibited following transfer to Containment sump recirculation due to high radiation levels.

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- b. Chemistry is contacted to start up the Containment Hydrogen Monitoring System (EPIP-RET-03C) and obtain primary and secondary samples per other EIPs.

5.2 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

5.2.1 Request a dose projection on steaming steam generators from the Technical Support Staff:

- a. IF a large break LOCA has occurred, THEN the secondary side may still be relatively hot and at a pressure significantly higher than the Reactor Coolant System (RCS). IF this is the case, THEN the operator should attempt to cooldown and depressurize the steam generators. A dose projection is requested to be performed, per EPIP-RET-05, because radioactivity may have accumulated in the steam generators due to small leaks, existing prior to the LOCA, and that still remains in the steam generators despite any secondary-to-primary back-leakage that may have occurred.

5.3 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

5.3.1 Determine if Reactor Vessel Head Should Be Vented:

- a. The possibility exists for a noncondensable bubble to form in the reactor vessel head region during certain LOCA events (whenever saturation conditions exist in the vessel head or gas is injected into or generated within the RCS). The reactor vessel head might have to be vented using the Reactor Vessel Head Vent System to prevent the bubble from growing to the extent that core cooling flow is adversely affected.

5.3.2 Identify Growth of a Void in the Vessel:

- a. The growth of a void in the vessel upper head can be identified by monitoring the Reactor Vessel Liquid Inventory System (RVLIS) upper range. A RVLIS indicating less than a full upper head is the primary means of determining if voids exist. In addition to RVLIS, other indirect indications of voids in the RCS are listed below (these voids are not necessarily located in the reactor vessel head).
 1. Pressurizer level response to RCS pressure changes may not be normal if voids exist in the RCS. The pressurizer level may decrease during a RCS pressurization due to void compression or condensation. Also, the level may rise rapidly during a spraying operation due to void expansion or generation.
 2. An indication of reactor vessel head temperatures equal to or greater than saturation temperature warrants the assumption that a steam bubble has been generated in the reactor vessel head.

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3. The operator may suspect noncondensable voids in the RCS after either a complete SI accumulator tank discharge or an inadequate core cooling condition.
- b. IF a steam void is formed during post-LOCA cooldown and depressurization or during a steam generator tube rupture recovery, THEN no attempt should be made to condense the void through repressurization. Only RXCP restart or continued cooling from CRDM fans should be used. Refer to IPEOP FR-1.3 and Section 5.27 of this procedure.

5.4 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

5.4.1 Consult with Emergency Director for Additional Recovery Actions:

- a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
- b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

5.5 IPEOP E-1: LOSS OF REACTOR OR SECONDARY COOLANT

5.5.1 Evaluate Long-Term Plant Status:

- a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.
- b. Actions must be taken to adjust recirculation sump pH to between 8 and 10.5 within 48 hours of the start of the leak to prevent component stress corrosion cracking.

5.6 IPEOP ES-1.2: POST-LOCA COOLDOWN AND DEPRESSURIZATION

5.6.1 Check if RHR System Should Be Placed in Service:

- a. The RHR System is designed to operate below specific RCS pressure and temperature conditions (RCS hot leg temperature less than 400°F and RCS pressure less than 425 psig). Depending on the size of the break, different actions should be taken.

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- b. For smaller breaks, the SI pumps will have been stopped in most cases and most of the RWST water will still be available by the time the RHR System entry criteria are satisfied. For these cases, the RHR System could be placed in service with the RHR pumps taking suction from the hot legs. Any high-head pump left running would remain aligned in the cold leg injection mode taking suction from the RWST. When charging flow is established, the injection source is also from the RWST.
- c. For larger breaks, the RWST level will eventually decrease to the recirculation transfer setpoint and at least one RHR pump must be used for containment sump recirculation. IF the RHR System is not placed in service, THEN the system can remain in the long-term recirculation mode with the core residual heat being dissipated through the safeguards (RHR) heat exchangers.

