



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-02-020

March 1, 2002

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

DOCUMENT TRANSMITTAL

KEWAUNEE NUCLEAR POWER PLANT

FROM: DIANE FENCL - KNPP

TRANSMITTAL DATE 02-27-2002

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

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)	T. Coutu (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 - Training (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)	M. Kuether - Security Building (120)
W. Flint - Cold Chem/HR Sample Room (113)	S. VanderBloomen (125)
M. Kuether - 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
February 27, 2002

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 Fencl by March 27, 2002, SIGNED AND DATED to serve as a record of revision.

EPIP Index, dated 02-27-2002.

REMOVE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EPIP-AD-04	AG	EPIP-AD-04	AH
EPIP-AD-07	AO	EPIP-AD-07	AP
EPIP-AD-18	O	EPIP-AD-18	P
EPIP-EOF-08	U	EPIP-EOF-08	V
EPIP-TSC-10	I	EPIP-TSC-10	J
		Form EIPPF-AD-18-01	A
		Form EIPPF-AD-18-02	A

Return a signed and dated copy of this transmittal letter, within 10 days of receipt, to the sender. If you have any questions or comments, please call Dave Seebart.

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*.

C.S. for
Diane Fencl

Enclosure

EMERGENCY PLAN IMPLEMENTING PROCEDURES**INDEX****DATE: 02-27-2002**

PROC. NO.	TITLE	REV.	DATE
EP-AD			
EPIP-AD-01	Personnel Response to the Plant Emergency Siren	J	01-08-2002
EPIP-AD-02	Emergency Class Determination	AC	11-15-2001
EPIP-AD-03	KNPP Response to an Unusual Event	AE	02-06-2002
EPIP-AD-04	KNPP Response to Alert or Higher	AH	02-27-2002
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	AP	02-27-2002
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
EP-AD-12	Personnel Assembly and Accountability	Deleted	03-26-94
EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
EP-AD-13B	Emergency Assembly/Evacuation	Deleted	03-01-83
EP-AD-13C	Site Evacuation	Deleted	03-01-83
EP-AD-14	Search and Rescue	Deleted	05-25-94
EPIP-AD-15	Recovery Planning and Termination	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
EPIP-AD-18	Potassium Iodide Distribution	P	02-27-2002
EPIP-AD-19	Protective Action Guidelines	Q	11-27-2001

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EPIP-AD-20	KNPP Response to a Security Threat	B	02-06-2002
EP-ENV			
EPIP-ENV-01	Environmental Monitoring Group Organization and Responsibilities	V	10-02-2001
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
EP-ENV-3D	Revision and Control of ISODOSE II	Deleted	02-14-95
EP-ENV-3E	Manual Determination of X/Q	Deleted	04-24-87
EP-ENV-3F	Manual Determination of X/Q (Green Bay Meteorological Data)	Deleted	05-30-86
EP-ENV-3G	Manual Dose Projection Calculation	Deleted	06-02-89
EP-ENV-3H	Protective Action Recommendations	Deleted	04-13-90
EPIP-ENV-04A	Portable Survey Instrument Use	S	06-15-2000
EPIP-ENV-04B	Air Sampling and Analysis	W	10-09-2001
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
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
EP-ENV-5C	SAM II Operation	Deleted	04-14-86
EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
EP-ENV-5E	Reuter-Stokes Operation	Deleted	08-27-85

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EP-ENV-6	Data Analysis, Dose Projections and Protective Action Recommendations	Deleted	12-21-81
EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
EP-ENV-7	Site Access Facility Communications	Deleted	09-26-84
EP-ENV-8	Total Population Dose Estimate Calculations	Deleted	04-14-86
EP-EOF			
EP-EOF-1	Corporate Emergency Response Organization	Deleted	03-11-94
EPIP-EOF-02	Emergency Operations Facility (EOF) Activation	Z	11-29-2001
EPIP-EOF-03	EOF Staff Action for Unusual Event	AC	02-06-2002
EPIP-EOF-04	EOF Staff Action for Alert or Higher	AI	02-06-2002
EP-EOF-5	Corporate Staff Action for Site Emergency	Deleted	04-24-87
EP-EOF-6	Corporate Staff Action for General Emergency	Deleted	04-24-87
EP-EOF-7	Notification of Unusual Event	Deleted	04-06-94
EP-EOF-8	Relocation of EOF	Deleted	03-01-83
EPIP-EOF-08	Continuing Emergency Notifications	V	02-27-2002
EP-EOF-9	Interface with Support Organizations	Deleted	03-05-84
EP-EOF-9	Notification of Site Emergency	Deleted	04-24-87
EP-EOF-10	Notification of General Emergency	Deleted	04-24-87
EPIP-EOF-11	Internal Communication and Documentation Flow	U	11-15-2001
EPIP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center Security	P	07-19-2001

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EP-OP			
EP-OP-1	Control Room Emergency Organization	Deleted	04-24-87
EP-OP-2	Emergency Control Room Activation for Emergency Response	Deleted	04-24-87
EP-OP-3	Control Room Communications	Deleted	04-24-87
EP-OSF			
EP-OSF-1	Operation Support Facility Emergency Organization	Deleted	04-24-87
EPIP-OSF-02	Operational Support Facility Operations	U	02-06-2002
EPIP-OSF-03	Work Requests During an Emergency	O	09-27-2001
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
EPIP-OSF-04	Search and Rescue	D	09-12-2000
EP-RET			
EP-RET-1	Radiation Emergency Team Organization	Deleted	04-16-96
EPIP-RET-02	In-Plant Radiation Emergency Team	U	11-27-2001
EPIP-RET-02A	Radiation Protection Office/Radiological Analysis Facility (RPO/RAF) Activation	T	11-29-2001
EP-RET-2B	Gaseous Effluent Sample and Analysis	Q	03-03-98
EP-RET-2C	Containment Air Sampling and Analysis	Deleted	03-01-83
EPIP-RET-02D	Emergency Radiation Entry Controls and Implementation	M	06-12-2001
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
EP-RET-2F	Personnel Decontamination	Deleted	04-13-90
EPIP-RET-03	Chemistry Emergency Team	O	02-01-2000
EPIP-RET-03A	Liquid Effluent Release Paths	L	11-29-2001
EP-RET-3B	Post-Accident Reactor Coolant Alternate Sampling Procedure	Deleted	01-25-88

