



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

Point Beach Nuclear Plant  
6610 Nuclear Road  
Two Rivers, WI 54241  
920-755-2321

*Kewaunee / Point Beach Nuclear  
Operated by Nuclear Management Company, LLC*

NRC-01-115

November 19, 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, attached is 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  
Site Licensing Director

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  
Rec'd at NRC  
12/17/01*

KEWAUNEE NUCLEAR POWER PLANT

November 15, 2001

**EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM**

**RETURN TO DIANE FENCL - KNPP**

**OUTSIDE AGENCY COPIES (1-20)**

T. Webb - NRC Document Control Desk (1)*	Krista Kappelman - PBNP - EP (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)*	Jim Holthaus - Nuclear Management Company (12)*
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)	H. Kocourek (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, 66, 67, 68, 70, 72, 73, 74)
L. Welch - Fuel Services (65)	STF Library (43)
NO Library - KNPP (59)	Resource Center (82, 89, 94, 131)
C. Sternitzky - ATF-2 (44)	D. Schrank - Maintenance Off. (41)
D. Braun - ATF-3 (45)	D. Krall - CR/SS Office (51, 56)
P. Ehlen - I&C Office (42)	P&FS Adm - GB-D2 (Nuclear Library) (84)
M. Daron - Security Building (46)	H. Kocourek - TSC (50)
P&FS Adm - GB D2-3 (EOF) (81)	W. Galarneau - RAF (53)
H. Kocourek - OSF (52)	W. Galarneau - SBF/EMT (54)
C. Hutter - ATF-1 (64)	W. Galarneau - RPO (55)

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

W. Galarneau - RAF/RPO (106, 107)	D. Krall - CR/Communicator (116)(Partial Distribution)
W. Galarneau - SBF/ENV (108, 109)	Simulator/Communicator (117)
W. Galarneau - SBF/EM Team (110, 111, 111A)	M. Fencl - Security (121)
W. Galarneau - Aurora Medical Center (118, 119)	N. Deda - Security Building (120)
W. Flint - Cold Chem/HR Sample Room (113)	S. VanderBloomen (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**  
November 15, 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 Fencel by December 17, 2001, SIGNED AND DATED to serve as a record of revision.

**EPIP Index, dated 11-15-2001.**

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-02	AB	EPIP-AD-02	AC
EPIP-AD-03	AB	EPIP-AD-03	AC
EPIP-AD-04	AD	EPIP-AD-04	AE
EPIP-AD-07	AM	EPIP-AD-07	AN
		EPIP-AD-20	A
EPIP-EOF-11	T	EPIP-EOF-11	U
<del>Figure EPIPEG APPX A-02-01</del> <del>(Filed after EPIP APPX A-02)</del>	<del>A</del>	<del>Figure EPIPEG APPX A-02-01</del> <del>(Filed after EPIP APPX A-02)</del>	<del>B</del>
EPIP FORM AD 7.1	P	Form EPIPF-AD-07-01	Q
EPIP FORM AD 7.2	B	Form EPIPF-AD-07-02	C
EPIP FORM EOF 11.2	E	Form EPIPF-EOF-11-02	F
EPIP FORM EOF 11.3	E	Form EPIPF-EOF-11-03	F

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 Fencel

Enclosure

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EPIP-AD-03	KNPP Response to an Unusual Event	AC	11-15-2001
EPIP-AD-04	KNPP Response to Alert or Higher	AE	11-15-2001
EP-AD-5	Site Emergency	Deleted	04-27-87
EPIP-AD-05	Emergency Response Organization Shift Relief Guideline	C	06-05-2001
EP-AD-6	General Emergency	Deleted	04-24-87
EPIP-AD-07	Initial Emergency Notifications	AN	11-15-2001
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
EPIP-AD-11	Emergency Radiation Controls	Q	09-27-2001
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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	O	10-30-2001
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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EPIP-ENV-02	Environmental Monitoring Team Activation	X	10-02-2001
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	V	10-09-2001
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EP-ENV-3E	Manual Determination of X/Q	Deleted	04-24-87
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EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
EPIP-ENV-04C	Ground Deposition Sampling and Analysis	W	10-09-2001
EPIP-ENV-04D	Plume Tracking for Environmental Monitoring Teams	N	10-02-2001
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EP-ENV-5C	SAM II Operation	Deleted	04-14-86
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EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
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* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			
EP-TSC-9	Core Damage Assessment Using Released Radionuclides	Deleted	09-30-86
EP-TSC-9A*	Core Damage Assessment	I	02-23-99
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* EP-TSC-9A, Rev. D was totally deleted; therefore, EP-TSC-9B became EP-TSC-9A. EP-TSC-9B was previously EP-TSC-9C.			
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EPIP-APPX-A-03	Off-Site Telephone Numbers	BN	09-27-2001
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AD 11.1	Emergency Radiation Work Permit	F	04-16-96
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ENV-01-03	Meteorological and Plant Status Data	B	10-31-2000
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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
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TSC 8A.4	Steam Release Data/Calculation Sheet (STMRLS Program)	C	04-16-96
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TSC 9A.6	Core Damage Summary	C	02-14-95

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-AD-02	Rev.	AC
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Reviewed By <i>Tom Hooker</i>		Approved By <i>J.B. Schmitt</i>			
Nuclear Safety Related	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	PORC Review Required	<input checked="" type="checkbox"/> Yes <input 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 determining proper emergency classification listed in order to activate the appropriate level of response from the Kewaunee Nuclear Power Plant (KNPP) emergency response organization and off-site response organization.

## 2.0 General Notes

- 2.1 None

## 3.0 Precautions and Limitations

- 3.1 Plant monitors used to determine whether emergency classification levels are being exceeded should be checked for accuracy prior to declaring an emergency class (e.g., compare against redundant channels, determine if consistent with system status, or verification by sample analysis when required by Chart A(1).
- 3.2 This procedure is not written to facilitate de-escalation. Therefore, any decision to de-escalate must be based on a thorough review of procedures and plant conditions. If appropriate, it is preferable to terminate or enter recovery. However, there may be occasions where it is appropriate to de-escalate.
- 3.3 An emergency classification should be made within 15 minutes of recognizing that conditions exist requiring classification in accordance with the EALs. This 15 minute goal is in addition to the 15 minute notification requirement once an emergency declaration has been made on "Event Notice," Form EPIPF-AD-07-01. There are times when it may be appropriate to delay classification while significant changes in plant parameters are evaluated for their impact on classification. Examples of such events are an unanticipated:
- Plant Trip
  - SI Initiation
  - Entry into an orange or red path
  - Loss of a safety system

If such an event should occur during classification, it may be appropriate to exceed the 15 minute goal to ensure an accurate classification.

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#### 4.0 Initial Conditions

- 4.1 This procedure applies during any plant evolution that may result in an emergency declaration.

#### 5.0 Procedure

- 5.1 Determine if a plant emergency exists during abnormal plant conditions by referring to Table 2-1, Emergency Action Level Charts.
- 5.2 IF a plant emergency exists, THEN perform the required actions of the appropriate emergency procedure listed below:
- 5.2.1 EPIP-AD-03, "KNPP Response to an Unusual Event"
- 5.2.2 EPIP-AD-04, "KNPP Response to Alert or Higher"
- 5.3 As plant conditions change, continue referring to the Emergency Action Level Charts.
- 5.4 Determine if the emergency should be reclassified.
- 5.5 IF the event is reclassified, THEN return to Step 5.2.
- 5.6 IF Final Conditions (Section 6.0) are not met, THEN return to Step 5.3.
- 5.7 IF Final Conditions (Section 6.0) are met, THEN use of this procedure may be suspended.

#### 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.

#### 7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-AD-01, Personnel Response to the Plant Emergency Siren
- 7.3 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.4 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.5 COMTRAK 89-001, NRC Inspection Report 88-11, Improve Guidance for Fires Chart G
- 7.6 OEA 87-246, Report OE 2265, Improve Description of Unusual Aircraft Activity Chart P
- 7.7 NRC Letter 07-11-94, Branch Position on Acceptable Deviations to NUREG-0654



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## 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

## EMERGENCY ACTION LEVEL CHARTS

The following charts are separated into different abnormal operating conditions which may, depending upon their severity, be classified as an Unusual Event, Alert, Site Emergency, or General Emergency.

	CHART	PAGE
Abnormal Radiological Effluent	A (1)	4
Gaseous Effluent Action Levels	A (2)	5 - 7
Fuel Damage Indication	B	8
Primary Leak to LOCA	C	9
Primary to Secondary Leak	D	10
Loss of Power	E	11
Engineered Safety Feature Anomaly	F	12
Loss of Indication	G	13
DELETED	H	13
Secondary Side Anomaly	I	14
Miscellaneous Abnormal Plant Conditions	J	15
Fire and Fire Protection	K	16
DELETED	L	16
Earthquake	M	17
High Winds or Tornado	N	17
Flood, Low Water, or Seiche	O	18
External Events and Chemical Spills	P	19
Security Contingency	Q	20

# CHART A(1) ABNORMAL RADIOLOGICAL EFFLUENT

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
SEE CHART A(2)	Effluent monitors detect levels corresponding to greater than 1 rem/hr whole body or 5 rem/hr thyroid at the site boundary under " <u>actual meteorological</u> " conditions.	GENERAL EMERGENCY
Projected or measured dose rates to be provided by the Radiological Protection Director or Environmental Monitoring Teams.	Projected or measured in the environs dose rates greater than 1 rem/hr whole body or 5 rem/hr thyroid at the site boundary.	GENERAL EMERGENCY
SEE CHART A(2)	Effluent monitors detect levels corresponding to greater than 50 mr/hr for 1/2 hour <u>OR</u> greater than 500 mr/hr for two minutes (or five times these levels to the thyroid) <u>OR</u> for "adverse meteorology."	SITE EMERGENCY
Projected or measured dose rates to be provided by the Radiological Protection Director or Environmental Monitoring Teams.	At the site boundary, projected or measured dose rates greater than 50 mr/hr for 1/2 hours <u>OR</u> greater than 500 mr/hr for two minutes (or five times these levels to the thyroid) or EPA PAGs are projected to be exceeded outside the site boundary.	SITE EMERGENCY
SEE CHART A(2)	Radiological effluents greater than 10 times ODCM instantaneous limits.	ALERT
a. Containment R-2 OR R-7 $\geq 1.0E+4$ mr/hr, <u>OR</u> b. Charging Area R-4 $\geq 1.0E+4$ mr/hr, <u>OR</u> c. SFP Area R-5 $\geq 1.0E+4$ mr/hr, <u>OR</u> d. Plant area air sample indicates airborne contamination > 1,000 times the occupational DAC values.	Radiation levels or airborne contamination which indicate a severe degradation in the control of radioactive materials (e.g., radiation levels suddenly increase by a factor of 1,000).	ALERT
(1) <u>Gaseous Releases</u> : See Chart A(2) (2) <u>Liquid Releases</u> : Notification by the Rad-Chem Group of violating ODCM 3.3.1 limits.	Off site Dose Calculation Manual limits exceeded.	UNUSUAL EVENT

## CHART A(2) GASEOUS EFFLUENT ACTION LEVELS

### 1. AUX BUILDING VENT RELEASES - WITH SIGNIFICANT CORE DAMAGE

Instrument readings assuming a post accident gas release AND Containment High Range Radiation Monitors 42599 (R-40) and 42600 (R-41) reads 1000 R/hr within one-half hour of the accident.

