



NRC-00-013

Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)
Kewaunee Nuclear Power Plant
North 490, Highway 42
Kewaunee, WI 54216-9511
920-388-2560

February 11, 2000

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, Wisconsin Public Service Corporation hereby submits one copy of the latest revisions to the Kewaunee Nuclear Power Plant Radiological Emergency Response Plan Implementing Procedures (EIPs). These revised procedures supersede the previously submitted procedures.

Pursuant to 10 CFR 50.4, two additional copies of this letter and attachment are hereby submitted to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region III, Lisle, Illinois. As required, one copy of this letter and attachment is also submitted to the Kewaunee Nuclear Power Plant NRC Senior Resident Inspector.

Sincerely,

A handwritten signature in black ink that reads "Mark L. Marchi".

Mark L. Marchi
Vice President-Nuclear

DLF/jmf

Attachment

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

A045

KEWAUNEE NUCLEAR POWER PLANT

January 18, 2000

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

RETURN TO DIANE FENCL - KNPP

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T. Webb - State of Wisconsin (5)*
T. Webb - KNPP QA Vault w/NRC Letter (15)*

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J. Bennett (33) D. Mielke (35) J. Mueller (13) K. Weinbauer (28)

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QP Library - KNPP (59) Resource Center (82, 89, 94, 131)
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D. Braun - Admin. Bldg. Upper (45) M. Anderson - CR/SS Office (51, 56)
J. Hannon - I&C Office (42) L. Renier-Hicks – GB-D2 Nuclear (84)
M. Mowrer - Security Building (46) J. Mueller - TSC (50)
L. Renier-Hicks – GB-D2 Nuclear EOF (77) C. Long - RAF (53)
J. Mueller - OSF (52) C. Long - SBF/EMT (54)
C. Hutter - ATF-1 (64) C. Long - RPO (55)
LOREB – ATF-1 (66)

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C. Long - SBF/EM Team (110, 111, 111A) J. Fletcher - Security (121)
C. Long - T. R. Hospital (118, 119) N. Deda - Security Building (120)
W. Flint - Cold Chem/HR Sample Room (113) K. Evers (125)
N. Deda - SBF/SEC (114) J. Stoeger (126)

Originals to KNPP QA Vault

Please follow the directions when updating your EPIP Manual. **WATCH FOR DELETIONS!!!** These are controlled procedures and random checks may be made to ensure the manuals are kept up-to-date.

***THIS IS NOT A CONTROLLED COPY. IT IS A COPY FOR INFORMATION ONLY.**

KEWAUNEE NUCLEAR POWER PLANT
 REVISION OF EMERGENCY PLAN IMPLEMENTING PROCEDURES
 January 18, 2000

Please follow the directions listed below. If you have any questions regarding changes made to the EIPs, please contact Dave Seebart at ext. 8719. If you are a controlled copy holder (see cover page), return this page to Diane Fencil by February 18, 2000, SIGNED AND DATED to serve as a record of revision.

DELETE		INSERT	
PROCEDURE	REV.	PROCEDURE	REV.
EP-AD-15	L	EPIP-AD-15	M
EP-RET-3C	N	EP-RET-3C	O
EP-RET-3D	L	EP-RET-3D	M

I CERTIFY Copy No. _____ (WPSC No.) of the Kewaunee Nuclear Power Plant's EIPs has been updated.	
_____	_____
SIGNATURE	DATE
Please return this sheet to <i>DIANE FENCIL</i> .	