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EPIP-RET-03C	Post Accident Operation of the High Radiation Sample Room	P	01-15-2002
EPIP-RET-03D	Containment Air Sampling Analysis Using CASP	N	01-15-2002
EP-RET-3E	Post Accident Operation of High Rad Sample Room Inline Multiported Count Cave	Deleted	08-27-85
EPIP-RET-04	SBF Activation	R	10-02-2001
EP-RET-4A	EOF Radiological Monitoring	Deleted	03-10-83
EPIP-RET-04A	SBF Operation/Relocation	Deleted	10-02-2001
EP-RET-4B	Radiological Controls at Site Access Facility	Deleted	07-12-94
EP-RET-4C	Site Radiological Monitoring	Deleted	07-12-94
EP-RET-4D	SAM-II Operation	Deleted	07-12-94
EP-RET-5	Plume Projection	Deleted	09-26-84
EPIP-RET-05	Site Boundary Dose Rates During Controlled Plant Cooldown	H	10-09-2001
EP-RET-5A	Plume Projection	Deleted	04-27-87
EP-RET-6	Dose Projection	Deleted	04-24-87
EP-RET-7	Radiological Analysis Facility/Radiation Protection Office Communications	Deleted	04-24-87
EPIP-RET-08	Contamination Control of the Aurora Medical Center	P	10-30-2001
EPIP-RET-09	Post-Accident Population Dose	K	08-29-2000
EP-SEC			
EP-SEC-1	Security Organization	Deleted	04-24-87
EPIP-SEC-02	Security Force Response to Emergencies	X	02-06-2002
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EPIP-SEC-03	Personnel Assembly and Accountability	AC	12-14-2001
EPIP-SEC-04	Security Force Actions for Dosimetry Issue	P	10-02-2001

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EP-SEC-5	Security Force Response to the EOF	Deleted	07-28-88
EPIP-SEC-05	Personnel Evacuation	F	07-05-2001
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EPIP-TSC-01	Technical Support Center Organization and Responsibilities	Q	02-06-2002
EPIP-TSC-02	Technical Support Center Activation	T	02-06-2002
EPIP-TSC-03	Plant Status Procedure	V	10-09-2001
EPIP-TSC-04	Emergency Physical Changes, Major Equipment Repair	M	10-02-2001
EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
EPIP-TSC-07	RV Head Venting Time Calculation	I	10-19-2001
EPIP-TSC-08A	Calculations for Steam Release from Steam Generators	N	12-14-2001
EPIP-TSC-08B*	STMRLS Computer Program	F	10-02-2001
EP-TSC-8C*	See EP-TSC-8B	Deleted	04-16-92
* EP-TSC-8B was totally deleted; therefore, EP-TSC-8C was changed to EP-TSC-8B			
EP-TSC-9	Core Damage Assessment Using Released Radionuclides	Deleted	09-30-86
EP-TSC-9A*	Core Damage Assessment	I	02-23-99
EPIP-TSC-09B*	CORE Computer Program	J	10-02-2001
EP-TSC-9C*	See EP-TSC-9B	Deleted	04-16-92
* EP-TSC-9A, Rev. D was totally deleted; therefore, EP-TSC-9B became EP-TSC-9A. EP-TSC-9B was previously EP-TSC-9C.			
EPIP-TSC-10	Technical Support for IPEOPs	J	02-27-2002

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EP-SEC-5 EPIP-APPX-A-06	EP-FIG-003	APPX-A-06-03	Technical Support Center - KNP Floor Plan	B	06-12-2001
EPIP-APPX-A-06	EP-FIG-005	APPX-A-06-02	Site Boundary Facility - KNP Floor Plan	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-008	APPX-A-06-01	Radiological Analysis Facility - KNP Floor Plan	A	10-31-2000
EPIP-EOF-12 Form EPIPF-EOF-02-01	EP-FIG-009	EOF-12-01	Division Office Building (2nd Floor) Floor Plan	B	10-24-2000
EPIP-APPX-A-06	EP-FIG-012	APPX-A-06-08	State/County Work Area - WPSC D2-1 Floor Plan	C	10-31-2000
EPIP-APPX-A-06	EP-FIG-013	APPX-A-06-09	NRC Work Area - WPSC D2-4 Floor Plan	A	10-31-2000
EPIP-AD-19	EP-FIG-014	AD-19-01	Population Distribution by Geographical Sub-Areas (with sectors)	A	10-31-2000
EPIP-APPX-A-06	EP-FIG-022	APPX-A-06-04	EOF - WPSC D2-3 Floor Plan	C	10-30-2001
EPIP-EOF-12	EP-FIG-024	EOF-12-02	Map - Location of JPIC, MBC, GOB, DOB, etc.	B	09-27-2001
EP-SEC-5	EP-FIG-026	SEC-05-01	Site Map	B	09-27-2001
APPX-A-6	EP-FIG-034	---	Floor Plan - Media Briefing Center	Deleted	08-04-98
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APPX-A-6	EP-FIG-037	---	Floor Plan - Corporate Response Center	Deleted	08-04-98
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EPIP-OSF-02	EP-FIG-039	OSF-02-01	High Priority Work	A	10-02-2001
EPIP-OSF-02	EP-FIG-039A	OSF-02-02	Lower Priority Work	A	10-02-2001
EPIP-APPX-A-06	EP-FIG-043	APPX-A-06-10	JPIC - Federal Work Area - WPSC D2-9	B	12-21-2001
EPIP-APPX-A-06	EP-FIG-044	APPX-A-06-07	JPIC - State and County Work Area - WPSC D2-8	C	12-21-2001
EPIP-APPX-A-06	EP-FIG-045	APPX-A-06-05	JPIC - Utility Work Area - WPSC D2-7	C	12-21-2001
RET-08	EP-FIG-046	RET-08-01	Aurora Medical Center Location	A	06-15-2000
EPIP-APPX-A-02	---	APPX-A-02-01	ERO Call Tree	Deleted	12-04-2001

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APPX-A-1	Communication System Description	AF	08-04-98
EPIP-APPX-A-02	Response Personnel Call List	Deleted	02-06-2002
EPIP-APPX-A-03	Off-Site Telephone Numbers	Deleted	02-06-2002
EPIP-APPX-A-06	KNPP Emergency Response Facility Telephone Numbers	AA	12-21-2001

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EP-AD			
AD-07-01	Event Notice (Wisconsin Nuclear Accident Reporting Form)	R	12-14-2001
AD-07-02	State Call-Back - Question Guideline	C	11-15-2001
AD 11.1	Emergency Radiation Work Permit	F	04-16-96
AD-18-01	Airborne Radioiodine Dose Accountability and Potassium Iodide Distribution	A	02-27-2002
AD-18-02	Record of Known Allergy To or Voluntary Refusal to Take Potassium Iodide	A	02-27-2002
EP-ENV			
ENV-01-01	Environmental Dispatch Area Activation Checklist	D	10-31-2000
ENV-01-02	EMT Status	B	10-31-2000
ENV-01-03	Meteorological and Plant Status Data	C	12-14-2001
ENV-01-04	EMT Orders/Field Data	B	10-31-2000
ENV-02-01	EMT Activation Checklist	M	06-15-2000
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EOF-02-02	EOF Deactivation Checklist	L	10-30-2001
EOF-04-01	SRCL Initial Action Checklist	C	12-14-2001
EOF-04-02	Telephone Communications Log Sheet	A	12-14-2001
EOF-08-03	Fax for Emergency Declaration or Status Updates	G	11-27-2001
EOF-08-05	Plant Emergency Status Report	A	11-27-2001
EOF-08-06	Radiological Status Report	D	11-27-2001
EOF-11-02	Operating Status	F	11-15-2001
EOF-11-03	Environmental Status Board	F	11-15-2001
EOF-12-01	I.D. Badge Registration Form	G	10-24-2000

