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

November 29, 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 (EIPs). 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
01/14/02

KEWAUNEE NUCLEAR POWER PLANT

November 29, 2001

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

RETURN TO DIANE FENCL - KNPP

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T. Webb - NRC Resident Inspector (4) (receives Appx. A phone numbers)*	
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T. Webb - KNPP QA Vault w/NRC Letter (15)*	

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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)
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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 29, 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 Fencil by December 31, 2001, SIGNED AND DATED to serve as a record of revision.

EPIP Index, dated 11-29-2001.

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-EOF-02	Y	EPIP-EOF-02	Z
EPIP-OSF-02	S	EPIP-OSF-02	T
EPIP-RET-02A	S	EPIP-RET-02A	T
EP-RET-3A	K	EPIP-RET-03A	L
EPIP-TSC-02	R	EPIP-TSC-02	S

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 FENCIL**.

C. S. for
Diane Fencil

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
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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-3G	Manual Dose Projection Calculation	Deleted	06-02-89
EP-ENV-3H	Protective Action Recommendations	Deleted	04-13-90
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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-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
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EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
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EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
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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-EOF-12 Form EPIPF-EOF-02-01	EP-FIG-009	EOF-12-01	Division Office Building (2nd Floor) Floor Plan	B	10-24-2000
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EOF-08-03	Fax for Emergency Declaration or Status Updates	G	11-27-2001
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RET 2B.2	Auxiliary Building Stack (Grab Sample)	C	04-16-96
RET 2B.3	Auxiliary Building Stack (Sping Reading)	C	04-16-96
RET 2B.4	Containment Stack (Sping Reading)	B	04-16-96
RET 2B.5	Steam Release	C	04-16-96
RET 2B.6	Field Reading (Grab Sample)	A	04-16-96
RET-04-01	SAM-2 Counting Equipment Worksheet	E	06-12-2001
RET 8.3	Hospital Survey 1	Deleted	06-05-2001
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TSC-04-01	Emergency Physical Change Request	F	08-29-2000
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TSC-07-01	Head Venting Calculation	F	10-31-2000
TSC 8A.1	Steam Release Data Sheet (Energy Balance)	G	02-14-95
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TSC 8A.3	Steam Release Data/Calculation Sheet (Open Valve)	D	02-14-95
TSC 8A.4	Steam Release Data/Calculation Sheet (STMRLS Program)	C	04-16-96
TSC 9A.1	Core Damage Based on Reactor Vessel Level & Fuel Rod Temp.	C	02-14-95
TSC 9A.2	Core Damage Based on Radiation Monitors	C	02-14-95
TSC 9A.3	Cs-134 and Cs-137 PCF Determination	D	04-16-96
TSC 9A.4	Core Damage Based on Activity Ratios	C	02-14-95
TSC 9A.5	Core Damage Assessment (Monitoring Data)	D	04-16-96
TSC 9A.6	Core Damage Summary	C	02-14-95

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant		No.	EPIP-EOF-02	Rev.	Z
		Title	Emergency Operations Facility (EOF) Activation		
<i>Emergency Plan Implementing Procedure</i>		Date	NOV 29 2001	Page 1 of 3	
Reviewed By <u>T. Ashley</u>		Approved By <u>David R. Leebart</u>			
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 activating the Emergency Operations Facility (EOF).

2.0 General Notes

- 2.1 Telephone numbers and location of staff positions for the EOF are located in EPIP-APPX-A-06, "KNPP Emergency Response Facility Telephone Numbers."
- 2.2 A general description of communications equipment is contained in APPX-A-1, "Communication System Description," and may be helpful in resolving minor problems with the equipment.

3.0 Precautions and Limitations

- 3.1 If any of the actions on Form EPIPF-EOF-02-01, "EOF Activation Checklist," cannot be satisfied in a reasonable period of time, then the problem shall be noted on Form EPIPF-EOF-02-01 and a Kewaunee Assessment Process (KAP) initiated at the next convenient opportunity. Consideration of activation should not be delayed for problems with individual actions on Form EPIPF-EOF-02-01.
- 3.2 The Emergency Response Manager (ERM) will make the decision whether the EOF can be activated prior to resolution of problems.
- 3.3 If it becomes necessary to evacuate or relocate the EOF, the ERM should utilize the guidance supplied in Section 5.2 to assist in transferring the functionality of the EOF to an alternate facility.

