



April 14, 2014

In reply, please refer to LAC-14304

DOCKET NO. 50-409 and 72-046

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Dairyland Power Cooperative
La Crosse Boiling Water Reactor (LACBWR)
Possession-Only License DPR-45
Supplement to Response to NRC Request for Additional Information Concerning License
Amendment Request for Changes to LACBWR Emergency Plan

REFERENCES: 1) Letter, NRC to DPC dated December 16, 2013, Request for Additional
Information Related to Dairyland Power Cooperative Request for Review and
Approval of Major Changes to the La Crosse BWR Emergency Plan
(TAC No. J52956)
2) Telecon, NRC and DPC, March 26, 2014, Discussion of Additional Changes to
LACBWR Emergency Plan

Dairyland Power Cooperative (DPC) hereby provides additional changes to the LACBWR Emergency Plan as discussed during telephone conference of Reference 2. The Emergency Plan revision has been reviewed by the onsite LACBWR Operations Review Committee (ORC) and offsite Safety Review Committee. Following discussion at an ORC meeting, Revision 34 to the LACBWR Emergency Plan was approved for implementation pending NRC review and approval.

If you have any questions concerning this information, please contact Don Egge, LACBWR Plant/ISFSI Manager at (608) 689-4207.

Sincerely,

William L. Berg, President and CEO

WLB:JBM:jkl

Attachments: 1) LACBWR Emergency Plan, Revision 34
2) Description of Changes

AX45
FSME20
NM5526
FSME
NM55

cc w/Attachments: Marlayna Vaaler
Project Manager
U.S. Nuclear Regulatory Commission

Cynthia Pederson
Regional Administrator, Region III
U.S. Nuclear Regulatory Commission

Paul Schmidt
Manager, Radiation Protection Section
State of Wisconsin

STATE OF WISCONSIN)
)
COUNTY OF LA CROSSE)

Personally came before me this 16th day of April, 2014, the above named, William L. Berg, to me known to be the person who executed the foregoing instrument and acknowledged the same.



Notary Public, La Crosse County Wisconsin

My commission expires 5-25-14

LAURIE A. ENGEN
Notary Public
State of Wisconsin

LACBWR ISFSI EMERGENCY PLAN, REVISION 34

DESCRIPTION OF CHANGES

NOTE: *Changes described following are as they appear in the LACBWR ISFSI Emergency Plan, Revision 34. These changes are in addition to those described previously for Revision 33 and included in a License Amendment Request dated August 6, 2013.*

Cover Page The cover page is updated to *Revision 34*.

Page ii **Table of Contents:** Title of Section 4.3 is revised to *Declaration of ALERT* from Notification of Unusual Event. This and other similar changes are consistent with NRC guidance for an away-from-reactor ISFSI and meet the intent of regulation in 10 CFR 72.32.

Table of Contents item for Appendix D, "Emergency Kits and Supplies," is deleted. Appendix D contained inventory lists of emergency planning kits. These kits are maintained in accordance with the lower tier document Emergency Plan Procedure EPP-20.08. The inclusion of the kit inventories in the Emergency Plan is redundant and unnecessary.

Page 1-1 **Section 1.0, Introduction:** Fourth paragraph of this section is revised to state that an ISFSI emergency is classified as an *ALERT* instead of an Unusual Event. This and other similar changes are consistent with NRC guidance for an away-from-reactor ISFSI and meet the intent of regulation in 10 CFR 72.32.

In last paragraph of section on same page citation for 10 CFR 72.32(c) is corrected to read simply *10 CFR 72.32*. Purpose of this change is to meet the intent of regulation in 10 CFR 72.32.

Page 4-1 **Section 4.1, Classification of Accidents:** In first paragraph, the second and third sentences that contained citation and discussion of findings described in NUREG-1140 are deleted and replaced with the explanation that ISFSI emergencies are given the emergency classification of an *ALERT* which is consistent with NRC guidance for an away-from-reactor ISFSI and that emergency classification in this manner meets the intent of regulation in 10 CFR 72.32.

Section 4.2, Emergency Classification Levels (ECLs): In this section, Unusual Event is replaced with *ALERT* in three places.

Section 4.3, Declaration of ALERT: Title of section is renamed from Notification of Unusual Event. Definition of *ALERT*, paraphrased from NEI-99-01, is used in place of that for Unusual Event. *ALERT* is used where previously Unusual Event appeared.

- Page 4-2 Table 4.1, ISFSI Emergency Events: Emergency Classification Level for three listed Event Types is changed to *ALERT* replacing Unusual Event. Footnote 2 at bottom is revised to read *Vernon County Sheriff's Department* instead of Office.
- Page 5-1 Section 5.0, Response: In subsections 5.1, 5.2, and 5.3, Unusual Event is replaced with *ALERT* in eight places. Section 5.2 is revised to read *Vernon County Sheriff's Department* instead of Office.
- Page 5-2 Section 5.4, Radiological Assessment: Unusual Event is replaced with *ALERT* in two places: in last sentence of Section 5.4 and in first sentence of Section 5.4.1.
- Page 5-4 Section 5.5.2, Decontamination Capabilities: In second paragraph, Health and Safety Procedures is replaced with simply *procedures*. Procedure types may change after completion of plant decommissioning. Description of the Decontamination Kit is revised by deletion of, "if needed at the ISFSI." Personnel contamination at the ISFSI is not a credible event.
- Page 5-7 Figure 5.1, Notification Channels: Right upper text block is revised to read *Vernon County Sheriff's Department* instead of Office.
- Page 6-1 Section 6.3.1, Equipment: In first paragraph, description of emergency planning kits is revised to indicate Decontamination Kit is located in the plant Administration Building and that the Emergency Kit will be located at the ISFSI Administration Building instead of the plant Administration Building. After completion of plant decommissioning, the ISFSI Emergency Kit will remain and the Decontamination Kit will be unnecessary.
- Page 8-1 Section 8.2, Training: Section is revised to better explain routine training that will be given to Emergency Response Organization personnel.
- Section 8.2.1, Emergency Plan Training: Section is revised to better explain Emergency Plan training for ISFSI personnel and Emergency Response Directors.
- Page A-1 Appendix A, Definitions, Abbreviations and Acronyms: Definition of *ALERT*
Through paraphrased from NEI-99-01 is added. Definition of Unusual Event is deleted.
Page A-3 Acronym of NOUE for Notification of Unusual Event is deleted.
- Page B-1 Appendix B, Letters of Agreement: Titles for Securitas and Vernon County Sheriff are updated and made consistent.
- Page C-1 Appendix C, Emergency Plan Procedures: Title for EPP-20.08 is corrected.
- Page D-1 Appendix D, Emergency Kits and Supplies: Appendix D is deleted. Appendix D contained inventory lists of emergency planning kits. These kits are maintained in accordance with the lower tier document Emergency Plan Procedure EPP-20.08. The inclusion of the kit inventories in the Emergency Plan is redundant and unnecessary.