Diane Fencil
 Diane Fencil

Enclosure

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

PROC. NO.	TITLE	REV.	DATE
EP-AD			
EP-AD-1	Plant Personnel Response to an Emergency	E	03-16-99
EP-AD-2	Emergency Class Determination	Y	12-15-98
EP-AD-3	KNPP Response to an Unusual Event	Z	01-19-99
EP-AD-4	KNPP Response to Alert or Higher	AA	01-19-99
EP-AD-5	Site Emergency	Deleted	04-27-87
EP-AD-5	Emergency Response Organization Shift Relief Guideline	A	10-13-98
EP-AD-6	General Emergency	Deleted	04-24-87
EP-AD-7	Initial Emergency Notifications	AJ	01-19-99
EP-AD-8	Notification of Alert or Higher	Deleted	02-26-96
EP-AD-9	Notification of Site Emergency	Deleted	04-27-87
EP-AD-10	Notification of General Emergency	Deleted	04-27-87
EP-AD-11	Emergency Radiation Controls	P	08-10-99
EP-AD-12	Personnel Assembly and Accountability	Deleted	03-26-94
EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
EP-AD-13B	Emergency Assembly/Evacuation	Deleted	03-01-83
EP-AD-13C	Site Evacuation	Deleted	03-01-83
EP-AD-14	Search and Rescue	Deleted	05-25-94
EPIP-AD-15	Recovery Planning and Termination	M	01-18-2000
EP-AD-16	Occupational Injuries or Vehicle Accidents During Emergencies	Deleted	03-14-97
EP-AD-17	Communications	Deleted	03-05-84
EP-AD-18	Potassium Iodide Distribution	M	07-25-97
EP-AD-19	Protective Action Guidelines	O	06-23-98
EP-ENV			
EP-ENV-1	Environmental Monitoring Group Organization and Responsibilities	T	02-23-99
EP-ENV-2	Environmental Monitoring Team Activation	V	02-23-99

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

PROC. NO.	TITLE	REV.	DATE
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-3C	Dose Projection Using RASCAL Version 2.2 Software	T	12-29-99
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
EP-ENV-4A	Portable Survey Instrument Use	R	02-23-99
EP-ENV-4B	Air Sampling and Analysis	U	02-23-99
EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
EP-ENV-4C	Ground Deposition Sampling and Analysis	U	02-23-99
EP-ENV-4D	Plume Tracking for Environmental Monitoring Teams	L	02-23-99
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
EP-ENV-5C	SAM II Operation	Deleted	04-14-86
EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
EP-ENV-5E	Reuter-Stokes Operation	Deleted	08-27-85
EP-ENV-6	Data Analysis, Dose Projections and Protective Action Recommendations	Deleted	12-21-81
EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
EP-ENV-7	Site Access Facility Communications	Deleted	09-26-84
EP-ENV-8	Total Population Dose Estimate Calculations	Deleted	04-14-86

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

PROC. NO.	TITLE	REV.	DATE
EP-EOF			
EP-EOF-1	Corporate Emergency Response Organization	Deleted	03-11-94
EP-EOF-2	Emergency Operations Facility (EOF) Activation	W	08-10-99
EP-EOF-3	Corporate Action for Unusual Event	Y	03-16-99
EP-EOF-4	Corporate Action for Alert or Higher	AE	03-16-99
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
EP-EOF-8	Continuing Emergency Notifications	R	08-31-99
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
EP-EOF-11	Internal Communication and Documentation Flow	S	03-16-99
EP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center Security	N	08-10-99
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
EP-OSF-2	Operational Support Facility Operations	R	07-27-99
EP-OSF-3	Work Requests During an Emergency	M	09-21-99
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
EPIP-OSF-04	Search and Rescue	C	12-15-99

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

PROC. NO.	TITLE	REV.	DATE
EP-RET			
EP-RET-1	Radiation Emergency Team Organization	Deleted	04-16-96
EP-RET-2	In-Plant Radiation Emergency Team	R	07-27-99
EP-RET-2A	RPO - RAF Activation	Q	07-27-99
EP-RET-2B	Gaseous Effluent Sample and Analysis	Q	03-03-98
EP-RET-2C	Containment Air Sampling and Analysis	Deleted	03-01-83
EP-RET-2D	Emergency Radiation Entry Controls and Implementation	L	07-27-99
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
EP-RET-2F	Personnel Decontamination	Deleted	04-13-90
EP-RET-3	Chemistry Emergency Team	N	03-14-97
EP-RET-3A	Liquid Effluent Release Paths	K	01-12-99
EP-RET-3B	Post-Accident Reactor Coolant Alternate Sampling Procedure	Deleted	01-25-88
EP-RET-3C	Post Accident Operation of the High Radiation Sample Room	O	01-18-2000
EP-RET-3D	Containment Air Sampling Analysis Using CASP	M	01-18-2000
EP-RET-3E	Post Accident Operation of High Rad Sample Room Inline Multiported Count Cave	Deleted	08-27-85
EP-RET-4	SBF Activation	P	07-27-99
EP-RET-4A	EOF Radiological Monitoring	Deleted	03-10-83
EP-RET-4A	SBF Operation/Relocation	C	07-27-99
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
EP-RET-5	Site Boundary Dose Rates During Controlled Plant Cooldown	F	07-21-98
EP-RET-5A	Plume Projection	Deleted	04-27-87
EP-RET-6	Dose Projection	Deleted	04-24-87