NOTE: Use adverse meteorology conditions (ADV MET) only when, 10m and 60m wind speed < 5mph AND Delta-T > +2.4 degrees F or Sigma Theta is < 3.01 degrees. All other cases are average meteorology (AVG MET).

NOTE: R-13 and R-14 are expected to be off scale high during all events on this page.

SV & SFP FANS	AUX BLDG SPING MONITORS				AUX BLDG STACK MONITORS				EMERG. CLASS.
TOTAL NUMBER RUNNING	MID RANGE CPM (01-07) PPCS PT G9086G		HIGH RANGE CPM (01-09) PPCS PT G9088G		R-35 MR/HR		R-36 R/HR		
	AVG MET	ADV MET	AVG MET	ADV MET	AVG MET	ADV MET	AVG MET	ADV MET	
1	**	1.1E+4	6.5E+1	*	**	7.9E+2	1.27E+2	7.9E-1	GENERAL EMERG.
2	8.8E+5	5.5E+3	3.25E+1	*	**	3.9E+2	6.35E+1	4.0E-1	
3	5.9E+5	3.7E+3	2.16E+1	*	**	2.6E+2	4.2E+1	2.6E-1	
4	4.4E+5	2.7E+3	1.62E+1	*	**	2.0E+2	3.175E+1	2.0E-1	

1	8.8E+4	5.5E+2	3.0E+0	*	6.3E+3	3.9E+1	6.3E+0	*	SITE EMERG.
2	4.4E+4	2.7E+2	1.5E+0	*	3.1E+3	1.9E+1	3.1E+0	*	
3	2.9E+4	1.8E+2	1.0E+0	*	2.1E+3	1.3E+1	2.1E+0	*	
4	2.2E+4	1.3E+2	*	*	1.5E+3	9.5E+0	1.5E+0	*	

1	1.0E+3	6.2E+0	*	*	7.0E+1	*	*	*	ALERT
2	5.0E+2	3.1E+0	*	*	3.5E+1	*	*	*	
3	3.3E+2	2.0E+0	*	*	2.3E+1	*	*	*	
4	2.5E+2	1.5E+0	*	*	1.75E+1	*	*	*	

1	1.0E+2	6.2E-1	*	*	7.0E+0	*	*	*	UNUSUAL EVENT
2	5.0E+1	3.1E-1	*	*	3.5E+0	*	*	*	
3	3.3E+1	2.0E-1	*	*	2.3E+0	*	*	*	
4	2.5E+1	1.5E-1	*	*	1.7E+0	*	*	*	

\* Offscale Low

\*\* Offscale High (Confirmation Only)

## CHART A(2) GASEOUS EFFLUENT ACTION LEVELS continued

### 2. AUX BUILDING VENT RELEASES WITHOUT CORE DAMAGE

**NOTE:** Use adverse meteorology conditions (ADV MET) only when, 10m and 60m wind speed < 5mph AND Delta-T > +2.4 degrees F or Sigma Theta is < 3.01 degrees. All other cases are average meteorology (AVG MET).

**NOTE:** R-13 and R-14 are expected to be off scale high during all events on this page.

SV & SFP FANS	AUX BLDG SPING MONITORS				EMERG. CLASS.
TOTAL NUMBER RUNNING	MID RANGE CPM (01-07) PPCS PT G9086G		HIGH RANGE CPM (01-09) PPCS PT G9088G		
	AVG MET	ADV MET	AVG MET	ADV MET	
1	**	9.4E+4	1.6E+4	1.0E+2	GENERAL EMERG.
2	**	4.7E+4	8.0E+3	5.0E+1	
3	**	3.1E+4	5.3E+3	3.3E+1	
4	**	2.3E+4	4.0E+3	2.5E+1	

1	7.5E+5	4.6E+3	8.0E+2	5.0E+0	SITE EMERG.
2	3.7E+5	2.3E+3	4.0E+2	2.5E+0	
3	2.5E+5	1.5E+3	2.6E+2	1.6E+0	
4	1.8E+5	1.1E+3	2.0E+2	1.2E+0	

SV & SFP FANS TOTAL NUMBER RUNNING	AUX BLDG SPING MONITORS		EMERG. CLASS.
	LOW RANGE Ci/cc (01-05) PPCS PT G9084G	MID RANGE CPM (01-07) PPCS PT 9086G	
1	**	8.6E+3	ALERT
2	**	4.3E+3	
3	**	2.8E+3	
4	**	2.1E+3	

1	6.3E-2	8.6E+2	UNUSUAL EVENT
2	3.1E-2	4.3E+2	
3	2.1E-2	2.8E+2	
4	1.5E-2	2.1E+2	

\*\* Offscale High (Confirmation Only)

## CHART A(2) GASEOUS EFFLUENT ACTION LEVELS continued

### 3. STEAM LINE RELEASE WITH SIGNIFICANT CORE DAMAGE

Instrument readings assuming radioactive steam is releasing at a total of 1.4E+5 pounds per hour to the atmosphere AND Containment High Range Radiation Monitor 42599 (R-40) or 42600 (R-41) reads 1000 R/hr within one-half hour of the accident.

	"A" Steam Line Monitors		"B" Steam Line Monitors		Emergency Classification
R-15 (cpm)	R-31 (mR/hr)	R-32 (R/hr)	R-33 (mR/hr)	R-34 (R/hr)	
**	1.3E+3	E+0	1.3E+03	E+0	General Emergency
**	6.0E+1	--	6.0E+1	--	Site Emergency
**	1.5E-1	--	1.5E-1	--	Alert
2.0E+05	--	--	--	--	Unusual Event

\*\* Offscale High (Confirmation Only)

### 4. SHIELD BUILDING STACK RELEASE

Instrument readings assuming SBV System is operating in the recirculation mode.

Reactor Bldg. Discharge Vent SPING		Emergency Classification
PPCS PT G9077G (02-07) Mid Range (cpm)	PPCS PT G9079G (02-09) High Range (cpm)	
1.3E+05	1.5E+2	General Emergency
6.7E+03	7.0E+0	Site Emergency
1.5E+1	--	Alert
--	--	Unusual Event

## CHART B FUEL DAMAGE INDICATION

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) CET > 1,200 Degrees for greater than 15 minutes, <u>OR</u> (2) R40 or R41 > 1,000 r/hr, <u>OR</u> (3) SACRG-1, Severe Accident Control Room Guideline Initial Response has been implemented.	Plant conditions exist that make the release of large amounts of radioactivity in a short time period possible.	GENERAL EMERGENCY
(Applies when more than one spent fuel element is damaged.)  (1) <u>Fuel Handling accident in Containment</u> a. Alarm on R-11 <u>OR</u> R-12, <u>AND</u> b. Dropped spent fuel assembly, <u>OR</u> c. Report of a large object dropped in Rx core, <u>OR</u>  (2) <u>Fuel Handling Accident in Auxiliary Bldg.</u> a. Alarm on R-13 or R-14, <u>AND</u> b. A large object dropped in spent fuel pool, <u>OR</u> c. A dropped spent fuel assembly, <u>OR</u> d. A loss of water level below spent fuel.	Major damage to spent fuel in containment or auxiliary building.	SITE EMERGENCY
(1) R-9 indication is offscale high, <u>AND</u> (2) Laboratory analysis confirms RCS activity levels comparable to USAR Appendix D, Table D.4-1.	<u>Severe loss of fuel cladding</u>  a. Very high coolant activity sample  b. Failed fuel monitor indicates greater than 1% fuel failures within 30 minutes or 5% total fuel failures.	ALERT
(1) <u>Fuel Handling Accident in Containment</u> a. A confirming report, <u>AND</u> b. Alarm on R-11 <u>OR</u> R-12, <u>OR</u> (2) <u>Fuel Handling Accident in Auxiliary Bldg.</u> a. A confirming report, <u>AND</u> b. Alarm on R-13 <u>OR</u> R-14.	Fuel damage accident with release of radioactivity to containment or auxiliary building.	ALERT
(1) With RCS Temperature > 500°F, a. > 0.2 µCi/gram DOSE Equivalent I-131 for 48 hours, <u>OR</u> b. Exceeding T.S. figure 3.1-3 for Dose Equivalent I-131, <u>OR</u> c. > 91/Ē µCi/cc As determined by SP-37-065 (from T.S. 3.1.c)	High reactor coolant activity sample.	UNUSUAL EVENT
(1) R-9 is greater than 5.0 R/hr, <u>AND</u> (2) Verified by RCS chemistry sample analysis.	Failed fuel monitor indicates greater than 0.1% equivalent fuel failures within 30 minutes.	UNUSUAL EVENT

# CHART C PRIMARY LEAK TO LOCA

**NOTE:** This chart does not apply when leakage from the Reactor Coolant System is caused by a Steam Generator tube rupture.

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) <u>LOCA</u> is verified per IPEOP E-1, "Loss of Reactor or Secondary Coolant," <u>AND</u> (2) ECCS failure is indicated by: a. SI and RHR pumps not running, <u>OR</u> b. Verification of no flow to the reactor vessel, <u>OR</u> c. Core exit thermocouples indicate greater than 1,200°F, <u>AND</u> (3) Failure or potential failure of containment is indicated by: a. Physical evidence of containment structure damage, <u>OR</u> b. Containment Pressure is > 23 PSIG and loss of all containment fan coil units and both trains of ICS, <u>OR</u> c. Containment hydrogen monitor indicates ≥ 10% hydrogen concentration, <u>OR</u> d. Containment pressure exceeds 46 psig.	(1) Loss of coolant accident, <u>AND</u> (2) Initial or subsequent failure of ECCS, <u>AND</u> (3) Containment failure or potential failure exists (loss of 2 of 3 fission product barriers with a potential loss of 3rd barrier).	GENERAL EMERGENCY
(1) SI System is activated and RCS leakage exceeds charging system capacity as verified by Control Room indications or IPEOPs.	Reactor Coolant System leakage greater than make-up pump capacity.	SITE EMERGENCY
(1) Charging flow verses letdown flow indicates an unisolable RCS leak > 50 gpm.	Reactor Coolant System leak rate greater than 50 GPM.	ALERT
(1) Initiation of reactor shutdown <u>required</u> by Technical Specification, Section T.S. 3.1.d. Indicated leakage may be determined using Reactor Coolant System mass balance calculations performed by SP-36-082.	Exceeding Reactor Coolant System leak rate, Technical Specifications, requiring reactor shutdown.	UNUSUAL EVENT



# CHART D PRIMARY TO SECONDARY LEAK

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, <u>AND</u> (2) Primary-to-secondary flow > 800 GPM OR RCS pressure decreasing uncontrollably, <u>AND</u> (3) All three transformers Main Aux., Reserve Aux., and Tertiary Aux., are de-energized.	Rapid failure of steam generator tubes with loss of off-site power.	SITE EMERGENCY
(1) Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, <u>AND</u> (2) Primary-to-secondary leak rate > 400 GPM, <u>AND</u> (3) All three transformers: Main Aux., Reserve Aux., and Tertiary Aux., are de-energized.	Rapid gross failure of one steam generator tube with loss of off-site power.	ALERT
(1) Entry into IPEOP E-3, "Steam Generator Tube Rupture," is expected or has occurred, <u>AND</u> (2) Primary-to-secondary leak rate greater than 800 GPM indicated by SI flow <u>OR</u> RWST level change.	Rapid failure of multiple steam generator tubes.	ALERT
(1) Primary-to-secondary leakage > 150 gallons per day for more than 4 hours (TS 3.1.d.2).  (Do not delay declaration if leakage suddenly increases above 150 gallons per day <u>AND</u> plant shutdown actions are initiated.)	Exceeding Primary-to-Secondary leak rate Technical Specification.	UNUSUAL EVENT