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OSF-03-01	Operational Support Facility Team Briefing	C	12-04-2001
EP-RET			
RET-02A-02	Emergency Sample Worksheet	E	06-05-2001
RET 2B.1	Containment Stack Release (Grab Sample)	C	04-16-96
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
RET 8.4	Hospital Survey 2	Deleted	07-25-97
RET 8.5	Hospital Survey 3	Deleted	07-25-97
RET-08-06	Hospital Survey 4	F	06-15-2000
RET 9	Environmental TLD Record Sheet	C	02-14-95
EP-SEC			
SEC-03.01	Emergency Accountability Log	A	03-28-2000
SEC 4.1	Emergency Dosimeter Log	F	02-16-2000
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TSC-01.01	Plant Status Summary for SAM Implementation	B	02-06-2002
TSC-01.02	Severe Accident Management Summary and Strategy Recommendation	B	02-06-2002
TSC-01.03	Severe Accident Management – Status	B	02-06-2002
TSC-02-01	TSC and OSF Activation Checklist	O	09-27-2001

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TSC 2.2	TSC Ventilation Checklist	H	04-01-99
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TSC-02-04	TSC Chart Recorder Operation Checklist	D	01-30-2001
TSC-02-05	TSC and OSF De-activation Checklist	A	10-09-2001
TSC-03-01	Plant System Status	L	06-12-2001
TSC-03-02	Plant Equipment Status	L	06-12-2001
TSC-03-03	Environmental Status Board	J	06-12-2001
TSC-03-04	Radiation Monitors	I	01-08-2002
TSC-04-01	Emergency Physical Change Request	F	08-29-2000
TSC-04-02	Emergency Physical Change Safety Review	F	08-29-2000
TSC-04-03	Emergency Physical Change Index	F	08-29-2000
TSC-07-01	Head Venting Calculation	F	10-31-2000
TSC-08A-01	Steam Release Data Sheet (Energy Balance)	H	12-14-2001
TSC-08A-02	Steam Release Calculation Sheet (Energy Balance)	G	12-14-2001
TSC-08A-03	Steam Release Data/Calculation Sheet (Open Valve)	E	12-14-2001
TSC-08A-04	Steam Release Data/Calculation Sheet (STMRLS Program)	D	12-14-2001
TSC 9A.1	Core Damage Based on Reactor Vessel Level & Fuel Rod Temp.	C	02-14-95
TSC 9A.2	Core Damage Based on Radiation Monitors	C	02-14-95
TSC 9A.3	Cs-134 and Cs-137 PCF Determination	D	04-16-96
TSC 9A.4	Core Damage Based on Activity Ratios	C	02-14-95
TSC 9A.5	Core Damage Assessment (Monitoring Data)	D	04-16-96
TSC 9A.6	Core Damage Summary	C	02-14-95

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No. EPIP-AD-04		Rev. AH
		Title KNPP Response to Alert or Higher		
		Date FEB 27 2002	Page 1 of 30	
Reviewed By Dave Seebart		Approved By Bill Yarosz		
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 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.

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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.

3.5 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.

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.

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- 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 5.1.6.c.
- 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).
- 5.1.5 Initiate personnel assembly.
- Prepare your Gai-tronics message by making the choices identified in the box below in Step 5.1.5.c.
 - Sound the plant siren.
 - 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.
- 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.
 - IF personnel assembly has been initiated, THEN verify that “Personnel Assembly and Accountability,” EPIP-SEC-03, is initiated.
 - Describe briefly the emergency event.

REFERENCE USE

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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, AND

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 _____, _____, _____.
- 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.
- 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 Emergency Response Facility (ERF) Communicator-Control Room (CR), THEN Steps 5.1.8 and 5.1.10 should be done in parallel.

- 5.1.8 Direct the Notifier or ERF Communicator-CR to initiate notifications per EPIP-AD-07, "Initial Emergency Notifications," using the "Event Notice," Form EPIPF-AD-07-01, completed in Step 5.1.7.

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- 5.1.9 IF the event notification is a combination declaration and termination (quick in and out event), THEN determine the need to activate ERO radio pagers.
- 5.1.10 If appropriate, direct the Notifier or ERF Communicator-CR to activate pagers for all emergency response personnel (group code 9233) in accordance with EPIP-AD-07 Step 5.4. (See KPB Emergency Telephone Directory 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.

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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.

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)

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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 EIPs 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).
- 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)
_____ (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)

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 EPIPF-AD-07-01, is being transmitted accordance with EPIP-AD-07 or EPIP-EOF-08.
- f. Verify all work areas are returned to normal status and emergency procedures, forms, etc. are returned to there proper place.
- g. Collect all completed records, logs, forms, notes, and other documentation and give them to the TSCD.
- h. Implement EPMP-02.01, “Declared Emergency Evaluation and Documentation.”

5.3 The Notifier shall:

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

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5.3.2 WHEN directed by the Emergency Director/Shift Manager, perform event notifications, go to EPIP-AD-07.

5.3.3 IF an Emergency Response Facility (ERF) Communicator-Control Room (CR) 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 Emergency Response Facility (ERF) 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 ERF Communicator-CR has been designated, THEN until released, assist the designated ERF Communicator-CR.
- c. IF an ERF Communicator-CR has NOT been designated, THEN assume the responsibilities of the ERF Communicator-CR and continue to implement this procedure.

5.4.2 Notify the SM/ED of your arrival and assumption of the ERF Communicator-CR 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 or additional communicator support.

5.4.6 IF additional Communicator support is needed, THEN contact the Technical Support Center Director

5.4.7 IF off-site notifications are complete or if a Notifier is implementing them, THEN enter the 4-Way Communications Link. The "dial in number" and "access number" are listed in the KPB Emergency Telephone Directory, ETD 03, "Emergency Response Facilities Telephone List."

5.4.8 Notify the EOD of any significant events.

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

5.4.10 IF Final Conditions (Section 6.0) have NOT been met, THEN go to Step 5.4.4.

5.4.11 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

The responding NRC Communicator may be asked to assist in NRC notification. Off-site and other needed ERO or ERF communications shall be completed before the ERF Communicator-CR can provide this support, unless there is more than one ERF Communicator-CR available.

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 an 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 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 KPB Emergency Telephone Directory 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 When conditions warrant, the RPD shall relocate the RPO to the RAF.

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).