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

PROC. NO.	TITLE	REV.	DATE
EP-RET-7	Radiological Analysis Facility/Radiation Protection Office Communications	Deleted	04-24-87
EP-RET-8	Contamination Control of the Two Rivers Community Hospital	N	08-04-98
EP-RET-9	Post-Accident Population Dose	J	08-10-99
EP-SEC			
EP-SEC-1	Security Organization	Deleted	04-24-87
EP-SEC-2	Security Force Response to Emergencies	S	09-21-99
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EP-SEC-3	Personnel Assembly and Accountability	W	11-10-98
EP-SEC-4	Security Force Actions for Dosimetry Issue	N	09-21-99
EP-SEC-5	Security Force Response to the EOF	Deleted	07-28-88
EP-SEC-5	Personnel Evacuation	D	07-21-98
EP-TSC			
EP-TSC-1	Technical Support Center Organization and Responsibilities	O	04-01-99
EP-TSC-2	Technical Support Center Activation	Q	04-01-99
EP-TSC-3	Plant Status Procedure	T	07-21-98
EP-TSC-4	Emergency Physical Changes, Major Equipment Repair	K	08-10-99
EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
EP-TSC-7	RV Head Venting Time Calculation	G	05-26-94
EP-TSC-8A	Calculations for Steam Release from Steam Generators	L	02-23-99
EP-TSC-8B*	STMRLS Computer Program	D	04-16-96
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			

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

PROC. NO.	TITLE	REV.	DATE
EP-TSC-9	Core Damage Assessment Using Released Radionuclides	Deleted	09-30-86
EP-TSC-9A*	Core Damage Assessment	I	02-23-99
EP-TSC-9B*	CORE Computer Program	H	04-16-96
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.			
EP-TSC-10	Technical Support for IPEOP's	G	04-01-99

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

FIGURES				
EPIP	FIG #	DESCRIPTION	REV.	DATE
EP-SEC-5 APPX-A-6	EP-FIG-003	Floor Plan - Technical Support Center	ORIG	03-03-98
APPX-A-6	EP-FIG-005	Floor Plan - Site Boundary Facility	ORIG	03-03-98
APPX-A-6	EP-FIG-008	Floor Plan - Radiological Analysis Facility	ORIG	03-03-98
EP-EOF-12 Form EOF 2.1	EP-FIG-009	Floor Plan - Division Office Building (2nd Floor)	A	08-10-99
APPX-A-6	EP-FIG-012	Floor Plan - State/County Work Area (D2-1)	B	09-21-99
APPX-A-6	EP-FIG-013	Floor Plan - NRC Work Area (D2-4)	ORIG	03-03-98
EP-AD-19	EP-FIG-014	Population Distribution by Geographical Sub-Areas	ORIG	06-23-98
APPX-A-6	EP-FIG-022	Floor Plan - EOF	A	08-10-99
EP-EOF-12	EP-FIG-024	Map - Location of JPIC, MBC, GOB, DOB, etc.	ORIG	08-04-98
EP-SEC-5	EP-FIG-026	Site Map	A	07-21-98
APPX-A-6	EP-FIG-034	Floor Plan - Media Briefing Center	Deleted	08-04-98
EP-EOF-12 APPX-A-6	EP-FIG-035	Floor Plan - G.B. Office Building (1st Floor)	B	08-10-99
APPX-A-6	EP-FIG-037	Floor Plan - Corporate Response Center	Deleted	08-04-98
APPX-A-6	EP-FIG-038	Floor Plan - JPIC	Deleted	08-04-98
EP-OSF-2	EP-FIG-039	High Priority Work	ORIG	07-08-98
EP-OSF-2	EP-FIG-039A	Lower Priority Work	ORIG	07-08-98
APPX-A-6	EP-FIG-043	JPIC - Federal Work Area	ORIG	08-04-98
APPX-A-6	EP-FIG-044	JPIC - State and County Work Area	ORIG	08-04-98
APPX-A-6	EP-FIG-045	JPIC - Utility Work Area	ORIG	08-04-98