4.0 Initial Conditions

- 4.1 The EOF shall be activated for an Alert, Site Emergency, General Emergency, or at the discretion of the ERM.
- 4.2 The Administrative and Logistics Director (ALD) shall assign and complete actions necessary to activate the EOF in accordance with this procedure.

5.0 Procedure

5.1 Activation

- 5.1.1 Complete Form EPIPF-EOF-02-01, "EOF Activation Checklist."

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5.1.2 IF communications or PC equipment problems are identified, THEN contact WPSC Information Technologies Service (ITS) at 7200 (after hours 7255) OR one of the telephone assistance numbers listed in EPIP-APPX-A-06 AND state the following:

- Telephone number or system with the problem
- The nature of the problem
- That emergency service is needed

5.1.3 WHEN Form EPIPF-EOF-02-01, "EOF Activation Checklist," (Items 1 through 4) is completed, give the form to the ERM for review and signature.

5.2 EOF Evacuation/Relocation

5.2.1 IF it becomes necessary to evacuate or relocate the EOF, THEN the ERM should consider the following in order to maintain the functionality of the EOF:

- EOF Dose Assessment and Protective Action Recommendations may be formulated in the TSC
- Command and control of Environmental Monitoring Teams may be transferred to the TSC
- NRC and State and County communications may be handled from the TSC
- The ERM may reposition to the TSC or the Point Beach EOF in the Point Beach Site Boundary Command Center

5.3 Deactivation

5.3.1 WHEN final conditions are met, complete Form EPIPF-EOF-02-02, "EOF Deactivation Checklist."

5.3.2 WHEN Form EPIPF-EOF-02-02 is completed, give the form to the ERM for review and signature.

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 EPIPs.

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7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 APPX-A-1, Communication System Description
- 7.3 EPIP-APPX-A-06, KNPP Emergency Response Facility Telephone Numbers
- 7.4 COMTRAK 88-169, Title Markers for the EOF Staff

8.0 Records

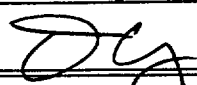
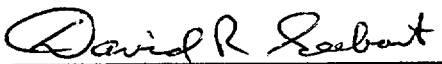
- 8.1 The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

- Form EPIPF-EOF-02-01, EOF Activation Checklist
- Form EPIPF-EOF-02-02, EOF Deactivation Checklist

8.1.2 Non-QA Records

None

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		Reviewed By	 T. ASHLEY		
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 Operational Support Facility (OSF) Staff when responding to an **Alert, Site Emergency, or General Emergency**.

2.0 General Notes

- 2.1 None

3.0 Precautions and Limitations

- 3.1 Ensure accountability of personnel and OSF Staff reporting to the OSF is maintained throughout the incident (See "Personnel Assembly and Accountability," EPIP-SEC-03) via the Technical Support Center (TSC) Area Accountability Coordinator.
- 3.2 A radiation survey of designated OSF assembly area or use of a portable radiation monitoring instrument for verification of habitability will be performed per "TSC and OSF Activation Checklist," Form EPIPF-TSC-02-01.
- 3.3 If it becomes necessary to evacuate the designated OSF assembly area, then a minimum staff will be maintained in the lower TSC. Additional OSF support personnel will be evacuated per "Personnel Evacuation," EPIP-SEC-05.
- 3.4 If it becomes necessary to evacuate or relocate the TSC and the OSF, then use the guidance in Section 5.5 to assist in relocating the personnel and functionality of the OSF.

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 (SM) or Emergency Director (ED).

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5.0 Procedure

5.1 Fire Team and Repair Team Accountability

5.1.1 Fire Team

- a. IF you have not been notified that a fire exists, THEN proceed to your assigned Turn Out Gear location.
 - Report the team member names to the SM or Event Operations Director (EOD).
 - Upon completion of initial accountability, if the Fire Team is not required, report to Accountability Location as follows:
 1. Admin. Team to ATF-1 Accountability Location
 2. Annex Team to Warehouse Accountability Location
- b. IF you have been notified that a fire exists, THEN:
 - Upon hearing the plant siren, assemble and account at your Turn Out Gear Lockers (Admin. and Annex).
 - If time permits, one team member should locate the nearest Gai-tronics, telephone, or portable radio, and report the names and locations of the fire team members to the SM or EOD.
 - Respond to the fire keeping the SM or EOD informed of your actions.
- c. During subsequent soundings of the plant alarm:
 - IF you are in the field investigating or fighting a fire, THEN do NOT report to an Accountability Location.
 - IF time permits, THEN one team member should locate the nearest Gai-tronics, telephone, or portable radio and report the names and locations of the team members to the SM or EOD.
 - IF time does not permit, THEN proceed with your emergency duty regardless of accountability concerns.