## CHART E LOSS OF POWER

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) RCS is $\geq 350^{\circ}\text{F}$ , <u>AND</u> (2) Buses 1 through 6 are de-energized including the D/G supplies to buses 5 and 6, <u>AND</u> (3) Loss of the turbine driven AFW pump, <u>AND</u> (4) Conditions exist for greater than 2 hours.	Failure of off-site and on-site AC power, <u>AND</u> Total loss of auxiliary feedwater makeup capability for greater than 2 hours. (Loss of power plus loss of all AFW would lead to clad failure and potential containment failure.)	GENERAL EMERGENCY
(1) Buses 1 through 6 are de-energized including the D/G supplies to buses 5 and 6 for longer than 15 minutes. (Does not apply when core is unloaded or cavity is flooded with internals removed.)	Loss of off-site power, <u>AND</u> Loss of on-site AC power (for more than 15 minutes).	SITE EMERGENCY
(1) Low voltage lockout <u>OR</u> de-energized condition on all safeguards DC distribution cabinets for greater than 15 minutes. a. BRA 102 and BRB 102, <u>OR</u> b. BRA 104 and BRB 104, <u>OR</u> c. BRA 102 and BRB 104, <u>OR</u> d. BRB 102 and BRA 104 (Does not apply when core is unloaded or cavity is flooded with internals removed.)	Loss of all vital on-site DC power (for more than 15 minutes).	SITE EMERGENCY
(1) Low voltage lockout <u>OR</u> de-energized condition on all safeguards DC distribution cabinets for less than 15 minutes. a. BRA 102 and BRB 102, <u>OR</u> b. BRA 104 and BRB 104, <u>OR</u> c. BRA 102 and BRB 104, <u>OR</u> d. BRB 102 and BRA 104 (Does not apply when core is unloaded or cavity is flooded with internals removed.)	Loss of all vital on-site DC power (for less than 15 minutes).	ALERT
(1) Buses 1 through 6 are de-energized, <u>AND</u> (2) The D/G supplies to buses 5 and 6 do not respond as designed. AC power is restored to bus 5 or 6 within 15 minutes. (Does not apply when core is unloaded or cavity is flooded with internals removed.)	Loss of off-site power, <u>AND</u> Loss of on-site AC power (for less than 15 minutes.)	ALERT
(1) With the Reactor Coolant System above cold shutdown condition: a. All three transformers: Main Aux., Reserve Aux., and Tertiary are de-energized, <u>OR</u> b. Both D/Gs unavailable (unable to supply bus 5 or 6 by any means).	Loss of off-site power, <u>OR</u> Loss of on-site power capability.	UNUSUAL EVENT
(1) Core is unloaded or reactor cavity is flooded with internals removed, <u>AND</u> (2) Buses 1 through 6 are de-energized including the D/G supplies to buses 5 and 6 for longer than 15 minutes.	Loss of off-site power, <u>AND</u> Loss of on-site AC power (for more than 15 minutes).	UNUSUAL EVENT

# CHART F

## ENGINEERED SAFETY FEATURE ANOMALY

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
<p>(1) RCS &gt; 200°F with a loss of cooling capability or inventory control:</p> <ul style="list-style-type: none"> <li>a. Loss of negative reactivity control, <u>OR</u></li> <li>b. Steam dump, S/G safeties, and power operating reliefs not operable (&gt; 350°F), <u>OR</u></li> <li>c. Inability to feed S/Gs (No AFW or Main Feedwater/Condensate Flow), <u>OR</u></li> <li>d. Loss of RCS inventory control, <u>OR</u></li> <li>e. Loss of both trains of RHR, <u>AND</u> the inability to sustain either natural <u>OR</u> forced circulation with the steam generators (<math>\leq 350^{\circ}\text{F}</math>).</li> </ul> <p>(A Site Emergency should be declared upon the initiation of bleed and feed per FR H.1, "Response to Loss of Secondary Heat Sink")</p>	Complete loss of any function needed when RCS > 200°F.	SITE EMERGENCY
<p>(Apply this criteria when the RCS is <math>\leq 200^{\circ}\text{F}</math>.)</p> <p>(1) Loss of both trains of RHR</p> <p>(Does not apply when core is unloaded <u>OR</u> cavity is flooded with internals removed.)</p>	Complete loss of any function needed when RCS $\leq 200^{\circ}\text{F}$ .	ALERT
<p>(1) Failure of both Rx trip breakers to open upon receipt of a valid signal. Applies even if IPEOP FR S.1 is not entered.</p>	Failure of the Reactor Protection System to initiate and complete a reactor trip which brings the reactor subcritical.	ALERT
<p>(1) Loss of ESF function, required support function or required Tech Spec instruments <u>OR</u> Exceeding Tech Spec Safety Limits, <u>AND</u></p> <p>(2) upon discovery, inability or failure to take required shutdown or mode change actions within the required time.</p> <p>(Total loss of AFW system when required (FR-H.1 implemented) should be declared a UE regardless of Tech Spec action compliance.)</p>	Inability to reach required shutdown within Tech Spec limits	UNUSUAL EVENT

## CHART G LOSS OF INDICATION

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) Total loss of Annunciator System computer alarms, and sequence of events recorder for greater than 15 minutes, <u>AND</u> (2) Uncontrolled plant transient in progress or initiated during the loss.	Most or all alarms (annunciators) lost and a plant transient initiated or in progress.	SITE EMERGENCY
(1) Total loss of Annunciator System, computer alarms, and sequence of events recorder. (Not applicable when plant is at or below cold shutdown.)	Most or all alarms (annunciators) lost.	ALERT
(1) Significant loss of ESF or Rx Protection instrumentation. An Unusual Event should <u>NOT</u> be declared for a non-emergency Tech Spec backdown, when the affected parameter remains monitorable.  (Not applicable when plant is at or below cold shutdown.)	Indications or alarms on process or effluent parameters not functional in control room to an extent requiring plant shutdown or other significant loss of assessment capability.	UNUSUAL EVENT

## CHART H (DELETED)

# CHART I SECONDARY SIDE ANOMALY

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) Main steam line break that results in a SI actuation, <u>AND</u> (2) a. R-15 or R-19 reads offscale high with confirmation by chemistry analysis, <u>OR</u> b. Primary-to-secondary leakage > 50 gpm, <u>AND</u> (3) a. R-9 or CNTMT high range rad monitors (42599, 42600) indicate > 10 R/hr, <u>OR</u> b. CNTMT hydrogen monitor indicates > 1% hydrogen concentration.	Steam line break, <u>AND</u> Primary-to-secondary leak > 50 GPM, <u>AND</u> Indication of Fuel Damage.	SITE EMERGENCY
(1) Main steam line break that results in a SI actuation, <u>AND</u> a. R-15 <u>OR</u> R-19 reads a factor of 1000 above normal, <u>OR</u> b. Primary-to-secondary leakage > 10 gpm.	Steam line break with significant (greater than 10 GPM) primary-to-secondary leakage. (Applies even if events occur in opposite steam generators.)	ALERT
(1) Turbine trip and observation of penetration of casing.	Turbine rotating component failure causing rapid plant shutdown.	UNUSUAL EVENT
(1) The uncontrolled depressurization of the secondary system that results in an SI actuation.	Rapid depressurization of the secondary side.	UNUSUAL EVENT

# CHART J

## MISCELLANEOUS ABNORMAL PLANT CONDITIONS

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
<p>(1) Containment boundary failure or potential failure:</p> <p>a. Containment pressure &gt; 46 psig, <u>OR</u></p> <p>b. Loss of all containment fan coil units and both trains of ICS, <u>OR</u></p> <p>c. Containment hydrogen monitor <math>\geq 10\%</math> hydrogen concentration, <u>AND</u></p> <p>(2) Loss of core cooling capability:</p> <p>a. Loss of SI and RHR flow, <u>AND</u></p> <p>(3) Failure of shutdown system when required:</p> <p>a. Entry into IPEOP FR-S.1, "Response to Nuclear Power Generation/ATWS," <u>OR</u></p> <p>b. Loss of AFW for greater than 30 minutes with loss of main FW and condensate.</p>	<p>Other plant conditions that make a release of large amounts of radioactivity in a short time period possible; e.g., any core melt situation.</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>- Failure of main FW and AFW systems for greater than 30 minutes without Safety Injection and Residual Heat Removal flow. Plus a containment failure is imminent.</li> <li>- Transient requiring the operation of shutdown systems with a failure of these shutdown systems. In addition, failure of SI and RHR and containment failure is imminent.</li> </ul>	GENERAL EMERGENCY
<p>(1) Evacuation of Control Room (E-O-06 event).</p>	Evacuation of control room and control of shutdown systems required from local stations.	SITE EMERGENCY
<p>(1) Conditions that warrant increased awareness on part of the plant staff will be evaluated by the Plant Manager or his designate. This is to determine if conditions are applicable for activating the E.P.</p> <p><u>Example:</u> Loss of AFW system when required, validated upon implementation of FR H.1 "Response to Loss of Secondary Heat Sink."</p>	Other plant conditions that warrant increased awareness on the part of plant staff or state and/or local authorities.	UNUSUAL EVENT

# **CHART K** **FIRE AND FIRE PROTECTION**

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) A fire within the Auxiliary Building, Technical Support Center, safeguards alley, D/G rooms, Battery Rooms, or screenhouse that defeats redundant safety trains of ESF equipment causing the required ESF system to be inoperable.	A fire compromising the functions of safety systems.	SITE EMERGENCY
(1) A fire within the Auxiliary Building, Technical Support Center, safeguards alley, D/G rooms, Battery Rooms, or screenhouse that lasts more than 10 minutes <u>OR</u> causes a single train of required ESF equipment to be inoperable.	A fire potentially affecting safety systems.	ALERT
(1) A fire within the Administration Building, Turbine Building, Warehouse Annex, or Containment Building lasting more than 10 minutes.	A fire within the plant lasting more than 10 minutes.	UNUSUAL EVENT

## **CHART L**

(DELETED)

## CHART M EARTHQUAKE

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) Activation of seismic recorder with TRIGGER, OBE, and DBE lights lit in relay room on RR159, <u>AND</u> (2) Verification of a seismic event by physical experience or from U. of W. - Milwaukee Seismic Center.	An earthquake greater than Design Basis Earthquake (DBE).	SITE EMERGENCY
(1) Activation of seismic recorder with TRIGGER, and OBE lights lit in relay room on RR159, <u>AND</u> (2) Verification of a seismic event by physical experience or from U. of W. - Milwaukee Seismic Center.	An earthquake greater than Operational Basis Earthquake (OBE).	ALERT
(1) Activation of seismic recorder with TRIGGER light lit in relay room on RR159, <u>OR</u> (2) An earthquake felt in the Plant*. (*Should be confirmed by evidence of physical damage or verification from University of Wisconsin Seismic Center.)	An earthquake felt in plant or detected on station seismic instrumentation.	UNUSUAL EVENT

NOTE: Telephone numbers for U of W - Milwaukee Seismic Center are in EPIP-APPX-A-03.