5.6.2 Consider These Three Important Factors:

- a. The RWST (or alternate) source of injection (make-up) water must be available for operating high-head SI, charging pumps, and RHR in split-train operation.
- b. Confirmation of system availability, including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction, must take place before RHR operation can begin.
- c. Auxiliary building radiation levels should be evaluated. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event. Care should be taken to minimize the spread of radioactive fluid through the CVCS system, if possible. Additionally, during a design basis LOCA, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hr or more due to "shine" from the containment building.

5.7 IPEOP ES-1.2: POST-LOCA COOLDOWN AND DEPRESSURIZATION

5.7.1 Consult with Emergency Director for Additional Recovery Actions:

- a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
- b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

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5.8 IPEOP ES-1.2: POST-LOCA COOLDOWN AND DEPRESSURIZATION

5.8.1 Evaluate Long-Term Plant Status:

- a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term. IF the SI pumps were stopped, THEN RCS subcooling would have been restored and RCS circulation flow should have been adequate to prevent boron precipitation. Thus, the transfer of hot leg recirculation would probably not be needed for the smaller breaks where SI flow was reduced.

5.9 IPEOP ES-3.1: POST-SGTR COOLDOWN USING BACKFILL

5.9.1 Evaluate Long-Term Plant Status:

- a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.10 IPEOP ES-3.2: POST-SGTR COOLDOWN USING BLOWDOWN

5.10.1 Evaluate Long-Term Plant Status:

- a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.11 IPEOP ES-3.3: POST-SGTR COOLDOWN USING STEAM DUMP

5.11.1 Evaluate Long-Term Plant Status:

- a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

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5.12 IPEOP ECA-0.0: LOSS OF ALL AC POWER

5.12.1 IF core exit temperatures are greater than 1200°F and increasing, THEN go to SACRG-1, Severe Accident Control Room Guideline Initial Response.

- a. The Severe Accident Management Guidelines (SAMGs) are entered from the ERGs by Control Room Operators when core damage occurs. The ERG to SAMG transition uses, as part of the transition criteria, a core exit thermocouple temperature indication of greater than 1200°F to indicate the need to transition from the ERGs to the SAMGs. The 1200°F criteria for transition from the ERGs to the SAMGs is identical to the 1200°F criteria on the Core Cooling Critical Safety Function Status Tree.
- b. IF the Operator enters this step and core exit TC temperatures are greater than 1200°F and increasing, THEN the Operator should transition to the SAMGs. This condition indicates that all attempts to restore core cooling have failed, core damage cannot be prevented, and the Operator should go to the SAMGs.

5.13 IPEOP ECA-1.1: LOSS OF EMERGENCY COOLANT RECIRCULATION

5.13.1 Consult with Emergency Director to determine if RHR System should be placed in service.

- a. The RHR System is designed to operate below specific RCS pressure and temperature conditions. IF previous actions to establish conditions were not complete, THEN this step directs the Operator to continue with the procedure for completion of the actions. At this time, the plant staff should determine RHR System availability. RHR System availability includes confirmation of equipment needed for RHR System operation (RHR suction valves, RHR pumps, etc.) and confirmation of adequate liquid inventory in the RCS to preclude steam from entering the RHR pump suction.

5.13.2 Consult with Emergency Director for Additional Recovery Actions:

- a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
- b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

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5.13.3 Consult with Emergency Director:

- a. This procedure provides generic instructions for cooldown and depressurization of the plant to atmospheric conditions following a loss of emergency coolant recirculation. After the steps have been completed and cold shutdown conditions have been maintained, the Plant Engineering staff has time to evaluate the event and develop recovery procedures so that the Plant can be repaired and brought back to service.

5.14 IPEOP ECA-2.1: UNCONTROLLED DEPRESSURIZATION OF BOTH SGs

5.14.1 Evaluate Long-Term Plant Status:

- a. The equipment needed to function following an event has been designed so that operation for extremely long periods of time is possible. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.15 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

5.15.1 Consult with Emergency Director:

- a. This step instructs the Operator to consult with the Emergency Director when ruptured SG narrow range level exceeds 92%. An inability to prevent SG overfill may result from a rupture large enough to require the use of ECA-3.2, "SGTR with Loss of Reactor Coolant - Saturated Recovery Desired."