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- 5.8.11 Verify controlled area access is being maintained (EPIP-RET-02D, "Emergency Radiation Entry Controls and Implementation").
- 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:
- a. Direct the staff to perform dose projections (EPIP-ENV-03C, "Dose Projection Using RASCAL Version 2.2 Software").
 - b. Maintain an overall awareness of environmental conditions and the contributing factors for development of protective action recommendations in accordance with procedure EPIP-AD-19.
- 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).

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.

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Note

Off-Site Support Agencies and their phone numbers are listed in the KPB Emergency Telephone Directory.

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.

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.

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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.

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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," EGIP-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.

5.10 **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 EGIP-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 EGIP-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 (EGIP-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.

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5.10.11 Brief the Emergency Director on OSF activities.

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

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

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

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.

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- 5.11.5 IF Search and Rescue is required due to accountability results, THEN notify the Support Activities Director.
- 5.11.6 Direct the security staff to issue dosimetry to personnel responding from off-site (EPIP-SEC-04).
- 5.11.7 When appropriate, relocate to the TSC.
- 5.11.8 Obtain information from the RPD or the Control Room concerning fire, chemical, or radiological hazards present within the protected area.
- 5.11.9 IF hazards identified by the RPD or the Control Room warrant it, THEN restrict ERO personnel movement.
- 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.

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5.11.17 WHEN Final Conditions (Section 6.0) are met:

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

6.0 Final Conditions

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

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

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- 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
- 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

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7.38 EPIP-TSC-09A, Core Damage Assessment

7.39 KPB Emergency Telephone Directory

7.40 EPMP-02.01, Declared Emergency Evaluation and Documentation

7.41 EPMP-02.04, Drill/Exercise Critique and Assessment

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		Jeanne Ferris		Approved By		
Bill Yarosz						
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.

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- 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.

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 EPIPF-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.
- a. 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.
- b. 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).

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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 EPIPF-AD-07-01 (upper left hand corner).

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

- Press the individuals Dial Select number from the table below.
- 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 5.4, "Notification of the ERO."

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5.3 Event Notification (Using Secondary Method, Commercial Phone)

AGENCY	COMMERCIAL #
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.
- 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).

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- 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 (Directors and Select Staff), AND/OR
- _____ "_____", "_____", "_____" - Other code(s) provided by the SM/ED/ERM.
- 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.

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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 the KPB Emergency Telephone Directory.

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 State or County Liaisons listed in the Emergency Telephone Directory tab "KNPP ERO Call List, ETD 01A" and tab "KPB ERO Call List, ETD 01C" until two liaisons accept the ERO Call Tree responsibility.

- a. Inform the first Liaison accepting the ERO Call Tree Task that a(n) _____ (Unusual Event, Alert, Site Emergency, or General Emergency) was declared at _____ (time) and the ERO Call Tree Part "A" in the Emergency Telephone Directory tab "KNPP ERO Call List, ETD 01A," should be activated.
- b. Inform the second Liaison accepting the ERO Call Tree Task that a(n) _____ (Unusual Event, Alert, Site Emergency, or General Emergency) was declared at _____ (time) and the ERO Call Tree Part "B" in the Emergency Telephone Directory tab "KNPP ERO Call List, ETD 01A" and tab "KPB ERO Call List, ETD 01C" should be activated.

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.

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5.6.3 Monitor government verification lines for Call Backs.

- a. 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.
- b. Answer all incoming calls on the Government Verification telephone.
- c. 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).
- d. 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.

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.

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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#."

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).

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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.

7.0 References

- 7.1 Kewaunee Nuclear Power Plant Emergency Plan
- 7.2 EPIP-APPX-A-1, Communication System Description
- 7.3 KPB Emergency Telephone Directory
- 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-EOF-04, EOF Staff Action for Alert or Higher
- 7.7 EPIP-EOF-08, Continuing Emergency Notifications
- 7.8 Form EPIP-AD-07-01, Event Notice (Wisconsin Nuclear Accident Reporting Form)

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

8.1.2 Non-QA Records

None

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		Date	FEB 27 2002	Page 1 of 7		
Reviewed By		Dave Seebart				
Approved By		Bill Yarosz				
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 a method for quickly estimating the dose rate to the thyroid following a known or predicted exposure to radioactive iodine. It also provides guidelines to assist in determining when to issue potassium iodide. Potassium iodide (KI) is a stable iodine which will saturate the thyroid gland, preventing unnecessary thyroid gland exposure from radioiodine.

2.0 General Notes

2.1 Equipment

- 2.1.1 IOSAT, Potassium Iodide Table Package. (130mg per tablet, 14 tablets per package)

3.0 Precautions and Limitations

- 3.1 To be most effective, KI must be taken within 1 to 2 hours after exposure to radioiodine, with maximum effectiveness when taken immediately prior to exposure.
- 3.2 IF KI is administered more than 4 hours after an acute ingestion or inhalation of radioiodine, THEN its effectiveness as a thyroid blocking agent is less than 50 percent.
- 3.3 Directions for use of KI are provided inside the IOSAT package cover. A copy of the content of these directions is provided in Attachment A.
- 3.4 KI should NOT be taken by persons allergic to iodine.
- 3.5 KI should only be taken by individuals on a voluntary basis.

4.0 Initial Conditions

- 4.1 An emergency occurs where the projected dose to the thyroid is likely to exceed 25 rem.
- 4.2 IF the projected dose to the thyroid is NOT likely to exceed 25 rem, THEN the issuance of KI to approved personnel is determined based upon the event.

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5.0 Procedure

5.1 Responsibilities

Note

The calculations and the logistics of administration should be completed before the site announcement is made making KI available.

- 5.1.1 The **RPD** shall recommend the need to issue KI and designate personnel to complete the administration.
- 5.1.2 The **Emergency Director** shall: a) Approve the use of KI, documenting the approval on Form EPIPF-AD-18-01, "Airborne Radioiodine Dose Accountability and Potassium Iodide Distribution." b) Make the site-wide announcement concerning the availability of KI (see Step 5.4 below).
- 5.1.3 The **Emergency Responder**, after an initial dose of one tablet, shall consult with their physician, to determine the need for KI on a continued basis.

5.2 Dose Accountability For Exposures To Airborne Radioiodine and Thyroid Dose Calculations

It is imperative that accurate exposure times and radioiodine concentrations encountered be maintained for each individual's exposure to airborne radioiodine. The dose to the thyroid from airborne radioiodine may be estimated as follows, completing Form EPIPF-AD-18-01.

5.2.1 Inhaled Dose Conversion Factors, rads/ μ Ci:

I-131	1.480 rads/ μ Ci
I-132	0.054 rads/ μ Ci
I-133	0.400 rads/ μ Ci
I-134	0.025 rads/ μ Ci
I-135	0.124 rads/ μ Ci

5.2.2 Breathing Rates

- a. Assume 1.25E06 cc/hour (= 3.47E-04 m³/sec.) for short exposure times or exposures while working.
- b. Assume 8.35E05 cc/hour (= 2.32E-04 m³/sec.) for long exposure times (in excess of a single day).