## CHART N HIGH WINDS OR TORNADO

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) Winds in excess of 100 mph for greater than 1 hour, <u>AND</u> (2) Plant above cold shutdown condition.	Sustained winds in excess of design levels with plant not in cold shutdown.	SITE EMERGENCY
(1) A tornado which strikes the facility, <u>AND</u> (2) Causes damage to render a single train of required ESF equipment to be inoperable.	Any tornado striking facility.	ALERT
(1) A tornado observed on-site causing significant damage to the facility.	Any tornado on-site.	UNUSUAL EVENT



# CHART O

## FLOOD, LOW WATER, OR SEICHE

KNPP INDICATION				EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
FOREBAY LEVEL Indicated for > 15 minutes				Flood, low water, or seiche near design levels.	ALERT
0 PUMPS	1 PUMP	2 PUMPS	CORRESPOND TO LAKE LEVEL		
NOTE 3	NOTE 1	≥ 94% *	≥ 588 ft.		
< 50% *	NOTE 5	NOTE 5	< 568.5 ft.		
OR Deep water Wave ≥ 22.5 ft.					
FOREBAY LEVEL Indicated for > 15 minutes				50-year flood, low water level or seiche	UNUSUAL EVENT
0 PUMPS	1 PUMP	2 PUMPS	CORRESPOND TO LAKE LEVEL		
NOTE 2	≥ 98% *	≥ 88% *	≥ 586 ft.		
< 53.1% *	< 46.9% * NOTE 4	NOTE 5	< 569.5 ft.		
OR Deep water wave ≥ 18 ft. (as confirmed by the Corps of Engineers)					

**NOTE 1:** Above the bottom of bar No. 1 painted on the south wall of the forebay.

**NOTE 2:** Above the bottom of bar No. 2 painted on the south wall of the forebay.

**NOTE 3:** Above the bottom of bar No. 3 painted on the south wall of the forebay.

**NOTE 4:** Applies to an uncontrollable decrease (cannot be restored by operator action. If the water box inlet valves are throttled, use other means to determine lake level per E-CW-04, "Loss of Circulating Water.")

**NOTE 5:** The corresponding forebay level for the associated lake level is below the circulating water pump trip setpoint of 42%. Therefore, this criterion will not be reached.

\* Computer point for forebay level is L09075A and should be used because of its greater accuracy. Plant elevations and lake elevations are referenced to International Great Lakes Datum (IGLD), 1955

(IGLD 1955 = IGLD 1985 - 0.7 FEET)

## CHART P

### EXTERNAL EVENTS AND CHEMICAL SPILLS

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) An aircraft crash into plant buildings which causes a complete loss of an ESF function.	Aircraft crash affecting vital structures by impact <u>OR</u> fire.	SITE EMERGENCY
(1) A missile strikes plant buildings, <u>OR</u> (2) An explosion occurs within a plant building, which causes a complete loss of an ESF function.	Severe damage to safe shutdown equipment from missiles or explosion.	SITE EMERGENCY
(1) Release of flammable or toxic gas from a ruptured container, which causes or is likely to cause evacuation of stations necessary to control shutdown systems, <u>AND</u> (2) Portable monitors indicate toxic or explosive concentrations of the gas at life threatening levels in those vital areas.	Uncontrolled release of toxic or flammable gas is confirmed within vital area.	SITE EMERGENCY
(1) An aircraft crashes into plant buildings <u>AND</u> causes a single train of required ESF equipment to be inoperable.	Aircraft crash on facility.	ALERT
(1) A missile strikes the facility <u>AND</u> causes a single train of required ESF equipment to be inoperable.	Missile impact from whatever source on facility.	ALERT
(1) Release of toxic or flammable gas at life threatening levels from a ruptured container enter the protected area <u>AND</u> impacts safe operation of the plant.	Uncontrolled release of toxic or flammable gas is confirmed within the protected area.	ALERT
(1) Self-explanatory.	Known explosion damage to facility affecting plant operation.	ALERT
(1) An aircraft crash within the site boundary, <u>OR</u> (2) Unusual aircraft activity such as erratic flying, dropped unidentified object, or other hostile acts, which threaten the plant or plant personnel. (Any other persistent aircraft activity for which identification attempts through the FAA or other agencies have been unsuccessful.)	Aircraft crash on-site or unusual aircraft activity over facility.	UNUSUAL EVENT
(1) Release of toxic or flammable gas from a ruptured tank/truck on site, <u>AND</u> (2) Portable monitors indicate toxic or explosive concentrations at life threatening levels of the gas near the spill area.	Uncontrolled release of toxic or flammable gas is confirmed on site.	UNUSUAL EVENT

## CHART Q SECURITY CONTINGENCY

KNPP INDICATION	EMERGENCY CLASSIFICATION CRITERIA	CLASSIFICATION
(1) Physical attack on the plant that has resulted in unauthorized personnel occupying the control room or any other vital areas as described in the Security Plan.	Loss of physical control of the plant.	GENERAL EMERGENCY
(1) Physical attack on the plant involving imminent occupancy of the control room, auxiliary shutdown panels, or other vital areas as defined by the Security Plan.	Imminent loss of physical control of the plant.	SITE EMERGENCY
(1) Security safeguards contingency event that results in a hostile force entering the protected area of the plant, but not gaining control over shutdown capability or of any vital areas as defined in the Security Plan, <u>OR</u> (2) Security safeguards contingency event that results in a site specific HI level CREDIBLE threat as defined in the Security Plan.	Ongoing security compromise.	ALERT
(1) Security safeguards contingency event that results in a site specific LO level CREDIBLE threat as defined in the Security Plan, <u>OR</u> (2) Security safeguards contingency event that results in a Bomb threat accompanied by interception of bomb materials, <u>OR</u> (3) Security safeguards contingency event that results in an attempted entry into the protected area of the plant by a hostile force, <u>OR</u> (4) Security safeguards contingency event that results in undetonated bomb found within the protected area.	Security threat or attempted entry or attempted sabotage.	UNUSUAL EVENT

NOTE: Security staff will NOT act as notifier during security events. Utilize Control Room staff for notifications.

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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 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 Telephone Response 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 The classification of an event should be performed within 15 minutes of recognizing that conditions exist requiring that classification and the subsequent declaration on "Event Notice," Form EPIP-AD-07-01. "Event Notice," Form EPIP-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 10CFR 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 **Unusual Event**.

#### 5.0 Procedure

5.1 SM/ED shall take the following Initial Actions:

5.1.1 IF a credible security threat (Lo) exists, THEN go to EPIP-AD-20, "KNPP Response to a Security Threat" (Reference Operations Procedure E-0-08).

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

5.1.3 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.

5.1.4 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 (Reference Operations Procedure E-0-08).

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5.1.5 Choose and perform the appropriate plant announcement using plant Gai-tronics.

- 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)

- 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)

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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 EPIPF-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 EPIPF-AD-07-01, completed in Step 5.1.7.

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.

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5.1.14 Update facility directors as needed including such information as:

- Current Emergency Classification
- Conclusions that led to the current classification
- Conditions that may be improving or declining
- Potential changes in status and possible classification changes

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:

- a. Report to the Control Room.
- b. IF an Emergency Director has been designated, UNTIL released, THEN 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.

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 IF appropriate, THEN relocate to the Technical Support Center (TSC).

5.2.5 Ensure the overall emergency level is continually reviewed.

- a. \_\_\_\_\_ Event Classification (EPIP-AD-02)
- b. \_\_\_\_\_ PAR (EPIP-AD-19)
- c. \_\_\_\_\_ Emergency radiological exposures (EPIP-AD-11)



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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.

- 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)
  - Emergency Radiation Controls (EPIP-AD-11) (actions taken in response to this procedure)
  - Status of Personal Injuries or Vehicle Accidents
- c. \_\_\_\_\_ Technical Support Center Director (TSCD):
  - Significant Plant Trends
  - Emergency Response Status
- d. \_\_\_\_\_ Support Activities Director (SAD):
  - Maintenance Activities
  - Search and Rescue (EPIP-OSF-04)
  - Maintenance Support Requirements
- e. \_\_\_\_\_ 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 EPIP-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."

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 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 10CFR50.72(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 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 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 During Operations
- 7.7 EPIP-AD-02, Emergency Class Determination
- 7.8 EPIP-AD-04, KNPP Response to 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-AD-20, KNPP Response to a Security Threat
- 7.15 EPIP-EOF-08, Continuing Emergency Notifications
- 7.16 EPIP-OSF-04, Search and Rescue
- 7.17 EPIP-SEC-02, Security Force Response to Emergencies
- 7.18 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.19 EPIP-SEC-05, Personnel Evacuation
- 7.20 EPIP-TSC-02, Technical Support Center Activation
- 7.21 EPIP-APPX-A-02, Response Personnel Call List
- 7.22 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.23 EPMP-02.01, Declared Emergency Evaluation and Documentation



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- 7.24 EPMP-02.04, Drill and Exercise Critiques
- 7.25 Form GNP-11.04.04-1, Event Notification Worksheet
- 7.26 Form EPIPF-AD-07-01, Event Notice
- 7.27 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>John M. Bartelme</i>		Approved By <i>David R. Seibert</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 **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, "Protective Action Guidelines").
- 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 Telephone Response Center 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 The classification of an event should be performed within 15 minutes of recognizing that conditions exist requiring that classification and the subsequent declaration on "Event Notice," Form EPIPF-AD-07-01. "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.

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3.3 The following responsibilities of the ED shall NOT be delegated: \_\_\_\_\_

- 3.3.1 Determination of emergency classification (EPIP-AD-02, "Emergency Class Determination").
- 3.3.2 Authorization of emergency exposures in excess of 10CFR Part 20 limits (EPIP-AD-11, "Emergency Radiation Controls").
- 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 IF a security threat exists, THEN go to EPIP-AD-20, "KNPP Response to a Security Threat" (Reference Operations Procedure E-0-08).
- 5.1.2 Contact the Shift Technical Advisor (STA) and direct them to report to the Control Room.
- 5.1.3 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.
- 5.1.4 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 (Reference Operations Procedure E-0-08).

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5.1.5 Initiate personnel assembly. \_\_\_\_\_

- a. Prepare your Gai-tronics message by making the choices identified in the box below in Step 5.1.4.c.
- b. Sound the plant siren.
- c. Read aloud two 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)

5.1.6 Contact the Security Shift Captain/Site Protection Director.

- a. Verify “Security Force Response to Emergencies,” 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.*

- 5.1.7 Complete the "Event Notice," Form EPIPF-AD-07-01.

**Note**

*Adverse meteorology exists if:*

1. The 10 AND 60 meter wind speed is less than 5 mph, AND
  2. Delta T is greater than +2.4°F OR Sigma Theta is less than 3.01 degrees.  
(Refer to Graphic Display #52 from the Honeywell terminal).
- a. IF adverse meteorology does NOT exist, THEN complete Box 7 by getting the downwind sector(s) from the guide on the back of Form EPIPF-AD-07-01.
  - b. IF adverse meteorology does exist, THEN enter N/A in Box 7 and explain in Box 10.
  - c. IF the event is a General Emergency and adverse meteorology does NOT exist, WHEN completing Part #9, THEN check the following items:
    - (B) 0 to 2 mile radius.
  - d. IF the event is a General Emergency and adverse meteorology exists, WHEN completing Part #9, THEN check the following item:
    - (C) 0 to 5 mile radius.

**Note**

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

- (D) 2 to 5 miles in sectors \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.
- e. IF the event is an Alert or Site Emergency, WHEN completing Part #9, THEN 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.*

- 5.1.8 Direct the Notifier/Communicator to initiate notifications per EPIP-AD-07, "Initial Emergency Notifications," using the "Event Notice," Form EPIPF-AD-07-01, completed in Step 5.1.6.

- 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.