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5.1.2 ERO Repair Teams

- a. IF you have not been contacted by the SM, Support Activity Director (SAD), or a Maintenance Supervisor in regards to performing an emergency duty, THEN proceed to the OSF upon hearing the plant siren.
- b. IF you have been contacted by the SM, SAD, or Maintenance Supervisor and have been instructed to (1) perform an emergency duty, (2) report to the OSF, or (3) report to another area in response to the emergency (e.g., obtain equipment or tools), THEN:
 - Upon hearing the plant siren, locate the nearest Gai-tronics or telephone and contact the SM, SAD, or Maintenance Supervisor (whomever contacted you) to report your location.
 - IF you are continuing on to another area, THEN inform this person.
 - Continue with your emergency duty as instructed.
- c. During subsequent soundings of the plant alarm, if you are in the field performing an emergency duty:
 - Do NOT report to an Accountability Area.

Note

IF you are actually required to leave the area, THEN the OSF Coordinator will inform you.

- Locate the nearest Gai-tronics or telephone and report your location to the OSF Coordinator.

5.2 OSF Coordinator

5.2.1 WHEN notified that an Emergency has been declared:

- a. Report to the OSF.
- b. IF an OSF Coordinator has been designated, until released, THEN assist the designated OSF Coordinator.
- c. IF an OSF Coordinator has NOT been designated, THEN notify the SAD of your intent to assume the responsibilities of the OSF Coordinator and continue implementation of this procedure.

5.2.2 Notify the SAD of your assumption of the responsibilities of the OSF Coordinator.

5.2.3 Obtain the ERO Response binder from the "TSC Material Locker."

5.2.4 Verify an OSF Support Person is available to implement Step 5.3 of this procedure or assign another OSF staff member to this task.

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- 5.2.5 Direct an OSF Assembly Area Staff Member to:
- Develop a list of OSF personnel resources by name and emergency duty position.
 - If required, serve as Accountability Coordinator to maintain personnel accountability.
 - Relay briefings during the course of the event.
- 5.2.6 Ensure that each work group (i.e., electrical, mechanical, I&C) has a designated Maintenance Group Supervisor present.
- 5.2.7 Notify additional support personnel as needed, using the telephone numbers listed in "Response Personnel Call List," EPIP-APPX-A-02.
- 5.2.8 Obtain and maintain knowledge of "work in progress" and "work to be performed" upon arrival at the OSF and throughout the event.
- Note**
Both the OSF and the TSC "High Priority Work" status boards must be in unison.
- Post the jobs actually in progress with the priority (No. 1-7) assigned by the ED on the "High Priority Work" status board.
 - Post the jobs awaiting team assignment on the "Lower Priority Work" status board.
- 5.2.9 Provide updates to the OSF Support Person, SAD, and TSC Data Coordinator as needed, to maintain the "High Priority" and "Lower Priority" status boards current.
- 5.2.10 Brief the OSF Staff periodically on priority and pending work.
- 5.2.11 Ensure an OSF Event Log of all significant events and actions is maintained. Including as a minimum:
- Date
 - Time
 - Significant Event/Action
 - Name of person information was received from or sent to
 - Initials of person making log entry
- 5.2.12 Assist the SAD as required for evaluation of equipment and material necessary to support the emergency response organization.
- 5.2.13 Assist the SAD in the review of work requests and the planning and scheduling of work as required.

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- 5.2.14 Implement emergency repair and modifications on plant equipment and systems as directed by the SAD in accordance with "Work Requests During an Emergency," EPIP-OSF-03.
 - a. Ensure pre-job briefings are conducted using "Operational Support Facility Team Briefing" Form EPIPF-OSF-03-01.
- 5.2.15 Implement search and rescue operations as directed by the SAD in accordance with EPIP-OSF-04.
- 5.2.16 Provide manpower, equipment, and material necessary to support the emergency organization.
- 5.2.17 Support accountability of OSF staff members through the designated Accountability Coordinator in the TSC.
- 5.2.18 If appropriate, plan a shift relief for OSF Support Personnel per "Emergency Response Organization Shift Relief Guideline," EPIP-AD-05.
- 5.2.19 IF Final Conditions (Section 6.0) have NOT been met, THEN return to Step 5.2.8.
- 5.2.20 WHEN Final Conditions are met (Section 6.0):
 - 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 forms, notes, and other documentation and give them to the TSCD.