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

NUMBER	TITLE	REVISION	DATE
APPENDIX A			
APPX-A-1	Communication System Description	AF	08-04-98
EPIP-APPX-A-2	Response Personnel Call List	BE	12-15-99
EPIP-APPX-A-3	Off-Site, On-Site, and Company Support Telephone Numbers	BG	12-15-99
APPX-A-6	WPSC Emergency Response Facility Telephone Listing	V	08-04-98

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

FORM	TITLE	REV.	DATE
APPENDIX B			
EP-AD			
AD 7.1	Event Notice (Wisconsin Nuclear Accident Reporting Form)	O	12-15-99
AD 7.2	State Call-Back - Question Guideline	B	04-16-96
AD 11.1	Emergency Radiation Work Permit	F	04-16-96
EP-ENV			
ENV 1.1	Environmental Dispatch Area Activation Checklist	C	11-25-97
ENV 1.2	EMT Status	A	09-03-96
ENV 1.3	Meteorological and Plant Status Data	A	09-03-96
ENV 1.4	EMT Orders/Field Data	A	09-03-96
ENV 2	EMT Activation Checklist	L	02-23-99
EP-EOF			
EOF 2.1	EOF Activation Checklist	Q	08-10-99
EOF 2.2	EOF Deactivation Checklist	J	09-21-99
EOF 4.1	SRCL Initial Action Checklist	B	09-16-97
EOF 4.2	Telephone Communications Log Sheet	ORIG	04-16-96
EOF 8.3	Fax for Emergency Declaration or Status Updates	F	09-21-99
EOF 8.5	Plant Emergency Status Report	ORIG	02-21-95
EOF 8.6	Radiological Status Report	C	03-14-97
EOF 11.2	Operating Status	E	02-14-95
EOF 11.3	Environmental Status Board	E	07-31-95
EOF 12.1	I.D. Badge Registration Form	F	08-04-98
EP-OSF			
OSF 2.2	Maintenance Work in Progress	Deleted	07-08-98
OSF 3	Operational Support Facility Team Briefing	A	02-14-95
EP-RET			
RET 2A.2	Emergency Sample Worksheet	D	04-16-96
RET 2B.1	Containment Stack Release (Grab Sample)	C	04-16-96
RET 2B.2	Auxiliary Building Stack (Grab Sample)	C	04-16-96

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 01-18-2000

FORM	TITLE	REV.	DATE
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 4	SAM-II Counting Equipment Worksheet	D	04-16-96
RET 8.3	Hospital Survey 1	E	07-25-97
RET 8.4	Hospital Survey 2	Deleted	07-25-97
RET 8.5	Hospital Survey 3	Deleted	07-25-97
RET 8.6	Hospital Survey 4	E	07-25-97
RET 9	Environmental TLD Record Sheet	C	02-14-95
EP-SEC			
SEC 4.1	Emergency Dosimeter Log Security	E	04-11-95
EP-TSC			
TSC 1.1	Plant Status Summary for SAM Implementation	A	04-01-99
TSC 1.2	Severe Accident Management Summary and Strategy Recommendation	A	04-01-99
TSC 1.3	Severe Accident Management - Status	A	04-01-99
TSC 2.1	TSC and OSF Activation Checklist	N	04-01-99
TSC 2.2	TSC Ventilation Checklist	H	04-01-99
TSC 2.3	Emergency Response Data System (ERDS) Link Initiation Checklist	F	04-01-99
TSC 2.4	TSC Chart Recorder Operation Checklist	C	04-01-99
TSC 2.5	TSC and OSF De-activation Checklist	ORIG	04-01-99
TSC 3.1	Plant System Status	K	02-14-95
TSC 3.2	Plant Equipment Status	K	08-12-97
TSC 3.3	Environmental Status Board	I	04-16-96
TSC 3.4	Radiation Monitors	G	02-14-95
TSC 4.1	Emergency Design Change Request	E	08-04-98
TSC 4.2	Emergency Physical Change Safety Review	E	08-04-98