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- 5.1.10 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.)
- 5.1.11 Direct the STA to notify the NRC in accordance with Step 5.6.3 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 Verify Control Room Ventilation System operation.
- 5.1.15 Report any increase in Control Room radiation to the Radiological Protection Director (RPD) for habitability assessment.
- 5.1.16 Request support from Technical Support Center (TSC) or OSF staff as needed.
- 5.1.17 Update facility directors as needed including such information as:
- Current Emergency Classification
  - Conclusions that led to the current classification
  - Conditions that may be improving or declining
  - Potential changes in status and possible classification changes
- 5.1.18 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, THEN until released,
    - 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.

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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.

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.

- a. \_\_\_\_\_ Event Classification (EPIP-AD-02)
- b. \_\_\_\_\_ PAR (EPIP-AD-19)
- c. \_\_\_\_\_ 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:

- a. 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 5.2.7(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 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)



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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, “Continuing Emergency Notifications”).

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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 5.6.3 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, "Potassium Iodide Distribution")
  - c. \_\_\_\_\_ Technical Support Center Director (TSCD):
    - TSC Activation and Operational Status (EPIP-TSC-02, Technical Support Center Activation")
    - Significant Plant Trends
    - "Core Damage Assessment" (EPIP-TSC-09A, "Core Damage Assessment")
  - d. \_\_\_\_\_ Support Activities Director (SAD):
    - OSF Activation and operational status
    - OSF Facility Operations (EPIP-OSF-02, "Operational Support Facility Operations")
    - Maintenance Activities
    - "Search and Rescue" (EPIP-OSF-04, "Search and Rescue")

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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:

- a. 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).
- b. 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.

- 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, THEN 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.

5.2.13 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, THEN read aloud two 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 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 EIPF-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:

- a. Report to the Control Room immediately.
- b. IF the Control Room Communicator has been designated, THEN until released, assist the designated Control Room Communicator.
- 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 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. Verify that the bell switch on the emergency government verification line is in the ON position.
- b. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to their proper place.
- c. 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, THEN until released, 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, "Emergency Response Organization Shift Relief Guideline."

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 10CFR50.72(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:

- a. Brief on plant conditions, the status of NRC notification and updates.
- b. 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:

- 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.

5.7 **Event Operations Director (EOD) shall:**

5.7.1 WHEN notified that an Emergency has been declared:

- a. Report to the Control Room.
- b. IF an Event Operations Director has been designated, THEN until released,
  - If appropriate, plan a shift relief per EPIP-AD-05, AND
  - Assist the designated Event Operations Director.
- c. 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
- 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).
  - 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.
- Review WR and designate retest requirements.
  - If required to do the job, 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, THEN until released,
  - 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, "RPO - RAF Activation").

5.8.4 The RPD shall relocate the RPO to the RAF at an alert or higher.

5.8.5 Direct staff to establish Radiation Emergency Team organization (EPIP-RET-02, "In-Plant Radiation Emergency Team").

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

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

5.8.8 Check radiological and meteorological information available in the TSC.

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

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

5.8.11 Verify controlled area access is being maintained (EPIP-RET-02D, "Emergency Radiation Entry Controls and Implementation").

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5.8.12 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
- "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

5.8.13 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, "Dose Projection Using RASCAL Version 2.2 Software").

5.8.14 Monitor plant conditions for indications of radioactive iodine and with concurrence of the ED make KI available, if appropriate (EPIP-AD-18).

5.8.15 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.*

5.8.16 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 Sheriff's 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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5.8.17 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).

5.8.18 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.

5.8.19 If appropriate for long term accident support, then coordinate with the ALD to establish contract support.

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

5.8.21 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.8.5.

5.8.22 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:
  - 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, "Technical Support for IPEOPs")

b. \_\_\_\_\_ Engineering Coordinator:

- Design change activities (EPIP-TSC-04, "Emergency Physical Changes, Major Equipment Repair")
- Work requests (EPIP-OSF-03, "Work Requests During an Emergency")
- Support Activities



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- c. \_\_\_\_\_ Core Hydraulics Coordinator:
    - Core Damage Assessment (EPIP-TSC-09A)
    - If appropriate, Steam Release Calculations (EPIP-TSC-08A, "Calculations for Steam Release from Steam Generators")
    - If appropriate, Head Venting Calculations (EPIP-TSC-07, "RV Head Venting Time Calculation")
  - 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.

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- 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.

**5.10 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, THEN until released,
  - 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)

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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.

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:
  - 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.

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

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 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 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 During Operations
- 7.7 EPIP-AD-02, Emergency Class Determination
- 7.8 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.9 EPIP-AD-07, Initial Emergency Notifications
- 7.10 EPIP-AD-11, Emergency Radiation Controls
- 7.11 EPIP-AD-15, Recovery Planning and Termination
- 7.12 EPIP-AD-18, Potassium Iodide Distribution
- 7.13 EPIP-AD-19, Protective Action Guidelines
- 7.14 EPIP-AD-20, KNPP Response to a Security Threat
- 7.15 EPIP-ENV-03C, Dose Projection Using RASCAL Version 2.2 Software
- 7.16 EPIP-EOF-08, Continuing Emergency Notifications
- 7.17 EPIP-OSF-02, Operational Support Facility Operations
- 7.18 EPIP-OSF-03, Work Requests During an Emergency
- 7.19 EPIP-OSF-04, Search and Rescue
- 7.20 EPIP-RET-02, In-Plant Radiation Emergency Team
- 7.21 EPIP-RET-02A, RPO - RAF Activation
- 7.22 EPIP-RET-02B, Gaseous Effluent Sample and Analysis
- 7.23 EPIP-RET-02D, Emergency Radiation Entry Controls and Implementation

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- 7.24 EPIP-RET-03A, Liquid Effluent Release Paths
- 7.25 EPIP-RET-03C, Post Accident Operation of the High Radiation Sample Room
- 7.26 EPIP-RET-03D, Containment Air Sampling Analysis Using CASP
- 7.27 EPIP-RET-04A, SBF Operation/Relocation
- 7.28 EPIP-RET-05, Site Boundary Dose Rates During Controlled Plant Cooldown
- 7.29 EPIP-RET-08, Contamination Control of the Aurora Medical Center
- 7.30 EPIP-RET-09, Post-Accident Population Dose
- 7.31 EPIP-SEC-02, Security Force Response to Emergencies
- 7.32 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.33 EPIP-SEC-05, Personnel Evacuation
- 7.34 EPIP-TSC-02, Technical Support Center Activation
- 7.35 EPIP-TSC-04, Emergency Physical Changes, Major Equipment Repair
- 7.36 EPIP-TSC-07, RV Head Venting Time Calculation
- 7.37 EPIP-TSC-10, Technical Support for IPEOPs
- 7.38 EPIP-TSC-09A, Core Damage Assessment
- 7.39 EPIP-APPX-A-02, Response Personnel Call List
- 7.40 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.41 EPMP-02.01, Declared Emergency Evaluation and Documentation
- 7.42 EPMP-02.04, Drill/Exercise Critique and Assessment

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## 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>W. M. Bartelme</i>		Approved By <i>Daniel R. Seibert</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 Notifier (SEC-N), Control Room Communicator (CRCM), EOF Communicator (EOFCM), or Off-Site Communicator (OFFCM) for notification of Off-Site Authorities of an emergency event escalation, de-escalation, change in Protective Action Recommendation (PAR), termination, or entry into recovery, as directed by the Shift Manager (SM), Emergency Director (ED), or Emergency Response Manager (ERM).

## 2.0 General Notes

- 2.1 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.
- 2.2 IF more than one communicator is available, THEN it is preferred that Steps 5.2 and 5.5 be performed in parallel.

## 3.0 Precautions and Limitations

- 3.1 The classification of an event should be performed within 15 minutes of recognizing that conditions exist requiring that classification and the subsequent declaration on "Event Notice," Form EPIPF-AD-07.01. 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 UNTIL off-site notifications are transferred to the Emergency Operations Facility (EOF) or Technical Support Center (TSC), verify the bell switch on Government Verification Phone is ON.
- 3.3 IF an event is terminated prior to the initial notification of the event, THEN the off-site notification of the declaration of the event AND the termination of the same event can be made simultaneously by using an appropriately completed "Event Notice," Form EPIPF-AD-07-01. Notification of the Emergency Response Organization (ERO) (Step 5.5) is not required in this circumstance.
- 3.4 IF an emergency class escalation, de-escalation, change in PAR, termination, or entry into recovery occurs during the notification AND prior to transfer of off-site notifications to the TSC or EOF, THEN disregard any remaining steps and return to Step 5.1. Begin the appropriate actions and notifications for the new emergency level.



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#### 4.0 Initial Conditions

- 4.1 This procedure is initiated for the Initial event notifications and will continue to be used for event notifications until the State of Wisconsin Emergency Operations Center (State EOC) is activated. This procedure shall be implemented upon an event • **DECLARATION**, • **ESCALATION**, • **DE-ESCALATION**, • **CHANGE IN PAR**, • **TERMINATION**, or • **ENTRY INTO RECOVERY**, as directed by the SM/ED/ERM.

#### 5.0 Procedure

- 5.1 IF the State EOC is activated, THEN go to "Continuing Emergency Notifications," EPIP-EOF-08.

##### 5.2 Event Notification (Using Primary Method, Dial Select)

- 5.2.1 Verify that any "Event Notice," Form EPIP-AD-07-01, received from the SM/ED/ERM has their approval signature, date, and time.
- 5.2.2 Pick up the Dial Select phone.
- 5.2.3 Verify the line is clear.
- IF someone is using the Dial Select line, THEN state that you have a "**PRIORITY 2**" notification. They will clear the line unless they have a "**PRIORITY 1**" call.
  - IF someone states they have a "**PRIORITY 1**" conversation, THEN acknowledge their priority and monitor the call until they finish.
- 5.2.4 WHEN the line is clear, Dial "**22**" (All Call for agencies to be notified).
- 5.2.5 IF the Dial Select system is not operating, THEN go to Step 5.3, Event Notification (Using Secondary Method, Commercial Phone).

##### **Note**

*Either Warning Center I or Warning Center II may respond. **Both are not** required to respond.*

- 5.2.6 WHEN each party acknowledges:
- Answer by stating: "**This is the Kewaunee Nuclear Plant - Please stay on the line for a Nuclear Accident Reporting System (NARS) message.**"
  - Record the time they respond on the "Event Notice," Form EPIP-AD-07-01 (upper left hand corner).

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5.2.7 IF after five (5) rings a party has not answered, THEN:

- a. Press the individuals Dial Select number from the table below.
- b. WAIT up to five (5) more rings, THEN press the “#” key to cancel ringing.

AGENCY	DIAL SELECT #
All Call	22
State Warning Center I or II	93 (I) and 83 (II)
Kewaunee County Sheriff Dispatch	13
Manitowoc County Sheriff Dispatch	54

5.2.8 IF unable to contact a specific agency, THEN continue with the notification of agencies on the line.

5.2.9 Using number and letter designations (Ref: “Phonetic Alphabet,” EPIP-APPX-A-1, Attachment 1-1.1), read aloud, **SLOWLY AND DELIBERATELY**, the message text (from “Message Start” to “Message End”) of the “Event Notice,” Form EPIPF-AD-07-01.

5.2.10 With all agencies remaining on the line, ask the State Warning Center person to **repeat** back the message.

5.2.11 IF required, contact agencies not responding to the Dial Select, THEN go to Step 5.3 below.

5.2.12 Go to Step 5.6, “Event Notice Verification Call Backs.”

5.3 Event Notification (Using Secondary Method, Commercial Phone)

AGENCY	COMMERICAL #
State Warning Center I or II	1 (800) 943-0003
Kewaunee County Sheriff	1 (920) 388-7108
Manitowoc County Sheriff	1 (920) 683-4200

5.3.1 UNLESS an agency is already notified using Dial Select, call each agency number in the order shown above.

5.3.2 WHEN the party answers, record the time on “Event Notice,” Form EPIPF-AD-07-01.

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5.3.3 Using number and letter designation (Ref: "Phonetic Alphabet," EPIP-APPX-A-1, Attachment A-1.1), read aloud **SLOWLY AND DELIBERATELY** the message text of the "Event Notice," Form EPIPF-AD-07-01.