5.3 OSF Support Person

- 5.3.1 WHEN notified that an Emergency has been declared:
 - a. Report to the OSF.
 - b. IF an OSF Support Person has been designated, until released, THEN assist the designated OSF Support Person.
 - c. IF an OSF Support Person has NOT been designated, THEN notify the OSF Coordinator of your intent to assume the responsibilities of the OSF Coordinator and continue implementation of this procedure.
- 5.3.2 Ensure that there are copies of "Operational Support Facility Team Briefing," Form EPIP-OSF-03-01, are available.
- 5.3.3 Maintain OSF Status Boards as directed by the OSF Coordinator.
- 5.3.4 Maintain an "OSF Event Log" of significant events, announcements, and OSF Coordinator priorities.

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5.3.5 Record incoming and outgoing ad hoc telephone messages on "Telephone Communications Log Sheet," Form EPIPF-EOF-04-02.

5.3.6 Inform the OSF Coordinator promptly of information received from maintenance teams in the field or other support organizations.

5.3.7 When requested, make document copies.

5.4 Operations Staff Support

5.4.1 Operations Staff reporting to the OSF may be needed to support the Control Room or the OSF. Priority should be given to the Control Room for the use of their time.

5.4.2 Operations Staff in the OSF may be asked to provide support for:

!! Caution !!

To Prevent Injury or Death

The dispatch of Operations Personnel from the OSF must be coordinated between the EOD and the ED to prevent conflicting or redundant assignments. SROs in the OSF need to make sure that they do not compromise the decisions or priorities of the on-shift Shift Manager.

- a. Tag-out preparation.
- b. System and component location information.
- c. Work package preparation.
- d. Direct assignment to maintenance repair teams.

5.5 IF it becomes necessary to relocate or evacuate the OSF/TSC, THEN the following guidance should be utilized to maintain the functionality of the OSF:

- a. OSF Assembly Area personnel should be relocated with the guidance and direction of the Radiological Protection Director (RPD) and may be concurrent with the relocation of the Radiological Assessment Facility.
- b. The OSF Coordinator should relocate with the OSF Assembly Area and establish and maintain communications with the Support Activities Director.
- c. Team tracking and logging activities should be maintained and continued at the new OSF location in accordance with Section 5.2.

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 EPIP Appendix A, Communications
- 7.3 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline
- 7.4 EPIP-OSF-03, Work Requests During an Emergency
- 7.5 EPIP-OSF-04, Search and Rescue
- 7.6 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.7 EPIP-SEC-05, Personnel Evacuation
- 7.8 EPIP-TSC-02, Technical Support Center Activation

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

- OSF Event Log
- Telephone Communications Log Sheet, Form EPIPF-EOF-04-02
- Operational Support Facility Team Briefing, Form EPIPF-OSF-03-01

8.1.2 Non-QA Records

None

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Reviewed By <i>Thomas P. Schmidli</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 activation of the RPO/RAF.

2.0 General Notes

- 2.1 The RPO and RAF are activated in parallel with functions performed from both facilities as environmental and radiological conditions permit.

3.0 Precautions and Limitations

- 3.1 If the RPO becomes uninhabitable or high background radiation levels make instrumentation unusable, then relocate to the RAF.
- 3.2 If the RAF and Technical Support Center (TSC) must be evacuated or relocated, then use the guidance in Section 5.3 to assist in maintaining the functionality of the RAF.

4.0 Initial Conditions

- 4.1 An Alert or higher emergency has been declared at the Kewaunee Nuclear Power Plant (KNPP).

5.0 Procedure

Note

Unless otherwise stated, the following tasks may be performed in any order or concurrently.

5.1 RPO/RAF Activation

- 5.1.1 IF the emergency occurs on a back shift, THEN the Radiation Technologist(s) on shift shall report to the RPO and control radiological responses until relieved by the incoming In-Plant Radiation Emergency Team (IRET) members and the Radiation Protection Director (RPD).
- 5.1.2 Until relieved, assume the responsibilities of the RPD.

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Note

Site Boundary Facility (SBF) activation is required upon declaration of an ALERT.