EMERGENCY PLAN IMPLEMENTING PROCEDURES**INDEX****DATE: 01-18-2000**

FORM	TITLE	REV.	DATE
TSC 4.3	Emergency Physical Change Index	E	08-04-98
TSC 7	Head Venting Calculation	E	02-14-95
TSC 8A.1	Steam Release Data Sheet (Energy Balance)	G	02-14-95
TSC 8A.2	Steam Release Calculation Sheet (Energy Balance)	F	02-14-95
TSC 8A.3	Steam Release Data/Calculation Sheet (Open Valve)	D	02-14-95
TSC 8A.4	Steam Release Data/Calculation Sheet (STMRLS Program)	C	04-16-96
TSC 9A.1	Core Damage Based on Reactor Vessel Level & Fuel Rod Temp.	C	02-14-95
TSC 9A.2	Core Damage Based on Radiation Monitors	C	02-14-95
TSC 9A.3	Cs-134 and Cs-137 PCF Determination	D	04-16-96
TSC 9A.4	Core Damage Based on Activity Ratios	C	02-14-95
TSC 9A.5	Core Damage Assessment (Monitoring Data)	D	04-16-96
TSC 9A.6	Core Damage Summary	C	02-14-95

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-15		Rev. M
	Title Recovery Planning and Termination		
	Date JAN 18 2000	Page 1 of 5	
Reviewed By <i>David Z Masarik</i>	Approved By <i>David K 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 terminating a declared emergency, establishing a recovery plan, restoring the plant to a normal operating status, and terminating recovery efforts.
- 1.2 The goals of the recovery effort are to assess the in-plant consequences of the emergency, to assist the state with the intermediate and ingestion phase radiological operations and to initiate plant cleanup and repair operations.

2.0 General Notes

- 2.1 During a declared emergency, a point is reached when the plant will be placed in a stable condition. Factors which pose a threat to the health and safety of the general public will be identified and controlled. These conditions could be attained even though specific Emergency Action Levels are exceeded. The Emergency Director, in conjunction with the Emergency Response Manager, will determine that there is no longer a need to keep the emergency organization in effect. After a decision has been made to terminate the emergency, then plant recovery operations will begin.

2.2 Definitions

- 2.2.1 Recovery - During all declared emergencies, a point will be reached at which the plant will be placed in a stable condition. Also, factors which could pose a threat to the health and safety of the general public will be identified and controlled. With the understanding that this condition could be attained even though specific Emergency Action Levels are still exceeded, the Emergency Director, in conjunction with the Emergency Response Manager, will determine that there is no longer a need to keep the emergency organization in effect and to begin plant recovery operations.

3.0 Precautions and Limitations

- 3.1 None

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 Supervisor or Emergency Director.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-15	Rev.	M
	Title	Recovery Planning and Termination		
	Date	JAN 18 2000	Page 2 of 5	

5.0 Procedure

5.1 Responsibilities

5.1.1 **Emergency Director, in conjunction with the Emergency Response Manager, will determine:**

- 5.1.1.1 At the onset of an emergency condition, response action to mitigate the consequences of the accident takes precedence over recovery actions. The Emergency Response Manager may initiate some limited recovery operation during the response phase. Gradually, as the response effort begins to abate, recovery efforts gain more importance.
- 5.1.1.2 EPIP-AD-02 is not written to facilitate de-escalation, therefore, any decision to de-escalate must be based on a thorough review of EPIP-AD-02 to determine whether any EAL applies to current plant conditions.
- 5.1.1.3 It is not required to de-escalate from an emergency action level. Moving from a given action level directly into recovery is preferable. However, there may be occasions when it is more appropriate to de-escalate.
- 5.1.1.4 Refer to and review Section 9 of the Kewaunee Nuclear Power Plant Emergency Plan.
- 5.1.1.5 Review any procedures specific to the emergency necessary to supplement this procedure.
- 5.1.1.6 Evaluate the status of emergency conditions and determine at what point in time the emergency organization can be secured and return to the normal plant and corporate organization.
- 5.1.1.7 Evaluate plant damage and on-site radiological clean-up operations needed.
- 5.1.1.8 Evaluate off-site radiological impact that may have occurred or may continue during the recovery operation.
- 5.1.1.9 Determine the manpower, equipment, and materials needed to start the recovery operation.
- 5.1.1.10 Make recommendations, if appropriate, to the Vice President - Nuclear concerning who would be best suited to fill the positions of Recovery Manager and Environmental Liaison (if needed).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-15	Rev.	M
	Title	Recovery Planning and Termination		
	Date	JAN 18 2000	Page 3 of 5	