- 5.2.3 IF the concentration of each iodine isotope is NOT known, THEN use the dose conversion factor for I-131 listed in Step 5.2.1 and illustrated in the Step 5.2.5 example.

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5.2.4 The total amount of radioiodine inhaled in μCi is estimated by multiplying the average airborne concentration in $\mu\text{Ci/cc}$ by the breathing rate in cc/hour by the total time of exposure in hours. The thyroid dose in rads is then calculated by multiplying the total amount in μCi by the dose conversion factors ($\text{rads}/\mu\text{Ci}$) from Step 5.2.1.

5.2.5 Example:

Gross Iodine = $5.4\text{E-}07 \mu\text{Ci/cc}$ in air

Breathing Rate = $1.25\text{E}06 \text{ cc/hour}$

Expected Exposure Time = 1 hour

Inhaled Dose Conversion Factor (I-131) = $1.48 \text{ rads}/\mu\text{Ci}$

Calculation:

$$(5.4\text{E-}07 \mu\text{Ci/cc}) (1.25\text{E}06 \text{ cc/hour}) (1.48 \text{ rads}/\mu\text{Ci}) (1 \text{ hour}) = 0.999 \text{ rads Thyroid Dose}$$

5.3 Administration

5.3.1 Single dose 130 mg tablets of KI are maintained in the following locations:

- a. Technical Support Center Supply Cabinet
- b. Control Room
- c. Site Boundary Facility
- d. Security Building
- e. Environmental Team Field Kits

5.3.2 IF the following conditions are met, THEN KI should be distributed to approved personnel for self administration.

- a. The projected dose to the thyroid is likely to exceed 25 rem, OR
- b. The projected dose to the thyroid is NOT likely to exceed 25 rem, however, based upon the event it is recommended by the RPD, AND
- c. The Emergency Director has approved the distribution of KI.

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5.3.3 The following directors should be contacted to assist in KI administration:

a. Radiological Protection Director for:

- Environmental Monitoring teams
- RPO/RAP personnel
- TSC personnel
- OSF personnel

b. Event Operations Director for:

- Control Room personnel

c. Site Protection Director for:

- Security personnel

5.3.4 Prior to providing KI issue to each individual:

- a. Direct the individual to verify the shelf life of KI tablets is current as indicated on the pharmaceutical container prior to issuing.
- b. Direct the individuals to read the directions and other information on the inside of the IOSAT package.
- c. Ask each individual if they are allergic to iodine. Do NOT issue KI if the answer is YES. Log their name on Form EPIPF-AD-18-02, "Record of Known Allergy to or Voluntary Refusal to Take Potassium Iodide."
- d. Ask each individual if they are accepting the KI on a voluntary basis for self-administration. IF YES, THEN issue KI and log their name on Form EPIPF-AD-18-01, "Airborne Radioiodine Dose Accountability and Potassium Iodide Distribution," Table 2, "Thyroid Dose From Airborne Radioiodine and Potassium Iodide Distribution." IF NO, THEN do NOT issue KI and log their name on Form EPIPF-AD-18-02.

5.3.5 Personnel listed on Form EPIPF-AD-18-02, require alternate protective measures be provided and/or their emergency response duties reassigned.

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5.4 Make the Site-Wide Announcement for KI Administration

- 5.4.1 WHEN the calculations show that administration of KI is warranted AND the administrative logistics are in place, THEN add information to the message box below to complete the message.
- 5.4.2 IF the message for KI announcement is complete, THEN make the announcement over the Gai-tronics system and ensure it is passed to locations not within Gai-tronics range.

Attention in the plant. Attention in the plant. This is the Emergency Director. Radiological conditions exist that warrant the administration of Potassium Iodide tablets. Potassium Iodide tablets will be made available in the following locations. The:

- 5.4.3 Repeat the message.

6.0 Final Conditions

- 6.1 None

7.0 References

- 7.1 Memo NPM 91-0273, Potassium Iodide - Issuance Dose Level, dated February 7, 1991
- 7.2 NRC Information Notice No. 88-15: Availability of U.S. Food and Drug Administration (FDA)-Approved Potassium Iodide for Use in Emergencies Involving Radioactive Iodine, April 18, 1988
- 7.3 NUREG-1210, Public Protective Actions - Predetermined Criteria and Initial Actions, Volume 4, Pilot Program: NRC Severe Reactor Accident Incident Response Training Manual, February 1987.

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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

- Form EPIPF-AD-18-01, Airborne Radioiodine Dose Accountability and Potassium Iodide Distribution
- Form EPIPF-AD-18-02, Record of Known Allergy to or Voluntary Refusal to Take Potassium Iodide

POTASSIUM IODIDE TABLETS PATIENT PACKAGE INSERT

Note: This attachment is furnished for information only.

IOSAT™ Tablets

IOSAT™ Tablets

(Potassium Iodide Tablets, U.S.P.)
(Pronounced poe-TASS-e-um- EYE-oh-dyed)
(Abbreviated KI)

TAKE POTASSIUM IODIDE ONLY WHEN PUBLIC HEALTH OFFICIALS TELL YOU, IN A RADIATION EMERGENCY RADIOACTIVE IODINE COULD BE RELEASED INTO THE AIR. POTASSIUM IODIDE (A FORM OF IODINE) CAN HELP PROTECT YOU.

IF YOU ARE TOLD TO TAKE THIS MEDICINE, TAKE IT ONE TIME EVERY 24 HOURS. DO NOT TAKE IT MORE OFTEN. MORE WILL NOT HELP YOU AND MAY INCREASE THE RISK OF SIDE EFFECTS. DO NOT TAKE THIS DRUG IF YOU KNOW YOU ARE ALLERGIC TO IODIDE (SEE SIDE EFFECTS BELOW).

INDICATIONS

THYROID BLOCKING IN A RADIATION EMERGENCY ONLY

DIRECTIONS FOR USE

Use only as directed by State or local public health authorities in the event of a radiation emergency.

DOSE

ADULTS AND CHILDREN ONE YEAR OF AGE OR OLDER: One (1) tablet once a day. Crush for small children.

BABIES UNDER ONE YEAR OF AGE: One-half (1/2) tablet once a day. Crush first.

DOSAGE: Take for 10 days unless directed otherwise by State or local public health authorities. Store at controlled room tempera-

ture between 15° and 30°C (59° to 86°F). Keep package dry and foil packets intact.

WARNING

POTASSIUM IODIDE SHOULD NOT BE USED BY PEOPLE ALLERGIC TO IODIDE. Keep out of the reach of children. In case of overdose or allergic reaction, contact a physician or public health authority.