- 5.1.3 Dispatch an IRET member to the SBF to assume the duties of the SBF Coordinator.
- 5.1.4 Activate the RPO as follows:
- 5.1.4.1 Assign a Radiation Protection Leadman and a support staff (technologists/clerks) to the RPO.
- 5.1.4.2 Direct the Radiation Protection Leadman to process non-essential personnel out of the Auxiliary Building/Containment and maintain personnel accountability.
- 5.1.4.3 Establish Auxiliary Building/Containment accountability as follows:
- 5.1.4.3.1 Determine who is in the Radiologically Controlled Area (RCA) by checking PMETS System or (if used) the RCA sign-in sheets.
- 5.1.4.3.2 Notify the RPD immediately of any missing persons.
- 5.1.4.3.3 IF personnel are believed missing, THEN implement EPIP-OSF-04, "Search and Rescue."
- 5.1.4.4 Set up instrumentation for continuous monitoring of radiation levels in the RPO.
- 5.1.4.5 Perform general area surveys in the following areas:
- RPO
 - Monitor room
 - Change room
 - Machine Shop
 - Electric Shop
- 5.1.4.6 WHEN airborne grab samples are taken, THEN record the data on Form EPIPF-RET-02A-02, "Emergency Sample Worksheet."

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5.2 RAF Activation

5.2.1 Verify operability of the following RAF equipment:

- SPING channel readings (additional resource is the Honeywell graphic output 12 for SPING data, 13 for non-SPING data.)
- Fixed radiation monitoring equipment
- "RADAC" RMS Control Console
- Walkie-talkie and base station radio
- Count Room equipment

5.2.2 WHEN the above checks are complete, THEN notify the following that the RAF is activated:

- RAF staff
- TSC
- EPD (if available)

5.2.3 IF directed by the RPD, THEN relocate from the RPO to the RAF.

5.2.4 Maintain personnel accountability per EPIP-SEC-03, "Personnel Assembly and Accountability," during the move from the RPO to the RAF.

5.2.5 Direct personnel who are NOT members of the Emergency Response Organization (ERO) to another assembly point.

5.2.6 Direct evacuating RPO (Radiation Protection and Chemistry) personnel to move the following items to the RAF:

- Calculators
- Walkie-talkies
- Portable radiation survey meters
- Most recent CREWDOSE report
- Master keys and key ring
- Auxiliary Building sign-in sheets (if being used)
- RPO logbook
- Personnel TLD badges and control badges
- First aid responder kit
- Electronic dosimeters

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5.2.7 Make the following announcement over the plant paging system:

**"ATTENTION, ATTENTION: THE RPO HAS BEEN EVACUATED;
THE RPO HAS BEEN EVACUATED; ALL CONTROLLED AREA
ENTRIES ARE TO BE MADE THROUGH THE RAF."**

5.2.8 Post signs in the RPO directing personnel to the RAF for entry to the controlled area.

5.2.9 Periodically (at least every 4 hours) perform radiation surveys in the RAF and TSC to ensure habitability.

5.2.10 IF an Alert or higher is declared based on radiological conditions, OR if directed by the RPD, THEN issue dosimetry to all personnel remaining on-site.

5.2.11 Using the Gai-tronics, direct personnel to monitor their individual dose.

5.2.11.1 IF the Self Reading Dosimeter (SRD) meets any of the following limits, THEN report to the RPO/RAF/SBF to have the SRD re-zeroed:

- Reads 150 mR or more
- Is found to be off-scale
- The end of the work shift

5.3 IF it becomes necessary to evacuate or relocate the RAF, THEN the RPD should consider the following guidance in order to maintain the functionality of the RAF.

5.3.1 The RPD should coordinate with the Emergency Director (ED), Support Activities Director (SAD), and the OSF Coordinator to perform the evacuation or relocation and maintain as much as possible of the functionality of the affected facilities.

5.3.2 The RPD should consider the following in making the evacuation/relocation:

- Communications with the ED, SAD, and OSF Coordinator
- Radiation and contamination monitoring capabilities
- Transport of necessary equipment and supplies to the alternate location
- Continuation of coverage and documentation of exposure to emergency teams
- Evacuation or relocation of excess or unnecessary personnel
- Collection, documentation, and transport for analysis of sample and survey results

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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 EPIP-SEC-03, Personnel Assembly and Accountability
- 7.2 EPIP-OSF-04, Search and Rescue
- 7.3 COMTRAK 89-305, Item 2
- 7.4 COMTRAK 89-305, Item 3

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

- Emergency Sample Worksheet, Form EPIPF-RET-02A-02

8.1.2 Non-QA Records

None

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Reviewed By <i>[Signature]</i>		Approved By <i>[Signature]</i>	
Nuclear Safety Related <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required <input 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 the collection and analysis of liquid samples to determine the existence of, or extent of, any liquid effluent releases or potential releases to the environment.