5.1.2 Recovery Manager

- 5.1.2.1 Works with appropriate plant and corporate personnel to formulate a recovery plan which will return the Plant to a normal operating status.
- 5.1.2.2 Maintain routine contact with all appropriate Federal, State, and Local Agencies concerning recovery operations until the recovery is terminated.
- 5.1.2.3 Oversee the recovery operation based on guidance stated in Section 5.2.2 below.
- 5.1.2.4 Ensures that all new nuclear safety related procedures are reviewed by Plant Operations Review Committee (PORC) prior to use.

5.1.3 Environmental Liaison (if designated)

- 5.1.3.1 Coordinate all environmental radiological sampling and analysis performed by WPSC employees or WPSC contracted environmental monitoring personnel.
- 5.1.3.2 Maintain contact with Federal, State, and Local Agencies performing environmental radiological sampling within the EPZ.
- 5.1.3.3 Obtain sample results from Federal, State, and Local Agencies and compare these results to WPSC obtained sample results.

5.2 Requirements

- 5.2.1 Securing the Emergency Organization: The Emergency Director, in conjunction with the Emergency Response Manager, will review and address the items listed below prior to securing the emergency organization.
 - 5.2.1.1 The plant is in a shutdown condition and/or there is no apparent likelihood that the initial emergency situation will recur or that further plant degradation will develop.
 - 5.2.1.2 Radiation levels in affected in-plant areas are stable or decreasing.
 - 5.2.1.3 Releases of radioactive material to the environment greater than Technical Specifications have ceased.
 - 5.2.1.4 Containment pressure is steady or decreasing.
 - 5.2.1.5 The reactor is in a safe shutdown condition and long-term core cooling is established or is capable of normal operations within Technical Specifications.
 - 5.2.1.6 Shutdown margin as required by Technical Specifications for the core has been verified.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-15	Rev.	M
	Title	Recovery Planning and Termination		
	Date	JAN 18 2000	Page 4 of 5	

- 5.2.1.7 The possibility of an uncoolable core has been evaluated.
- 5.2.1.8 Any fire, flood, earthquake, or similar emergency conditions are controlled or have ceased.
- 5.2.1.9 All required emergency notifications have been completed.
- 5.2.1.10 There is no longer a need for the full activation of the emergency response organization or emergency response facilities.
- 5.2.2 Recovery Operation: The Manager - Kewaunee Plant and the Recovery Manager will remain cognizant of the items listed below during the recovery operation.
 - 5.2.2.1 Appropriate off-site authorities shall be informed of the recovery organization and plans, including communication links to be used.
 - 5.2.2.2 The declared emergency will be investigated and documented through the Licensee Event Report (LER) system in accordance with NAD-11.08, "Kewaunee Assessment Process (KAP)."
 - 5.2.2.3 When completed, a copy of the event LER shall be sent to:
 - a. The NRC
 - b. The State of Wisconsin, D.E.M.
 - c. The Kewaunee County Emergency Government
 - d. The Manitowoc County Emergency Management
 - 5.2.2.4 Procedures or procedure changes instituted to respond to the emergency shall be evaluated for applicability to the recovery.
 - 5.2.2.5 Plant accountability and access control status will be reviewed and appropriate procedures implemented.
 - 5.2.2.6 The PORC shall review all nuclear safety related procedures for plant recovery.
 - 5.2.2.7 An estimation of the total population radiation exposure will be calculated for any and all releases of radioactive material that took place during the declared emergency. The analysis will be performed using established procedures and using Regulatory Guide 1.109 as a reference.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-15	Rev.	M
	Title	Recovery Planning and Termination		
	Date	JAN 18 2000	Page 5 of 5	

6.0 Final Conditions

- 6.1 Recovery operations may be terminated and the plant returned to a normal operating status after the Vice President - Nuclear is confident that the plant can be maintained within Technical Specifications.