5.16 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

5.16.1 Check if RHR System Should Be Placed in Service:

- a. The RHR System is designed to operate below specific RCS pressure and temperature conditions (RCS hot leg temperature less than 400°F and RCS pressure less than 425 psig). When such conditions are established, the RHR System should be placed in service to complete the cooldown to cold shutdown and provide long-term cooling.

5.16.2 Consider These Three Important Factors:

- a. The RWST (or alternate) source of injection (makeup) water must be available for operating high-head SI, charging pumps, and RHR in split-train operation.

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- b. Confirmation of system availability including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction must take place before RHR operation can begin.
- c. Auxiliary building radiation levels should be evaluated. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event. Care should be taken to minimize the spread of radioactive fluid through the CVCS System if possible. Additionally, during some design basis accidents, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hr or more due to "shine" from the containment building.

5.17 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

5.17.1 Consult with Emergency Director for Additional Recovery Actions:

- a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
- b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

5.18 IPEOP ECA-3.1: SGTR WITH LOSS OF REACTOR COOLANT - SUBCOOLED RECOVERY DESIRED

5.18.1 Evaluate Long-Term Plant Status:

- a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.19 IPEOP ECA-3.2: SGTR WITH LOSS OF REACTOR COOLANT - SATURATED RECOVERY DESIRED

5.19.1 Check if RHR System Should Be Placed in Service:

- a. The RHR System is designed to operate below specific RCS pressure and temperature conditions (RCS hot leg temperature less than 400°F and RCS pressure less than 425 psig). When such conditions are established, the RHR System should be placed in service to complete the cooldown to cold shutdown and provide long-term cooling.

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5.19.2 Consider These Three Important Factors:

- a. The RWST (or alternate) source of injection (make-up) water must be available or operating high-head SI, charging pumps, and RHR in split-train operation.
- b. Confirmation of system availability including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction must take place before RHR operation can begin.
- c. Auxiliary building radiation levels should be evaluated. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event. Care should be taken to minimize the spread of radioactive fluid through the CVCS System if possible. Additionally, during some design basis accidents, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hour or more due to "shine" from the containment building.

5.20 IPEOP ECA-3.2: SGTR WITH LOSS OF REACTOR COOLANT - SATURATED RECOVERY DESIRED

5.20.1 Consult with Emergency Director for Additional Recovery Actions:

- a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
- b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

5.21 IPEOP ECA-3.2: SGTR WITH LOSS OF REACTOR COOLANT - SATURATED RECOVERY DESIRED

5.21.1 Evaluate Long-Term Plant Status:

- a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

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5.22 IPEOP ECA-3.3: SGTR WITHOUT PRESSURIZER PRESSURE CONTROL

5.22.1 Evaluate Long-Term Plant Status:

- a. After reaching and maintaining cold shutdown conditions, the plant is effectively stable for the long term. This allows the Plant Engineering staff time to evaluate the event and develop recovery procedures so that the plant can be repaired and brought back to service. Priority should be given, however, to ensure that equipment needed for accident mitigation remains operable.

5.23 IPEOP FR-S.1: RESPONSE TO NUCLEAR POWER GENERATION/ATWS

5.23.1 IF core exit temperatures are greater than 1200°F and increasing, THEN go to SACRG-1, Severe Accident Control Room Guideline Initial Response.

- a. The Severe Accident Management Guidelines (SAMGs) are entered from the ERGs by Control Room Operators when core damage occurs. The ERG to SAMG transition uses, as part of the transition criteria, a core exit thermocouple temperature indication of greater than 1200°F to indicate the need to transition from the ERGs to the SAMGs. The 1200°F criteria for transition from the ERGs to the SAMGs is identical to the 1200°F criteria on the Core Cooling Critical Safety Function Status Tree.
- b. IF the Operator enters this step and core exit TC temperatures are greater than 1200°F and increasing, THEN the Operator should transition to the SAMGs. This condition indicates that all attempts to restore core cooling have failed, core damage cannot be prevented, and the Operator should go to the SAMGs.