5.3.4 UNTIL all agencies have been notified, repeat Steps 5.3.1 through 5.3.3.

#### 5.4 Notification of the ERO

5.4.1 IF the KNPP paging system is inoperable or unavailable, THEN go to Step 5.5.

5.4.2 Activate Radio Pagers

##### Note

*Any PBX telephone extension can be used to activate the pagers.*

##### Note

*To activate all of the pagers for Directors and select staff at an unusual event, you must repeat Steps 5.5.2.b through 5.5.2.g for the pager codes 9211 and 9222.*

- a. WHEN directed by the SM/ED/ERM, activate the radio pager codes selected.
  1. Check and/or enter the appropriate radio pager codes in Step "d."
  2. IF directed, enter the return phone number in Step "e," OR
  3. Check the appropriate event code in Step "e."
- b. Dial ext. "5213" on any WPSC PBX Telephone (extension xxxx).
- c. IF the PBX phone system is inoperable, THEN:
  - Dial "1-920-617-5213" from a Kewaunee (388-xxxx) or other non-Green Bay external telephone company exchange line, OR
  - Dial "617-5213" from any Green Bay (433-xxxx , 498-xxxx, etc.) external telephone company exchange, OR
  - Dial "9-1-920-617-5213" from a Centrex (431-xxxx) exchange located in the EOF.
- d. WHEN the phone answers and responds with a single (1) beep, dial the pager access code.
  - \_\_\_\_\_ "9233" - ALERT or HIGHER EVENT (All emergency pager holders), OR
  - \_\_\_\_\_ "9211" - UNUSUAL EVENT (Directors), AND
  - \_\_\_\_\_ "9222" - UNUSUAL EVENT (select staff), AND/OR
  - \_\_\_\_\_ "\_\_\_\_\_", "\_\_\_\_\_", "\_\_\_\_\_" - Other code(s) provided by the SM/ED/ERM.

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- e. WHEN the phone responds with three (3) beeps, dial the message code.  
     " \_\_\_\_\_ " - Phone number for return call, OR  
     \_\_\_\_\_ "66666" - UNUSUAL EVENT, OR  
     \_\_\_\_\_ "77777" - ALERT, OR  
     \_\_\_\_\_ "88888" - SITE EMERGENCY, OR  
     \_\_\_\_\_ "99999" - GENERAL EMERGENCY, OR  
     \_\_\_\_\_ "44444" - TERMINATION OR RECOVERY.
- f. Press the "#" key.
- g. WHEN the phone responds with five (5) beeps, hang up.
- h. IF another pager access code is to be activated, THEN return to Step 5.4.2.b.
- i. IF problems are encountered with KNPP paging system, THEN continue with Step 5.5.
- j. WHEN all pages have been completed, go to Step 5.6.

**Note**

*This step is used if the radio paging system is inoperable or significantly degraded on a Monday through Thursday, from 3:30 p.m. to 7:00 a.m., Friday 3:30 p.m. until Monday 7:00 a.m., and all day on Nuclear Management Company (NMC) holidays.*

**5.5 Alternate ERO Notification Method**

**Note**

*A Liaison should not accept responsibility for the ERO Call Tree unless they have immediate access to EPIP-APPX-A-02, "Response Personnel Call List."*

**Note**

*IF a Liaison does not accept the responsibility for an ERO Call Tree (Part "A" and/or Part "B"), THEN the communicators should implement that part of the Call Tree themselves.*

- 5.5.1 Call the following Liaisons in the order listed until two liaisons accept the ERO Call Tree responsibility.
  - a. Contact a Liaison from the list below and inform the Liaison that a(n) \_\_\_\_\_ (Unusual Event, Alert, Site Emergency, or General Emergency) was declared at \_\_\_\_\_ (time) and the ERO Call Tree Part "A" should be activated.

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- b. Contact a Liaison from the list below and inform the Liaison that a(n) \_\_\_\_\_ (Unusual Event, Alert, Site Emergency, or General Emergency) was declared at \_\_\_\_\_ (time) and the ERO Call Tree Part "B" should be activated.

The personal data contained in this step has been intentionally omitted from external copies of this document.

#### 5.6 Event Notice Verification Call Backs

- 5.6.1 Verify the bell switch for the Government verification phone at your station is ON.
- 5.6.2 Enter the current time in Step 11 of Form EPIPF-AD-07-01.
- 5.6.3 Monitor government verification lines for Call Backs.
- IF we have not received verification call backs from each of the off-site officials within 45 minutes from the time recorded on Step 11 of Form EPIPF-AD-07-01, THEN re-initiate the notification process for those officials by repeating Steps 5.2 or 5.3.
  - Answer all incoming calls on the Government Verification telephone.
  - WHEN calls are received, record caller name and time of call from State or Local Emergency Government Officials on the "Event Notice," Form EPIPF-AD-07-01 (bottom of page).
  - IF further information or verification is requested, THEN transfer calls coming from State or Local Emergency Government Officials or the State Radiological Coordinator to the SM/ED/ERM or his designee.
- 5.6.4 WHILE monitoring for call backs, proceed with Step 5.7.
- 5.6.5 WHEN call backs are complete, return Form EPIPF-AD-07-01 to the SM/ED/ERM who approved the Event Notice.

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#### 5.7 Point Beach Nuclear Plant Notification

5.7.1 Call the Point Beach Duty Shift Manager at (920) 755-6247.

5.7.2 WHEN the party answers, using the number and letter designations, read aloud the message text (from "Message Start" to "Message End") of the "Event Notice," Form EPIPF-AD-07-01.

#### 5.8 Institute of Nuclear Power Operations (INPO) Notification

5.8.1 Call the INPO Duty Officer at (800) 321-0614.

5.8.2 WHEN the party answers, read aloud the message text (from "Message Start" to "Message End") of the "Event Notice," Form EPIPF-AD-07-01.

5.8.3 Return to EPIP-AD-03, "KNPP Response to an Unusual Event," EPIP-AD-04, "KNPP Response to Alert or Higher," or EPIP-EOF-04, "EOF Staff Action for Alert or Higher," at the step you left that procedure.

#### **Note**

*IF access to Meridian Mail is delayed or problems are encountered when implementing procedure Step 5.9, THEN proceed with the pager activation's (Step 5.4.2) and return to Step 5.9 as time permits.*

#### 5.9 Record Message on Meridian Mail

#### **Note**

*Review Steps 5.9.1 through 5.9.15 and fill in the information in Step 5.9.7 before picking up telephone receiver.*

#### **Note**

*Any PBX extension can be used to access the Meridian Mail.*

5.9.1 Dial "1700" on any WPSC PBX Telephone (extension xxxx).

5.9.2 IF the PBX phone system is inoperable, THEN:

- Dial "1-920-433-1700" from any Kewaunee (388-xxxx) or other non-Green Bay external telephone company exchange line, OR
- Dial "433-1700" from any Green Bay (433-xxxx, 617-xxxx, etc.) external telephone company exchange, OR
- Dial "9-1-920-433-1700" from a Centrex (431-xxxx) exchange located in the EOF.

5.9.3 WHEN Meridian Mail answers, Dial "1580#115800#."

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5.9.4 WHEN acknowledged, Dial “82” (Greeting Maintenance).

5.9.5 WHEN acknowledged, Dial “3” (Temporary Greeting).

5.9.6 WHEN acknowledged, Dial “5” (Record External Greeting).

**Note**

*The information to complete the following greeting can be found on “Event Notice,” Form EPIPF-AD-07-01.*

5.9.7 **AT THE TONE**, record the following greeting:

“This is the Kewaunee Nuclear Power Plant. A(n) \_\_\_\_\_ (*enter event*) was declared at \_\_\_\_\_ (*time*) on \_\_\_\_\_ (*date*). Please report to your duty station immediately. I say again, please report to your duty station immediately.”

5.9.8 Dial “#” (Stop Recording).

5.9.9 Dial “2” (Review Greeting).

5.9.10 IF greeting is not the same as recorded in Step 5.9.7, THEN return to Step 5.9.4.

5.9.11 IF greeting is correct, THEN Dial “9” (expiration date and time).

5.9.12 Press “#” (default expiration month).

5.9.13 Press the number of tomorrows date and # (expiration day) (example, if today is October 4, then enter “5#”).

5.9.14 Press “0400#” (expiration time).

5.9.15 Press “83” (logoff) then hang up.

## 6.0 Final Conditions

- 6.1 The off-site notification implemented upon declaration of an event • **ESCALATION**, • **DE-ESCALATION**, • **CHANGE IN PAR**, • **TERMINATION**, or • **ENTRY INTO RECOVERY**, is complete.

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## 7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-APPX-A-1, Communication System Description
- 7.3 EPIP-APPX-A-02, Response Personnel Call List
- 7.4 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.5 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.6 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.7 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.8 EPIP-EOF-08, Continuing Emergency Notifications
- 7.9 Form EPIPF-AD-07-01, Event Notice (Wisconsin Nuclear Accident Reporting Form)

## 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.

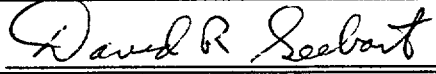
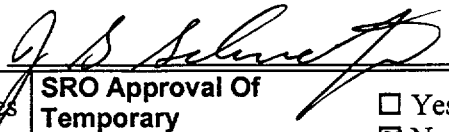
### 8.1.1 QA Records

- Event Notice (Wisconsin Nuclear Accident Reporting Form),  
Form EPIPF-AD-07-01

### 8.1.2 Non-QA Records

None



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		Reviewed By			
Approved By					
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 (SM)/Emergency Director (ED) and other initial response personnel for an appropriate response to a credible security threat specific to the Kewaunee Nuclear Power Plant (KNPP).

## 2.0 General Notes

- 2.1 The Hudson Security Command Post will be in operation at 715-377-3353 and will be the hub for security communication.
- 2.2 Security will provide a management individual to an appropriate location for coordination of 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 10CFR Part 20 limits (EPIP-AD-11).
  - 3.3.3 UNTIL the Emergency Response Manager (ERM) assumes the responsibility following EOF activation, recommendations of protective actions to off-site authorities (EPIP-AD-19).

## 4.0 Initial Conditions

- 4.1 This procedure shall be implemented upon declaration of a credible security threat LO or HI as determined by security procedures.

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## 5.0 Procedure

### Note

*If an Alert classification has been declared based on a HI credible security threat, site personnel are to be placed out of harms way as soon as possible. EOF and Joint Public Information Center (JPIC) are to be staffed and activated to ensure on-site and off-site communications are established.*

- 5.1 IF there is a HI security threat declare an ALERT as defined in EPIP-AD-02, "Emergency Class Determination Chart Q," THEN the SM/ED shall take the following actions:

- 5.1.1 Initiate an immediate personnel evacuation.

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

"Attention all personnel. Attention all personnel. We are experiencing an ALERT based on a credible security threat. Place all essential activities in a safe condition. All EOF personnel assemble at the EOF in Green Bay. All JPIC personnel report to the JPIC in Green Bay. The on-shift operations crew, STA, Radiation Technologist, Chemistry Technologist, and Emergency Director report to the Control Room. All other personnel shall evacuate the site."