2.0 General Notes

- 2.1 This procedure is designated CONTINUOUS USE.

3.0 Precautions and Limitations

- 3.1 A preplanned route shall be established to each sample point based on current surveys by the In-Plant Radiation Emergency Team (IRET).
- 3.2 Any sampling or analysis activity having an estimated whole body dose in excess of 10CFR20 limits requires approval of the Emergency Director (ED) and an Emergency Radiation Work Permit, see EPIP-AD-11, "Emergency Radiation Controls."
- 3.3 Self-contained breathing apparatus shall be worn during sampling unless it is determined not to be required by the Radiological Protection Director (RPD).
- 3.4 Survey meters shall be utilized while drawing any sample to determine sample dose rate.
- 3.5 Store any samples saved for later analysis in a shielded storage area or a storage area specified by the RPD.

4.0 Initial Conditions

- 4.1 This procedure is implemented during a declared emergency when the collection of liquid samples is directed by the ED or RPD.

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5.0 Procedure

5.1 WHEN sampling "A" and "B" Steam Generators, THEN collect a sample using one of the following methods:

- Secondary Analytical Panel (Step 5.1.1)
- Hot Chem Lab (Step 5.1.2)

5.1.1 WHEN sampling the Steam Generators via the Secondary Analytical Panel, THEN perform the following:

- 5.1.1.1 Verify the Secondary Analytical Panel is in operation per N-SS-29A, "Secondary Sampling System."
- 5.1.1.2 WHEN sampling "A" Steam Generator, THEN slowly open BT-34A-3, Stm Gen 1A Blowdown Grab Sample Valve.
- 5.1.1.3 WHEN sampling "B" Steam Generator, THEN slowly open BT-34B-3, Stm Gen 1B Blowdown Grab Sample Valve.
- 5.1.1.4 Purge at least 1 liter.
- 5.1.1.5 Obtain required samples.
- 5.1.1.6 Close BT-34A-3 and/or BT-34B-3.
- 5.1.1.7 Inform the Control Room that sample collection is complete and that they may close the valves that were opened from the Control Room to obtain the sample.

5.1.2 WHEN sampling in the Hot Chem Lab, THEN perform the following:

- 5.1.2.1 Verify in operation the Secondary Analytical Panel per N-SS-29A, "Secondary Sampling System."
- 5.1.2.2 WHEN sampling "A" Steam Generator, THEN perform the following:
 - a. Verify closed Sample Room Valve BT-37A, Stm Gen Blowdown 1A Smpl In Smpl Room.
 - b. Open Sample Room Isolation Valve BT-36A, Stm Gen Blowdown 1A Sample Root Valve.
 - c. Slowly open Sample Room Valve BT-37A.

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5.1.2.3 WHEN sampling "B" Steam Generator, THEN perform the following:

- a. Verify closed Sample Room Valve BT-37B, Stm Gen Blowdown 1B Smpl In Smpl Room.
- b. Open Sample Room Isolation Valve BT-36B, Stm Gen Blowdown 1B Sample Root Valve.
- c. Slowly open Sample Room Valve BT-37B.

5.1.2.4 Purge at least 8 liters to the sample sink.

5.1.2.5 Obtain required samples.

5.1.2.6 Close BT-37A and/or BT-37B.

5.1.2.7 Close BT-36A and/or BT-36B.

5.1.2.8 Inform the Control Room that sample collection is complete and that they may close the valves that were opened from the Control Room to obtain the sample.

5.1.3 Analyze the samples for the following:

5.1.3.1 WHEN directed, THEN perform a Gamma scan per RCC-069, "Liquid Discharge Gross Gamma."

5.1.3.2 WHEN directed, THEN perform a Tritium analysis per RCC-068, "Tritium in Liquid."

5.2 WHEN obtaining a Liquid Radioactive Waste sample, THEN sample and analyze per SP-32A-136, "Radiological Liquid Discharges (Batch Mode)" or as defined by special Procedure required because of plant conditions.

5.3 WHEN obtaining a Containment Fan Coil Cooling Water sample, THEN sample and analyze per SP-02-130, "R-16 (Containment Fan Cooling) and R-20 (Spent Fuel Pool and Component Cooling) Monitor Sampling and Setpoint Requirements."

5.4 WHEN obtaining an Auxiliary Building Service Water sample, THEN sample and analyze per SP-02-130, "R-16 (Containment Fan Cooling) and R-20 (Spent Fuel Pool and Component Cooling) Monitor Sampling and Setpoint Requirements."