DESCRIPTION

Each IOSAT™ Tablet contains 130 mg. of potassium iodide.

HOW POTASSIUM IODIDE WORKS

Certain forms of iodine help your thyroid gland work right. Most people get the iodine they need from foods like iodized salt or fish. The thyroid can "store" or hold only a certain amount of iodine.

In a radiation emergency, radioactive iodine may be released in the air. This material may be breathed or swallowed. It may enter the thyroid gland and damage it. The damage would probably not show itself for years. Children are most likely to have thyroid damage.

If you take potassium iodide, it will fill up your thyroid gland. This reduces the chance that harmful radioactive iodine will enter the thyroid gland.

WHO SHOULD NOT TAKE POTASSIUM IODIDE

The only people who should not take potassium iodide are people who know they are allergic to iodine. You may take potassium iodide even if you are taking medicines for a thyroid problem (for example, a thyroid hormone or antithyroid drug). Pregnant and nursing women and babies and children may also take this drug.

HOW AND WHEN TO TAKE POTASSIUM IODIDE

Potassium iodide should be taken as soon as possible after public health officials tell you. You should take one dose every 24 hours. More will not help you because the thyroid can "hold" only limited amounts of iodine. Larger doses will increase the risk of

side effects. You will probably be told not to take the drug for more than 10 days.

SIDE EFFECTS

Usually, side effects of potassium iodide happen when people take higher doses for a long time. You should be careful not to take more than the recommended dose or take it for longer than you are told. Side effects are unlikely because of the low dose and the short time you will be taking the drug.

Possible side effects include skin rashes, swelling of the salivary glands, and "iodism" (metallic taste, burning mouth and throat, sore teeth and gums, symptoms of a head cold, and sometimes stomach upset and diarrhea).

A few people have an allergic reaction with more serious symptoms. These could be fever and joint pains, or swelling of parts of the face or body and at times severe shortness of breath requiring immediate medical attention.

Taking iodide may rarely cause overactivity of the thyroid gland, underactivity of the thyroid gland, or enlargement of the thyroid gland (goiter).

WHAT TO DO IF SIDE EFFECTS OCCUR

If the side effects are severe or if you have an allergic reaction, stop taking potassium iodide. Then, if possible, call a doctor or public health authority for instructions.

HOW SUPPLIED

IOSAT Tablets (Potassium Iodide Tablets, U.S.P.): packages of 14 tablets (NDC51803-001-01). Each white, round, scored tablet contains 130 mg. potassium iodide

Distributed by
ANBEX, INC.
15 W. 75th St., New York, N.Y. 10023

**INDICATIONS: THYROID BLOCKING
IN A RADIATION EMERGENCY ONLY.**

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Reviewed By Jeanne Ferris		Approved By Bill Yarosz	
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, refer them to the Telephone Response Center at (920) 433-1400 or 1-(800) 838-6192 and tell them that this is the most accurate source of information.
- 2.2 If more than one communicator is available, then it is preferred that Steps 5.2 and 5.4 be done in parallel.

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 Verify the bell switch for the Emergency Government Verification Phone is ON.
- 3.3 If an emergency class escalation, de-escalation, change in PAR, termination, or entry into recovery occurs during these notifications, disregard any remaining steps and return to Step 5.1. Begin the appropriate actions and notifications for the new emergency level.

4.0 Initial Conditions

- 4.1 When the State of Wisconsin Emergency Operations Center (State EOC) is activated, this procedure shall be implemented upon declaration of an event • **ESCALATION**, • **DE-ESCALATION**, • **CHANGE IN PAR**, • **TERMINATION**, or • **ENTRY INTO RECOVERY**, as directed by the SM/ED/ERM.

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5.0 Procedure

5.1 IF the State EOC is NOT activated, THEN go to "Initial Emergency Notifications," EPIP-AD-07.

5.2 Event Notification (Using Primary Method, Dial Select)

5.2.1 Verify that any "Event Notice," Form EPIPF-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.

a. 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.

b. 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 cleared, dial "83-43-53" (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).

5.2.6 WHEN each party acknowledges:

a. Answer by stating, "This is the Kewaunee Nuclear Power Plant - Please stay on the line for a Nuclear Accident Reporting System (NARS) message."

b. Record the time they answer on the "Event Notice," Form EPIPF-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	83-43-53
State EOC	83
Kewaunee County EOC	43
Manitowoc County EOC	53

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 designation** (Ref: “Phonetic Alphabet,” EPIP-APPX-A-1, Attachment A-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 on Dial Select. THEN go to Step 5.3 below.

5.2.12 Go to Step 5.6, “Internal Notification Follow-Up.”

5.3 Event Notification (Using Secondary Method, Commercial Phone)

AGENCY	COMMERCIAL #
State EOC	1-(800) 943-0003
Kewaunee County EOC	1-(920) 487-5257
Manitowoc County EOC	1-(920) 683-4916

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

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

Note

If the EOCs are activated, the verification callbacks are irrelevant and it is not necessary to complete the blanks in the "Verification Call Backs" section of Form EPIPF-AD-07-01.

- 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 radio pager system is inoperable, 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 other staff for an Unusual Event, you must repeat Steps 5.4.2.b through 5.4.2.h 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, 617-xxxx, etc.) External telephone company exchange, OR
 - Dial "9-(920) 617-5213" from a Centrex (431-xxxx) exchange located in the EOF.

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- 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 (Direcotors and Select Staff), AND/OR
 " _____ " _____ " _____ " - Other code(s) provided by the SM/ED/ERM.

- 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 (b).

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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 the KPB Emergency Telephone Directory.

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 State or County Liaisons listed in the Emergency Telephone Directory tab "KNPP ERO Call List, ETD 01A" and tab "KPB ERO Call List, ETD 01C" until two liaisons accept the ERO Call Tree responsibility.

- a. Inform the first Liaison accepting the ERO Call Tree Task that a(n) _____ (Unusual Event, Alert, Site Emergency, or General Emergency) was declared at _____ (time) and the ERO Call Tree Part "A" in the Emergency Telephone Directory tab "KNPP ERO Call List, ETD 01A," should be activated.
- b. Inform the second Liaison accepting the ERO Call Tree Task that a(n) _____ (Unusual Event, Alert, Site Emergency, or General Emergency) was declared at _____ (time) and the ERO Call Tree Part "B" in the Emergency Telephone Directory tab "KNPP ERO Call List, ETD 01A" and tab "KPB ERO Call List, ETD 01C" should be activated.

5.6 Internal Notification Follow-Up

- 5.6.1 Inform the JPIC/Plant Communicator in the EOF after each Event Notice has been transmitted to the state and counties.
- 5.6.2 Inform the SRCL in the EOF after each Event Notice has been transmitted to the state and counties.

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5.7 Record message on Meridian Mail

Note

Review Steps 5.7.1 through 5.7.15 and fill in the information in Step 5.7.7 before picking up the telephone receiver.