5.24 IPEOP FR-C.1: RESPONSE TO INADEQUATE CORE COOLING

5.24.1 IF core exit TC temperatures increasing AND RXCPs running in all available RCS cooling loops, THEN go to SACRG-1, Severe Accident Control Room Guideline Initial Response.

- a. The Severe Accident Management Guidelines (SAMGs) are entered from the ERGs by Control Room Operators when core damage occurs. The ERG to SAMG transition uses, as part of the transition criteria, a core exit thermocouple temperature indication of greater than 1200°F to indicate the need to transition from the ERGs to the SAMGs. The 1200°F criteria for transition from the ERGs to the SAMGs is identical to the 1200°F criteria on the Core Cooling Critical Safety Function Status Tree.
- b. IF the Operator enters this step and core exit TC temperatures are greater than 1200°F and increasing and all available RXCPs are running, THEN the Operator should transition to the SAMGs. This condition indicates that all attempts to restore core cooling have failed, core damage cannot be prevented, and the Operator should go to the SAMGs.

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5.24.2 Consult with Emergency Director for Additional Recovery Actions:

- a. This step instructs the operator to notify the Emergency Director when the hydrogen concentration inside containment is greater than 6% in dry air. The possible actions to be taken with high hydrogen concentrations in containment are dependent on the containment conditions, the event progression, and off-site conditions.
- b. Evaluate actions to be taken for high containment hydrogen concentration using SAG-7.

5.25 IPEOP FR-Z.2: RESPONSE TO CONTAINMENT FLOODING

5.25.1 Notify Emergency Director of Sump Level and Activity Level to Obtain Recommended Action:

- a. The ED should request evaluation of the cause of the event and provide specific recommendations to the Operators for reducing containment water level.

5.25.2 Consider the Following Three Methods to Reduce Flooding:

- a. Location of critical plant components in relation to containment sump water level.
- b. Location, size, and shielding of available storage tanks outside containment.
- c. Radiation concerns due to pump and line routing from the containment sump to the various storage tanks.

5.26 IPEOP FR-Z.3: RESPONSE TO HIGH CONTAINMENT RADIATION LEVEL

5.26.1 Notify Emergency Director of Containment Radiation Level to Obtain Recommended Action:

- a. After containment vent isolation has been verified, check the pressurizer water level, charging flow, and operation of the containment sump pumps to determine if a reactor coolant leak is occurring. IF there is a lack of evidence of a reactor coolant leak, THEN verify the alarm condition by selecting the fast advance on the air particulate and sample fresh air for about 15 seconds to confirm that the detector function is normal. IF it is normal, THEN notify the RPD.
- b. An additional area to be looked at is the possibility of fuel damage. By checking the thermocouple readings, hydrogen generation level, and RCS activity levels, it can be determined whether or not damage to the fuel has occurred.

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5.27 IPEOP FR-I.3: RESPONSE TO VOIDS IN REACTOR VESSEL

5.27.1 Obtain Maximum Allowable Venting Time from Technical Support Center Director (Per EPIP-TSC-07):

- a. Calculation of the maximum allowable venting time is based on maintaining containment hydrogen concentration below 3% in dry air. The lower the initial hydrogen concentration, the longer the venting can continue. Procedure EPIP-TSC-07 describes the method of determining RCS venting time.

6.0 Final Conditions

- 6.1 This procedure may be terminated when the emergency has been closed out or recovery operations have been entered, the plant is stable, and Operations has determined that technical support of IPEOPs is no longer required.

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Integrated Plant Emergency Operating Procedures
- 7.2 Westinghouse Owners Group Emergency Response Guidelines
- 7.3 SAG-7

8.0 Records

- 8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

None

8.1.2 Non-QA Records

None