5.5 WHEN obtaining a sample from the Turbine Building Sump, THEN perform the following:

5.5.1 Verify the TBS pump is running.

5.5.2 Open MD-330, Turb Bldg Sump Pmps 1A & 1B Discharge Header Sam Valve.

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5.5.3 Purge at least 1 liter.

5.5.4 Obtain required samples.

5.5.5 Close MD-330.

5.5.6 Request through the RPD that the Site Team obtain two 1-liter samples from the SWPT settling lagoons.

5.5.7 Analyze the sample for the following:

5.5.7.1 WHEN directed, THEN perform a Gamma scan per RCC-069, "Liquid Discharge Gross Gamma."

5.5.7.2 WHEN directed, THEN perform a Tritium analysis per RCC-068, "Tritium in Liquid."

5.6 WHEN collecting a sample from the Condenser Hotwell, THEN perform the following:

5.6.1 At the Secondary Analytical Panel open C-504-1, Cond Pump Disch Grab Sample Valve.

5.6.2 Purge at least 1 liter.

5.6.3 Obtain required samples.

5.6.4 Close C-504-1.

5.6.5 Analyze the sample for the following:

5.6.5.1 WHEN directed, THEN perform a Gamma scan per RCC-069, "Liquid Discharge Gross Gamma."

5.6.5.2 WHEN directed, THEN perform a Tritium analysis per RCC-068, "Tritium in Liquid."

Note

Heating Boiler blowdown sample collection is possible only during periods of heating boiler blowdown.

5.7 WHEN collecting a Heating Boiler Blowdown sample, THEN perform the following:

5.7.1 Verify that Heating Boiler Blowdown is in progress.

5.7.2 Obtain required samples from the Heating Boiler blowdown per RCC-410, "Heating Boiler Sampling and Chemical Addition."

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5.7.3 Analyze the sample for the following:

5.7.3.1 WHEN directed, THEN perform a Gamma scan per RCC-069, "Liquid Discharge Gross Gamma."

5.7.3.2 WHEN directed, THEN perform a Tritium analysis per RCC-068, "Tritium in Liquid."

6.0 Final Conditions

6.1 The Plant Emergency has been Terminated or Recovery actions have begun and the responsible director has suspended the use of EIPs, or all liquid samples requested by the ED/RPD have been collected, analyzed, and properly stored.

7.0 References

- 7.1 RCC-069, Liquid Discharge Gross Gamma
- 7.2 RCC-068, Tritium in Liquid
- 7.3 RCC-410, Heating Boiler Sampling and Chemical Addition
- 7.4 EPIP-AD-02, Emergency Class Determination
- 7.5 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.6 EPIP-AD-11, Emergency Radiation Controls
- 7.7 SP-32A-136, Radiological Liquid Discharges (Batch Mode)
- 7.8 SP-02-130, R-16 (Containment Fan Cooling) and R-20 (Spent Fuel Pool and Component Cooling) Monitor Sampling and Setpoint Requirements
- 7.9 SP-29-069, Liquid Continuous Radioactive Releases - Steam Generators, Turbine Building Sump
- 7.10 N-SS-29A, Secondary Sampling System

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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

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Reviewed By		 T. ASHLEY		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 ensuring that the required actions are taken to enable the Technical Support Center (TSC) to provide support in a declared emergency.

2.0 General Notes

- 2.1 Functional support provided by the TSC need not be delayed waiting for full activation of the TSC.
- 2.2 If an Alert is declared because of a security threat, the TSC will not be activated. Only Emergency Operations Facility (EOF) and Joint Public Information Center (JPIC) Staff will be activated, all others will go to their homes. If needed, Severe Accident Management assessment can be performed in the EOF.

3.0 Precautions and Limitations

- 3.1 Although the TSC is in an earth-sheltered underground location that is an Appendix R Safe Shutdown area, there is the possibility that the facility may become uninhabitable. If it becomes necessary to evacuate or relocate the facility, the guidance in Section 5.2 should be used to assist in planning and performing the relocation/evacuation.

4.0 Initial Conditions

- 4.1 The Technical Support Center (TSC) is activated for an Alert, Site Emergency, General Emergency, or at the request of the Emergency Director (ED).