- 5.1.2 Contact the Security Shift Captain/Site Protection Director and verify "Security Force Response to Emergencies," 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.

- 5.1.3 Complete the "Event Notice," Form EPIPF-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 greater than +2.4°F or Sigma Theta is less than 3.01°.

- 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.
- WHEN completing Part #9, check the following item:  
(A) None

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- 5.1.4 Direct the Notifier (NAO) to initiate notifications per "Initial Emergency Notifications," EPIP-AD-07, using the "Event Notice," Form EPIPF-AD-07-01, completed in Step 5.1.3.
- 5.1.5 Direct the Notifier (NAO) to activate pagers for appropriate emergency response personnel (group codes 9244, 9255) in accordance with EPIP-AD-07 Step 5.5. (See "Response Personnel Call List," EPIP-APPX-A-02, for individual pager codes.)
- 5.1.6 Direct the STA to implement "KNPP Response to Alert of Higher," EPIP-AD-04 Step 5.6, and notify the NRC.
- 5.1.7 Verify that Manitowoc and Kewaunee County Sheriff have been notified and informed that the EOF is being activated to coordinate communications.
- 5.1.8 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.
- 5.1.9 Log all significant events and actions.
- 5.1.10 Update facility EOF and JPIC directors as needed.
- 5.1.11 Ensure the overall emergency level is continually reviewed.

\_\_\_\_\_ Event Classification (EPIP-AD-02)

\_\_\_\_\_ PAR (EPIP-AD-19)

\_\_\_\_\_ Emergency Radiological Exposures (EPIP-AD-11)

- 5.1.12 IF the threat results in plant damage or a higher classification is appropriate and the security threat has not been mitigated, THEN continue to assess conditions and augment ERO when conditions change.
- 5.1.13 Determine the response status with an information collection brief. Include all of the following that are applicable:
- Off-site Notifications (EPIP-AD-07)
  - Plant Operations Status
  - Control Room support priorities
  - Status of Radiological Effluent Releases (potential off-site dose consequences)
  - Off-site Dose Assessment Evaluation

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- 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)
  - Removal of Visitors from site (i.e., fishermen) (EPIP-SEC-02)
  - Access Control
  - Significant Security Activities
- 5.1.14 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 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.
- 5.1.15 Verify the ERM has implemented "EOF Staff Action for Alert or Higher," EPIP-EOF-04.
- 5.1.16 Update the ERM on:
- 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., Security Events, fires, spills, personnel contamination, and personnel injuries)
- 5.1.17 If appropriate, plan for a shift relief per "Emergency Response Organization Shift Relief Guideline," EPIP-AD-05.
- 5.1.18 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.1.9.
- 5.1.19 WHEN Final Conditions (Section 6.0) are met, THEN go to EPIP-AD-04 Step 5.2.16.

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**Note**

*If an Unusual Event classification has been declared based on an LO credible security threat, site personnel are to be placed out of harms way as soon as possible. EOF and JPIC are to be staffed and activated to ensure on-site and off-site communications are established.*

- 5.2 **IF** there is an LO security threat declare an UNUSUAL EVENT as defined in EPIP-AD-02, "Emergency Class Determination Chart Q," **THEN** the SM/ED shall take the following actions:

- 5.2.1 Initiate an immediate personnel evacuation.

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

"Attention all personnel. Attention all personnel. We are experiencing an UNUSUAL EVENT based on a credible security threat. Place all essential activities in a safe condition. All EOF personnel assemble at the EOF in Green Bay. All JPIC personnel report to the JPIC in Green Bay. The on-shift operations crew, STA, Radiation Technologist, Chemistry Technologist, and Emergency Director report to the Control Room. All other personnel shall evacuate the site."

- 5.2.2 Contact the Security Shift Captain/Site Protection Director and verify "Security Force Response to Emergencies," 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.

- 5.2.3 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 greater than +2.4°F or Sigma Theta is less than 3.01°.
- **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.
  - **WHEN** completing Part #9, check the following item:  
(A) None

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- 5.2.4 Direct the Notifier (NAO) to initiate notifications per EPIP-AD-07 using the "Event Notice," Form EPIPF-AD-07-01, completed in Step 5.1.3.
- 5.2.5 Direct the Notifier (NAO) to activate pagers for appropriate emergency response personnel (group codes 9244, 9255) in accordance with EPIP-AD-07 Step 5.5. (See "Response Personnel Call List," EPIP-APPX-A-02, for individual pager codes.)
- 5.2.6 Direct the STA to implement "KNPP Response to an Unusual Event," EPIP-AD-03 Step 5.5, and notify the NRC.
- 5.2.7 Verify that Manitowoc and Kewaunee County Sheriff have been notified and informed that the EOF is being activated to coordinate communications.
- 5.2.8 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.
- 5.2.9 Log all significant events and actions.
- 5.2.10 Update facility EOF and JPIC directors as needed.
- 5.2.11 Ensure the overall emergency level is continually reviewed.

\_\_\_\_\_ Event Classification (EPIP-AD-02)

\_\_\_\_\_ PAR (EPIP-AD-19)

\_\_\_\_\_ Emergency Radiological Exposures (EPIP-AD-11)

- 5.2.12 IF the threat results in plant damage or a higher classification is appropriate and the security threat has not been mitigated, THEN continue to assess conditions and augment ERO as conditions change.
- 5.2.13 IF the threat is upgraded to HI or results in plant damage or a higher classification is appropriate, AND the security threat has NOT been mitigated, go to Step 5.1.
- 5.2.14 Determine the response status with an information collection brief. Include all of the following that are applicable:
- Off-site Notifications (EPIP-AD-07)
  - Plant Operations Status
  - Control Room support priorities
  - Status of Radiological Effluent Releases (potential off-site dose consequences)

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

5.2.15 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 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.

5.2.16 Verify the ERM has:

- Assessed personnel needed in the EOF and JPIC, THEN released unnecessary personnel
- Implemented "EOF Staff Action for Unusual Event," EPIP-EOF-03
- Coordinated with Nuclear Management Company (NMC) headquarters management personnel
- Determined what essential activities should proceed
- Made arrangements for appropriate personnel to continue activities determined essential

5.2.17 Update the ERM on:

- 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., Security Events, fires, spills, personnel contamination, and personnel injuries)

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

5.2.19 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.2.9.

5.2.20 WHEN Final Conditions (Section 6.0) are met, THEN go to EPIP-AD-04 Step 5.2.16.

## 6.0 Final Conditions

6.1 The Security Threat has been mitigated and it is safe for personnel to return to the plant.

## 7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 10CFR50.72(c)(3), Maintaining open communications with the NRC
- 7.3 EPIP-AD-02, Emergency Class Determination
- 7.4 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.5 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.6 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.7 EPIP-AD-07, Initial Emergency Notifications
- 7.8 EPIP-AD-11, Emergency Radiation Controls
- 7.9 EPIP-AD-18, Potassium Iodide Distribution
- 7.10 EPIP-AD-19, Protective Action Guidelines
- 7.11 EPIP-EOF-03, EOF Staff Action for Unusual Event
- 7.12 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.13 EPIP-EOF-08, Continuing Emergency Notifications
- 7.14 EPIP-SEC-02, Security Force Response to Emergencies
- 7.15 EPIP-SEC-05, Personnel Evacuation
- 7.16 EPIP-APPX-A-02, Response Personnel Call List
- 7.17 EPIP-APPX-A-03, Off-Site Telephone Numbers
- 7.18 Form GNP-11.04.04-1, Event Notification Worksheet



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- 7.19 Form EPIPF-AD-07-01, Event Notice
- 7.20 Form EPIPF-AD-07-02, State Call-Back - Question Guideline
- 7.21 Figure EPIPFG-APPX-A-02-01, ERO Call Tree
- 7.22 NMC SE-0018, Security Threat Assessment
- 7.23 NMC SE-0017, Security Threat Notification
- 7.24 E-0-08, Security Events

## 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

<b>WISCONSIN PUBLIC SERVICE CORP.</b>  <b>Kewaunee Nuclear Power Plant</b>  <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-EOF-11	Rev.	U
		Title	Internal Communication and Documentation Flow		
		Date	NOV 15 2001	Page 1 of 3	
Reviewed By <i>Jeanne M. Ferris</i>		Approved By <i>David R. Seebart</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 flow of information and documentation through the EOF and how it will be maintained.

## 2.0 General Notes

- 2.1 Generally each EOF position should maintain the logs, records, and documents generated by them at their station until the ALD arranges for long-term storage.

## 3.0 Precautions and Limitations

- 3.1 All logs, records, and documents generated over the course of the emergency shall be kept until after emergency reviews or investigations of the emergency are complete.

## 4.0 Initial Conditions

- 4.1 This procedure will be implemented when an emergency has been declared at the Kewaunee Nuclear Power Plant and it is directed by the Administrative Logistics Director.

## 5.0 Procedure

### 5.1 Maintaining Status Boards and Event Sheets - EOF Support Personnel

- 5.1.1 Update the EOF status boards approximately every 15 minutes or as directed by the ALD.

#### **Note**

*IF the Honeywell terminal is not operational, THEN use the Forms found in Appendix B of the EPIPs and complete them by obtaining the information from the EOF Communicator in the TSC. The Forms are:*

- *Form EPIPF-EOF-11-02, "Operating Status"*
- *Form EPIPF-EOF-11-03, "Environmental Status Board"*

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5.1.2 Print Honeywell terminal screens that match the EOF status boards from the Honeywell terminal under the following "Graphic Display" screen addresses:

- #53 - Operating Status
- #54 - Environmental Status

5.1.3 Transcribe the data obtained from the screens to the appropriate EOF status boards.

5.1.4 Place the printouts in the EOF Support Personnel's OUT box for filing.

5.1.5 Transcribe information that is marked "POST" by the Engineering/Licensing Support Coordinator to the appropriate status board or Flip Chart sheet.

5.1.6 Provide recommendations to the Engineering/Licensing Support Coordinator to post any other significant plant or ERO activities/events.

5.1.7 Number each Flip Chart sheet.

## 5.2 Distributing New Messages - EOF Support Personnel

5.2.1 Distribute To Addressee:

- a. IF action is required, THEN hand it directly to the addressee who needs to take the action.
- b. IF the information is for informational purposes, THEN place it in the addressee's IN box.

5.2.2 Pick up all messages from all OUT boxes:

- a. Messages from EOF staff members should be placed in the ERM's IN box.
- b. Messages from the ERM's OUT box that are marked "POST" should be placed in the IN box of the Support Person maintaining the status boards (Step 5.1).
- c. Other messages from the ERM's OUT box should be placed in the IN box of the Support Person generating the Master Log.
- d. Messages that have been posted should be placed in the IN box of the Support Person generating the Master Log (Step 5.3).

## 5.3 Master Log - EOF Support Personnel

5.3.1 Collect all "News Statements" and make a copy for each clip board.

5.3.2 Create an electronic master log.

5.3.3 Enter all messages in the "Master Log" chronologically.

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- 5.3.4 After a full log page is generated or every 30 minutes,
- Make 4 copies of the last log page and latest news statements,
  - Two-hole punch them at the top, AND
  - Deliver to the IN boxes of the: ERM, SRCL, NRC, State.