Note

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

- 5.7.1 Dial "1700" on any WPSC PBX Telephone (extension xxxx).
- 5.7.2 IF the PBX phone system is inoperable, THEN:
- Dial "1-(920) 617-5213" from any Kewaunee (388-xxxx) or other non-Green Bay external telephone company exchange line, OR
 - Dial "617-5213" from any Green Bay (433-xxxx, 617-xxxx, etc.) external telephone company exchange, OR
 - Dial "9-1-(920) 617-5213" from a Centrex (431-xxxx) exchange located in the EOF.
- 5.7.3 WHEN Meridian Mail answers, Dial "1580#115800#."
- 5.7.4 WHEN acknowledged, Dial "82" (Greeting Maintenance).
- 5.7.5 WHEN acknowledged, Dial "3" (Temporary Greeting).
- 5.7.6 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.

- 5.7.7 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."**
- 5.7.8 Dial "#" (Stop Recording).
- 5.7.9 Dial "2" (Review Greeting).
- 5.7.10 IF greeting is not the same as recorded in Step 5.7.7, THEN return to Step 5.7.4.
- 5.7.11 IF greeting is correct, THEN Dial "9" (expiration date and time).

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5.7.12 Press “#” (default expiration month).

5.7.13 Press the number of tomorrows date and # (expiration day) (example: IF today is October 4, THEN enter “5#”).

5.7.14 Press “0400#” (expiration time).

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

5.8 Event Notice Fax

Note

You will receive a confirmation copy of your fax broadcast material and a summary of delivery status at the fax machine in Public Affairs (A2-South West).

Note

IF a confirmation fax is not received or other problems are encountered with the broadcast fax, THEN additional information on use can be found in the Nuclear Emergency Public Information Plan (NEPIP) Appendix 10.

5.8.1 WHEN time permits, send fax broadcast, obtain a fax cover sheet “Fax for Emergency Declaration or Status Updates,” Form EPIPF-EOF-08-03, and prefix the “Event Notice,” Form EPIPF-AD-07-01, with it.

- a. Dial “1-(800) 839-6734” on the EOF fax machine telephone receiver.
- b. Follow the prompts and enter “1115947,” (the seven digit mailbox number).
- c. Enter “985947” (pin code).
- d. Press “#.”
- e. Enter “008#”(broadcast list number).
- f. Press “#” (immediate delivery).
- g. Place the document in the fax machine.
- h. Press the “START” (or “FAX”) button.
- i. Hang up the telephone receiver.

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Note

Detailed instructions for the use of the EOF fax machine are contained in "Communication System Description," EPIP-APPX-A-1, Section 5.10.

- 5.8.2 **IF** the fax broadcast capability is lost, **THEN** send fax copies of the "Event Notice," Form EPIPF-AD-07-01, to the following locations individually:

LETTER DESIGNATOR	REMOTE FAX LOCATION	REMOTE FAX NUMBER
A	NRC Headquarters	9-1 (301) 816-5151
B	Wisconsin DEM (EOC)	9-1 (608) 242-3299
C	Wisconsin-Rad. Protection (EOC)	9-1 (608) 242-3285
D	DHFS Mobile Lab	9-1 (920) 794-7388
E	Kewaunee County EG (EOC)	9-1 (920) 487-2963
F	Manitowoc County EM (EOC)	9-1 (920) 683-4568
G	American Nuclear Insurance	9-1 (860) 561-4655
H	INPO	9-1 (770) 644-8549
I	Point Beach Nuclear Plant	9-1 (920) 755-6258
J	KNPP TSC	9-1 (920) 388-8396
K	JPIC	9 431-6428
L	Point Beach Admin	9-1 (920) 755-6258
M	NMC	9-1 (715) 377-3355

- 5.9 Return to EPIP-AD-03, EPIP-AD-04, or EPIP-EOF-04 at the step when you left that procedure.

6.0 Final Conditions

- 6.1 The off-site notification implemented upon declaration of an event • **DECLARATION**, • **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 KPB Emergency Telephone Directory
- 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-07, Initial Emergency Notifications
- 7.7 EPIP-EOF-04, EOF Staff Action for Alert or Higher
- 7.8 EPIP Appendix B, Forms

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

8.1.2 Non-QA Records

None

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Reviewed By <i>Jeanne M. Ferris</i>		Approved By <i>David R. Leebart</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 technical guidance to Severe Accident Management Operations (SAMOPs) and Technical Support Center staff members during implementation of the Kewaunee Nuclear Power Plant (KNPP) Integrated Plant Emergency Operating Procedures (IPEOPs).

2.0 General Notes

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

3.0 Precautions and Limitations

- 3.1 This procedure should only be used as a guide to the Technical Support staff. Plant parameters should be monitored to determine plant conditions prior to implementation of these guidelines.
- 3.2 Shift Manager and Event Operations Director approval is required to activate the Post-Accident Leakage Control System.
- 3.3 IPEOP implementation may lead to violation of plant Technical Specifications. The NRC must be notified of any violation per 10CFR50.54(x).

4.0 Initial Conditions

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

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5.0 Procedure

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

5.1.1 Evaluate Plant Status:

- a. This step instructs the operator to consult Technical Support staff to determine if E-MDS-30, Post-Accident Leakage Control System, should be implemented. Post-Accident Leakage Control System is actuated if Auxiliary Building radiation levels are increasing or significant core damage has occurred. Determination of whether E-MDS-30 is to be implemented should be made at this time because the procedure requires local actions which may be prohibited following transfer to Containment sump recirculation due to high radiation levels.
- b. Chemistry is contacted to start up the Containment Hydrogen Monitoring System (EPIP-RET-03C) and obtain primary and secondary samples per other EIPs.

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

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

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

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

5.3.1 Determine if Reactor Vessel Head Should Be Vented:

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

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5.3.2 Identify Growth of a Void in the Vessel:

- a. The growth of a void in the vessel upper head can be identified by monitoring the Reactor Vessel Liquid Inventory System (RVLIS) upper range. A RVLIS indicating less than a full upper head is the primary means of determining if voids exist. In addition to RVLIS, other indirect indications of voids in the RCS are listed below (these voids are not necessarily located in the reactor vessel head).
 1. Pressurizer level response to RCS pressure changes may not be normal if voids exist in the RCS. The pressurizer level may decrease during a RCS pressurization due to void compression or condensation. Also, the level may rise rapidly during a spraying operation due to void expansion or generation.
 2. An indication of reactor vessel head temperatures equal to or greater than saturation temperature warrants the assumption that a steam bubble has been generated in the reactor vessel head.
 3. The operator may suspect noncondensable voids in the RCS after either a complete SI accumulator tank discharge or an inadequate core cooling condition.
- b. IF a steam void is formed during post-LOCA cooldown and depressurization or during a steam generator tube rupture recovery, THEN no attempt should be made to condense the void through repressurization. Only RXCP restart or continued cooling from CRDM fans should be used. Refer to IPEOP FR-I.3 and Section 5.27 of this procedure.