7.0 References

- 7.1 NRC Inspection Report 88-11 (COMTRAK 88-067)
- 7.2 Kewaunee Nuclear Power Plant Emergency Plan, Section 9
- 7.3 Kewaunee Nuclear Power Plant Technical Specifications and Operating License
- 7.4 Kewaunee Nuclear Power Plant USAR
- 7.5 Title 10 Code of Federal Regulations Parts 20 and 50, Appendix E
- 7.6 NRC Inspection Report K-87-195

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

WISCONSIN PUBLIC SERVICE CORPORATION		NO. EP-RET-3C	REV. O
KEWAUNEE NUCLEAR POWER PLANT		TITLE: Post Accident Operation of the High Radiation Sample Room	
EMERGENCY PLAN IMPLEMENTING PROCEDURE		DATE JAN 18 2000	PAGE 1 of 26
REVIEWED BY <i>Wally P. Short</i>		APPROVED BY <i>Kyle J. ...</i>	
NUCLEAR SAFETY RELATED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	PORC REVIEW REQUIRED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
		SRO APPROVAL OF TEMPORARY CHANGES REQUIRED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

1.0 PURPOSE

- 1.1 This procedure is to detail the requirements, considerations, and operation of the High Radiation Sample Room (HRSR) during a post LOCA condition.

2.0 GENERAL NOTES

- 2.1 This is to detail the procedures to be utilized for obtaining:
- 2.1.1 Diluted liquid sample of primary coolant for Boron Analysis and Isotopic Analysis (Section 5.1).
 - 2.1.2 An inline sample for pH, conductivity, oxygen, and chloride analysis (Section 5.2).
 - 2.1.3 An inline sample of primary coolant for Hydrogen Analysis and a dilute sample of gases, contained in Primary Coolant, for Isotopic Analysis (Section 5.3).
 - 2.1.4 An undiluted sample of Primary Coolant for off-site analysis (Section 5.4).
 - 2.1.5 Containment Hydrogen Analyzer measurement (Section 5.5).
 - 2.1.6 Flush of liquid sample lines (Section 5.6).

3.0 PRECAUTIONS AND LIMITATIONS

- 3.1 Process an Emergency Radiation Work Permit (See EP-AD-11).
- 3.2 Contact Radiation Protection Group for:
 - 3.2.1 Proper personnel dosimetry.
 - 3.2.2 Proper radiation detection instrumentation.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room	
	DATE JAN 18 2000	PAGE 2 of 26

3.2.3 Personnel for continuous HP coverage during sampling.

3.2.4 Remote area monitor readings in area of HRSR.

3.3 Utilize on-site communications with the Radiological Protection Director, as necessary, during sampling.

3.4 Containment sump pH should be adjusted to a pH >7 within 48 hours following the initiation of recirculation during a small break loss of coolant accident.

3.5 If the sample flow is lost during the performance of this procedure and the valve line-up is confirmed, a sample high temperature condition may exist. Sample flow is automatically isolated when sample temperatures exceed 120°F and automatically resets when the temperatures are reduced. If sample flow is restored without having to take action, then high temperature isolation is confirmed. No direct temperature indicator is available. Such a high temperature condition may arise if the Component Cooling flow is isolated or Component Cooling temperatures are high. Component Cooling temperatures may be observed using the plant process computer. High Component Cooling temperature may occur if Service Water temperatures are elevated.

If the loss of sample flow is confirmed to be due to high Component Cooling temperatures, discuss the concern with Operations or the Technical Support Center and discuss opportunities to reduce SW heat loads to allow for better Component Cooling cooling.

4.0 INITIAL CONDITIONS

4.1 Not Applicable

5.0 PROCEDURE

5.1 Dilute Liquid Grab Sample

5.1.1 Proceed to HRSR per HP/RPD recommendations.

5.1.2 At the CASP Control Panel, check ventilation is ON in "normal" position and High Vacuum Lights indicate "normal" for the Liquid Sample Panel (LSP) and Chemical Analytical Panel (CAP).