5.0 Procedure

- 5.1 Technical Support Center Director (TSCD) OR until a TSCD arrives, an appropriate TSC staff member shall:
- 5.1.1 Obtain the TSC Activation Manual from the TSC materials/supplies cabinet.
- 5.1.2 Direct available TSC staff members to initiate each of the following checklists:

Note

*Initiation of the ERDS link must be completed within **ONE HOUR** after declaration of an Alert or higher classification*

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Note

NRC Communicators are most proficient at performing the ERDS Activation Checklist.

Note

Once the ERDS has been initiated, no further attention to the system should be required. Requests to restart or reset the system from the NRC must be filled promptly.

- a. _____ TSC and OSF Activation Checklist, Form EPIPF-TSC-02-01
- b. _____ TSC Ventilation Checklist, Form EPIPF-TSC-02-02
- c. _____ Emergency Response Data System (ERDS) Link Initiation Checklist, Form EPIPF-TSC-02-03
- d. _____ TSC Chart Recorder Operation Checklist, Form EPIPF-TSC-02-04

- 5.1.3 Ensure the following TSC positions are staffed (Refer to "Response Personnel Call List," EPIP-APPX-A-02).

Note

As positions are filled, they should be signed in on the appropriate status board and be wearing their arm bands.

- a. _____ Technical Support Center Director (TSCD)
- b. _____ Radiological Protection Director (RPD)
- c. _____ Support Activities Director (SAD)
- d. _____ Site Protection Director (SPD)
- e. _____ Engineering Coordinator (ENGCD)
- f. _____ Quality Control Coordinator QCCd)
- g. _____ Data Coordinator (DATAcd)
- h. _____ SAM Team Leader (SAMTL)
- i. _____ SAM Core Hydraulics (SAMCH)
- j. _____ SAM Operations (SAMOps)
- k. _____ NRC Communicator (NRCCm)
- l. _____ Operations Communicator (OpsCm)
- m. _____ EOF Communicator (EOFCm)
- n. _____ Accountability Area Coordinator (ACCCd)
- o. _____ TSC Support Person (TSC-S)

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- 5.1.4 As the TSC is capable of assuming responsibility for each of the following functions, inform the Control Room and/or EOF.

Note

IF the EOF Communicator is responsible for off-site notifications, THEN verify ED is in the TSC and concurs with this status.

- a. _____ Off-site notifications (if EOF is not activated)
- b. _____ NRC communications (ENS/ERDS)

Note

The Communicator conference call should be functioning to consider this position functional.

- c. _____ EOF communication
- d. _____ EAL assessment
- e. _____ Accident assessment

- 5.1.5 Confirm and verify radiological habitability in the TSC with the Radiological Protection Director (RPD).

- 5.1.6 Periodically announce TSC functional and activation status to the TSC/OSF/RAF **AND** report the same to the Control Room and EOF.

- 5.1.7 WHEN the TSC is capable of performing all the functions defined in Step 5.1.2, inform the Control Room and EOF that the TSC is fully activated.

- 5.1.8 WHEN the Emergency Director has determined that the declared emergency can be closed out and the TSC as a facility is no longer needed to support Control Room or off-site activities, secure the TSC using "TSC and OSF De-activation Checklist," Form EPIPF-TSC-02-05.

- 5.2 IF it becomes necessary to evacuate or relocate the TSC, THEN the ED shall consider the following:

- 5.2.1 In order to maintain the functionality of the TSC, the following critical functions may be transferred:

- a. Emergency Director, NRC Communicator, and the Support Activities Director may relocate to the Control Room.
- b. Dose Assessment and Protective Action Recommendation generation may be transferred to the EOF.
- c. The Operational Support Facility may be relocated jointly with the Radiological Assessment Facility.

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- d. The Engineering Coordinator and OSF Manager may move with the OSF/RAF to continue the process of emergency team prioritization and dispatch.

6.0 Final Conditions

- 6.1 Plant Emergency has been closed out AND the TSC is no longer needed for plant or off-site recovery activities.

7.0 References

- 7.1 COMTRAK 93-025, Item 1
- 7.2 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.3 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.4 EPIP Appendix A, Communications
- 7.5 Kewaunee Nuclear Power Plant Emergency Plan

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

- TSC and OSF Activation Checklist, Form EPIPF-TSC-02-01
- TSC Ventilation Checklist, Form EPIPF-TSC-02-02
- Emergency Response Data System (ERDS) Link Initiation Checklist, Form EPIPF-TSC-02-03
- TSC Chart Recorder Operation Checklist, Form EPIPF-TSC-02-04
- TSC and OSF De-activation Checklist, Form EPIPF-TSC-02-05

8.1.2 Non-QA Records

None