5.3.5 Place the originals of all messages in a master file.

## 6.0 Final Conditions

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

## 7.0 References

- 7.1 None

## 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

- Operating Status, Form EIPF-EOF-11-02
- Environmental Status Board, Form EIPF-EOF-11-03
- Flip Chart sheets
- Personal and Master Logs

### 8.1.2 Non-QA Records

None

**EVENT NOTICE**  
**(Wisconsin Nuclear Accident Reporting Form)**

ROLL-CALL \_\_\_\_\_ TIME \_\_\_\_\_  
State Warning Center I or II \_\_\_\_\_  
Kewaunee Co. Sheriff \_\_\_\_\_  
Manitowoc Co. Sheriff \_\_\_\_\_

**"MESSAGE START"**

"THIS IS ☐ an ACTUAL EVENT ☐ a DRILL (check one)."

"This is the Kewaunee Nuclear Power Plant calling. An incident has occurred at our facility. Please record the following information on your Nuclear Accident Reporting System form."

<b>1. STATUS</b> (Use both A&D to Declare & Terminate at the same time) <input type="checkbox"/> A Actual <input type="checkbox"/> B Exercise <input type="checkbox"/> C Drill <input type="checkbox"/> D Termination	<b>2. STATION/PLANT</b> <input type="checkbox"/> (S) Kewaunee	<b>3. ON-SITE ACCIDENT CLASSIFICATION</b> <input type="checkbox"/> (A) Unusual Event <input type="checkbox"/> (B) Alert <input type="checkbox"/> (C) Site Area Emergency <input type="checkbox"/> (D) General Emergency <input type="checkbox"/> (E) Recovery <input type="checkbox"/> (F) Not Applicable												
<b>4. ACCIDENT</b>  CLASSIFIED      TERMINATED  TIME: _____ TIME: _____ DATE: _____ DATE: _____  EAL Chart: _____	<b>5. RELEASE TO ENVIRONMENT</b>  <input type="checkbox"/> (A) None <input type="checkbox"/> (B) Potential <input type="checkbox"/> (C) Occurring <input type="checkbox"/> (D) Terminated	<b>6. TYPE OF RELEASE</b>  <input type="checkbox"/> (A) Not Applicable  <input type="checkbox"/> (B) Radioactive Gas  <input type="checkbox"/> (C) Radioactive Liquid												
<b>7. WIND DIRECTION</b> FROM _____ (degrees) Downwind Sector (Circle One Sector) A B C D E F G H J K L M N P Q R	<b>8. WIND SPEED</b> <input type="checkbox"/> (B) Miles/HR _____													
<b>9. RECOMMENDED ACTIONS</b> <input type="checkbox"/> (A) NONE  <table style="width: 100%;"><tr><td style="text-align: center;"><u>EVACUATE</u></td><td style="text-align: center;"><u>SECTORS</u></td></tr><tr><td><input type="checkbox"/> (B)</td><td>0-2 mile radius</td></tr><tr><td><input type="checkbox"/> (C)</td><td>0-5 mile radius</td></tr><tr><td><input type="checkbox"/> (D)</td><td>2-5 miles for sectors _____</td></tr><tr><td><input type="checkbox"/> (E)</td><td>5-10 miles for sectors _____</td></tr><tr><td><input type="checkbox"/> (F) other</td><td></td></tr></table>	<u>EVACUATE</u>	<u>SECTORS</u>	<input type="checkbox"/> (B)	0-2 mile radius	<input type="checkbox"/> (C)	0-5 mile radius	<input type="checkbox"/> (D)	2-5 miles for sectors _____	<input type="checkbox"/> (E)	5-10 miles for sectors _____	<input type="checkbox"/> (F) other		<b>10. OTHER SIGNIFICANT INFORMATION</b>	
<u>EVACUATE</u>	<u>SECTORS</u>													
<input type="checkbox"/> (B)	0-2 mile radius													
<input type="checkbox"/> (C)	0-5 mile radius													
<input type="checkbox"/> (D)	2-5 miles for sectors _____													
<input type="checkbox"/> (E)	5-10 miles for sectors _____													
<input type="checkbox"/> (F) other														

11. This message is being transmitted by \_\_\_\_\_ (name) at the Kewaunee Nuclear Power Plant.  
The return phone number is (920) 388-0101.

"State Warning Center, please read back this message to verify accuracy." (PAUSE to allow message to be read)  
"Have all agencies received this message?" (WAIT for reply)  
"Relay this information to Emergency Management immediately. Have the appropriate personnel verify this message by return phone call."

**"MESSAGE END"** NOTE: Message transmission was complete at \_\_\_\_\_ (Time).

Signature \_\_\_\_\_ DATE / TIME APPROVED \_\_\_\_\_  
Approved Prior to Release by ☐ ED ☐ ERM (Check One)

<u>Verification</u>	State of Wisconsin (Duty Officer) _____	Time _____
<u>Call Backs</u>	Manitowoc Cnty (Emerg Gov Dir) _____	Time _____
	Kewaunee Cnty (Emerg Gov Dir) _____	Time _____

**NOTE: RETURN THIS FORM TO THE SM/ED/ERM UPON COMPLETION OF CALL BACKS.**

# EVENT NOTICE

## Completion Instructions

(NOTE: *This side not to be transmitted by fax*)

- Roll-Call Area - Provides a quick check-off when off-site dispatchers pickup for a notification call.
- Box "Message Start" - The words "an Actual Event" OR "a Drill" should be clearly circled. This is the opening statement to be made by the Notifier or Communicator when all off-site recipients are available on the line.
- Box #1 - Blacken or check the appropriate circle. This box denotes whether the event is a real event, a simulated event, or the termination of an event. For actual events, both A & D may be checked if the event is terminated prior to declaration and notification. In this case, 2 times and dates must be included in box #4.
- Box #2 - Only one option here for us. The State form has all other plants listed.
- Box #3 - Blacken or check the appropriate circle for the appropriate event that is being communicated.
- Box #4 - This is a Two-Part box. Each part must be completed with the time and date the event level was positively identified. The "EAL Chart" letter will aid the State technical people review our classification criteria. Each part may be used separately or together if an event has a short duration such that the EAL parameter is exceeded and immediately removed. Therefore, the event may be such that the EAL parameter is exceeded and immediately removed. Therefore, the event may be initiated and terminated all in the same event notice. In this case, both A & D should be checked in box #1.
- Box #5 - Blacken or check the appropriate circle based on the information available at the time. This box provides a quick status of the radiological release impact of the event being experienced.
- Box #6 - Blacken or check the appropriate circle based on what is known about the type of radiological release that is in progress, has the potential to occur, or has terminated.
- Box #7 - Write in the 10-meter wind direction directly off of the plant monitors. Determine the "ONE" downwind sector to which the wind direction instrument reading is pushing the plume. Choose the sector letter that falls between the instrument wind direction in degrees below.
- |    |      |    |      |     |       |     |       |     |       |     |       |     |       |     |       |    |
|----|------|----|------|-----|-------|-----|-------|-----|-------|-----|-------|-----|-------|-----|-------|----|
| 11 | 33.5 | 56 | 78.5 | 101 | 123.5 | 146 | 168.5 | 191 | 213.5 | 236 | 258.5 | 281 | 303.5 | 326 | 348.5 | 11 |
| K  | L    | M  | N    | P   | Q     | R   | A     | B   | C     | D   | E     | F   | G     | H   | J     |    |
- Box #8 - Blacken or check the circle and write in the 10 - meter wind speed.
- Area #9 - Blacken or check the circle as directed by procedures EPIP-AD-03 or EPIP-AD-04 or EPIP-AD-19.
- Area #10 - This space should be completed with a "BRIEF" statement on the nature of the event. The EAL Chart title from box #4 may be adequate. Avoid the use of acronyms.
- Area #11 - The person transmitting this information should write in their name and read the statement. After the read back by the state, enter the time message transmission was completed.
- Box "Message End" - This is the closing statement and the point at which we request the State to "Repeat Back" the information transmitted. This provides a second check by all parties to ensure accuracy.
- Approval - Notifies and Communicators "MUST NOT" transmit any event notice "UNLESS" an ED or ERM has signed, dated and timed the approval of the information.
- Verification Call Backs - Record the "name" of the state or county official and the "time" at which that official calls back to verify the emergency declaration is valid. After the State and county dispatchers hand up, they will contact their respective duty officers. These duty officers will then call back to the plant using the "Government Verification Phone" line to verify the declaration and possibly ask for more information.

## STATE CALL-BACK - QUESTION GUIDELINE

AREA OF CONCERN	KNOWN INFORMATION
What were the plant conditions that lead to the event?	
Are plant conditions improving or degrading?	
Are Classification or PAR changes being considered?  If yes, what?	
What safety related equipment is out-of-service?	
What critical safety path is being followed (function and color)?	
Has there been a change in the status of radiological release since the initial notice?	
What is the current wind direction and speed (10-meter tower)?	

# OPERATING STATUS

Date \_\_\_\_\_ Event Class \_\_\_\_\_ Time Declared \_\_\_\_\_

RX TRIP TIME \_\_\_\_\_

RCS/CORE	PRIMARY COOLING	EMERGENCY SYSTEMS
TIME _____	TIME _____	TIME _____
TEMP      "A"      "B"	S/G      "A"      "B"	HPSI _____
HLG      °F      °F	LVL      %      %	FLOW      gpm
CLG      °F      °F	PRESS      psig      psig	LPSI (RHR) _____
PRESS      psig	AFW	FLOW      gpm
PZR LVL      %	FLOW      gpm      gpm	RWST LVL      %
MAX T/C      °F	STM	<u>CONTAINMENT</u>
CNMT. RAD _____	RELIEF <u>COND/ATM</u>	PRESS      psig
MONITOR _____	RCP      "A"      "B"	TEMP      °F
EST. FUEL	STATUS <input type="checkbox"/> YES <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NO	WTR LVL      ft
DAMAGE      %	RHR	SPRAY <input type="checkbox"/> YES <input type="checkbox"/> NO
	RECIRC <input type="checkbox"/> YES <input type="checkbox"/> NO	
	COOLDOWN <input type="checkbox"/> YES <input type="checkbox"/> NO	

## PERSONNEL INFORMATION

Have plant personnel been accounted for?      ☐ YES      ☐ NO

How many plant personnel remain on-site? \_\_\_\_\_

Any injuries?      ☐ YES      ☐ NO      Extent of injuries? \_\_\_\_\_

Fire Location \_\_\_\_\_ Extent of damage \_\_\_\_\_

Cause \_\_\_\_\_ Who fought fire?      ☐ Plant Fire Team      ☐ Local Fire Dept

LEVEL OF EMERGENCY      ☐ Unusual Event      ☐ Alert      ☐ Site Emergency      ☐ General Emergency



## ENVIRONMENTAL STATUS BOARD

**WEATHER:**      TIME: \_\_\_\_\_

	10 M	60 M	
Wind Direction From			deg.
Wind Speed			mph
Temperature		N/A	°F

Stability Class   ☐ A   ☐ B   ☐ C   ☐ D   ☐ E   ☐ F   ☐ G

Delta T \_\_\_\_\_ °F      Sigma Theta \_\_\_\_\_ deg.

Lake Breeze: ☐ YES   ☐ NO      Path: ☐ North   ☐ South

Forecast:

**RELEASE:**      TIME: \_\_\_\_\_

Radiological Release in Progress:   ☐ YES   ☐ NO

Start Time: \_\_\_\_\_

Release Path:   ☐ Aux Vent   ☐ Cnmt Vent   ☐ Stm Rlf A   ☐ Stm Rlf B   ☐ Other

Estimated Duration: \_\_\_\_\_ Hours

Release Rate \_\_\_\_\_ CI/SEC

Iodine Fraction: \_\_\_\_\_

### PROJECTED DOSE:

Miles	2	5	10
TEDE			
Limiting Organ Dose			