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

5.4.1 Consult with Emergency Director for Additional Recovery Actions:

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

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

5.5.1 Evaluate Long-Term Plant Status:

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

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

5.6.1 Check if RHR System Should Be Placed in Service:

- The RHR System is designed to operate below specific RCS pressure and temperature conditions (RCS hot leg temperature less than 400°F and RCS pressure less than 425 psig). Depending on the size of the break, different actions should be taken.
- For smaller breaks, the SI pumps will have been stopped in most cases and most of the RWST water will still be available by the time the RHR System entry criteria are satisfied. For these cases, the RHR System could be placed in service with the RHR pumps taking suction from the hot legs. Any high-head pump left running would remain aligned in the cold leg injection mode taking suction from the RWST. When charging flow is established, the injection source is also from the RWST.
- For larger breaks, the RWST level will eventually decrease to the recirculation transfer setpoint and at least one RHR pump must be used for containment sump recirculation. IF the RHR System is not placed in service, THEN the system can remain in the long-term recirculation mode with the core residual heat being dissipated through the safeguards (RHR) heat exchangers.

5.6.2 Consider These Three Important Factors:

- The RWST (or alternate) source of injection (make-up) water must be available for operating high-head SI, charging pumps, and RHR in split-train operation.
- Confirmation of system availability, including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction, must take place before RHR operation can begin.

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- c. Auxiliary building radiation levels should be evaluated. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event. Care should be taken to minimize the spread of radioactive fluid through the CVCS system, if possible. Additionally, during a design basis LOCA, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hr or more due to "shine" from the containment building.

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

5.7.1 Consult with Emergency Director for Additional Recovery Actions:

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

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

5.8.1 Evaluate Long-Term Plant Status:

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

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

5.9.1 Evaluate Long-Term Plant Status:

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

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

5.10.1 Evaluate Long-Term Plant Status:

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

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

5.11.1 Evaluate Long-Term Plant Status:

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

5.12 IPEOP ECA-0.0: LOSS OF ALL AC POWER

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

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

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5.13 IPEOP ECA-1.1: LOSS OF EMERGENCY COOLANT RECIRCULATION

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

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

5.13.2 Consult with Emergency Director for Additional Recovery Actions:

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

5.13.3 Consult with Emergency Director:

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

5.14 IPEOP ECA-2.1: UNCONTROLLED DEPRESSURIZATION OF BOTH SGs

5.14.1 Evaluate Long-Term Plant Status:

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

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

5.15.1 Consult with Emergency Director:

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

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

5.16.1 Check if RHR System Should Be Placed in Service:

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

5.16.2 Consider These Three Important Factors:

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

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

5.17.1 Consult with Emergency Director for Additional Recovery Actions:

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

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

5.18.1 Evaluate Long-Term Plant Status:

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

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

5.19.1 Check if RHR System Should Be Placed in Service:

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

5.19.2 Consider These Three Important Factors:

- a. The RWST (or alternate) source of injection (make-up) water must be available or operating high-head SI, charging pumps, and RHR in split-train operation.
- b. Confirmation of system availability including all pumps, valves, and adequate inventory in the RCS to preclude steam from entering the RHR pump suction must take place before RHR operation can begin.

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- c. Auxiliary building radiation levels should be evaluated. Placing RHR in service in the normal lineup will cause potentially highly radioactive fluid to be transported through lines that did not have radioactive fluid in them prior to the event. Care should be taken to minimize the spread of radioactive fluid through the CVCS System if possible. Additionally, during some design basis accidents, some valves and equipment (such as RHR-10A and RHR-10B) are projected to be in radiation fields of 1,000 R/hour or more due to "shine" from the containment building.

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

5.20.1 Consult with Emergency Director for Additional Recovery Actions:

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

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

5.21.1 Evaluate Long-Term Plant Status:

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

5.22 IPEOP ECA-3.3: SGTR WITHOUT PRESSURIZER PRESSURE CONTROL

5.22.1 Evaluate Long-Term Plant Status:

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

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

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

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

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

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

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

5.24.2 Consult with Emergency Director for Additional Recovery Actions:

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

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

- 5.25.1 Notify Emergency Director of Sump Level and Activity Level to Obtain Recommended Action:
- The ED should request evaluation of the cause of the event and provide specific recommendations to the Operators for reducing containment water level.

5.25.2 Consider the Following Three Methods to Reduce Flooding:

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

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

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

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

- 5.27.1 Obtain Maximum Allowable Venting Time from Technical Support Center Director (Per EPIP-TSC-07):
- Calculation of the maximum allowable venting time is based on maintaining containment hydrogen concentration below 3% in dry air. The lower the initial hydrogen concentration, the longer the venting can continue. Procedure EPIP-TSC-07 describes the method of determining RCS venting time.

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6.0 Final Conditions

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

7.0 References

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

8.0 Records

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

8.1.1 QA Records

None

8.1.2 Non-QA Records

None

AIRBORNE RADIOIODINE DOSE ACCOUNTABILITY AND POTASSIUM IODIDE DISTRIBUTION

TABLE 1 - THYROID DOSE RATE CALCULATION

Location:				
ISOTOPE	CONCENTRATION $\mu\text{Ci}/\text{CC}^{(3),(4)}$	DOSE CONVERSION FACTOR (rads/ μCi)	⁽²⁾ BREATHING RATE	ESTIMATED THYROID DOSE RATE (rads/hr)
I-131		1.480 rads/ μCi		
I-132		0.054 rads/ μCi		
I-133		0.400 rads/ μCi		
I-134		0.025 rads/ μCi		
I-135		0.124 rads/ μCi		
			TOTAL DOSE RATE (rads/hr)	

TABLE 2 - THYROID DOSE FROM AIRBORNE RADIOIODINE AND POTASSIUM IODIDE DISTRIBUTION

[illegible]

⁽¹⁾ From Table 1

(2) Short Exposure Times or Exposures While Working - Assume 1.25E06 cc/hour. Long Exposure Times (Excess of Single Day) - Assume 8.35E05 cc/hour

(3) If NOT known, conservatively use the DCF for I-131

(4) Record sample number(s) data is from, or how long airborne radioiodine concentration was derived:

Recommended By: _____ Date / Time _____ / _____
Radiological Protection Director

Approved By: _____ Date / Time ____/____/____
Emergency Director

Administering Director By: _____ Date / Time _____ / _____

RECORD OF KNOWN ALLERGY TO OR VOLUNTARY REFUSAL TO TAKE POTASSIUM IODIDE

NAME			REASON (Optional)	ALTERNATE PROTECTIVE MEASURE TAKEN
LAST	FIRST	MI		

Administering Director By: _____ Date/Time: ____/____/____