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room	
	DATE JAN 18 2000	PAGE 3 of 26

- 5.1.3 Check radiation levels in HRSR and in maintenance area behind panels, if access is required.
- 5.1.4 Check the following lab equipment available and operational:
- a. Drying oven on at 55°C to 60°C.
 - b. Fume hood ventilation normal.
 - c. Shielded aliquoter available.
 - d. DI water flush hoses connected to LSP and supply valve on.
 - e. New 24 ml diluted sample bottle (large bottle).
 - f. Hand operated vacuum pump.
 - g. Lights on in diluted sample port of LSP.
 - h. LSP Sample Cask available with diluted sample bottle piston installed.
 - i. Perform valve lineup per Attachment A.
 - j. Reach Rod for remote valve operation.
 - k. All material required in Section 4 of RC-C-82.
 - l. Multi-channel analyzer available for counting.
 - m. 2 - 1 liter poly bottles.
- 5.1.5 Evacuate the diluted sample bottle (25 ml, large bottle) to 15 inches of vacuum or greater. Install in sample cask and check cask for proper operation (large holder in cask).
- 5.1.6 Check level in dilution water reservoirs. Fill to full mark as necessary.
- 5.1.7 Have Control Room Operator open RC-422 and RC-423 for RCHL sample (not required for RHR sample).

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 4 of 26

- 5.1.8 At the Sample Acquisition Panel:
- a. For RCHL Sample: Open CC-314
Open RC-423-1
 - b. For RHR Sample: Open CC-316
Open RHR-81-A (81-B)
 - c. For all Samples: Turn RC-437-1 (437-2) to DDT
- 5.1.9 At the Liquid Sample Panel: Open V-3
Open V-1.2 (V-1.1 for RHR)
- 5.1.10 Regulate Reactor Coolant (RHR) flow using RC-VREL-1 until flow indicator RC-FI-1 indicates between 1900 to 2000 cc/min. Maintain this purge for a minimum of 12 minutes for RCHL and 25 minutes for RHR.
- 5.1.11 Upon completion of the purge: Close V-3
Open V-8.2
Open V-8.1
Open V-2
- 5.1.12 Regulate Reactor Coolant (or RHR) flow using RC-VREL-2 until flow indicator RC-FI-2 indicates 200 cc/min. Maintain this purge for a minimum of 3 minutes.
- 5.1.13 Check diluted sample bottle (from step 5.1.5) to ensure 15 inches of vacuum has been maintained.
- 5.1.14 Install the sample cart under the diluted sample port and position the bottle up on the needles.
- 5.1.15 Upon completion of the purge: Turn DV-1 to "Sample"
Close V-1.2 (V-1.1 for RHR)
- 5.1.16 Throttle open V-21 and add 24 ml of DI water from the graduated reservoir to the sample bottle, THEN close RC-V-21.

NOTE: *If less than 24 ml of DI water is used, note volume.*

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room	
	DATE JAN 18 2000	PAGE 5 of 26

- 5.1.17 Turn DV-1 to "Bypass."
- 5.1.18 Open V-4. Observe Flush Water Flow Rate of 200 cc/min. for a minimum of 3 minutes.
- 5.1.19 Lower the diluted sample bottle into the sample cask. Close the cask and install auxiliary shield. Place cask near fume hood.
- 5.1.20 Upon completion of flush:
- Close V-4
 - Close V-2
 - Close V-8.2
 - Close V-8.1
- 5.1.21 Have Control Room Operator shut RC-422 and RC-423 (not required for RHR).
- 5.1.22 At the Sample Acquisition Panel:
- For RCHL Sample:
 - Close RC-423-1
 - Close CC-314
 - For RHR Sample:
 - Close RHR-81-A (81-B)
 - Close CC-316
 - For all Samples:
 - Turn RC-437-1 (or 437-2) to VCT
- 5.1.23 Using the shielded liquid aliquoter, transfer a 1.0 ml sample from the sample cask into a VYCOR evaporating dish.

NOTE: *For Boron analysis of < 2000 ppm, use an appropriately larger amount of sample.*

CAUTION

If 24 ml of DI water was not used in step 5.1.16, dilution is not 1000 as assumed - dilution factor correction will be performed.

- 5.1.24 Continue the Boron analysis with step 6.2 of RC-C-82.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room	
	DATE JAN 18 2000	PAGE 7 of 26

- 5.2.6 Have the Control Room Operator open RC-422 and RC-423 (not required for RHR sample).
- 5.2.7 At the Sample Acquisition Panel:
- For RCHL Sample: Open CC-314
 Open RC-423-1
- For RHR Sample: Open CC-316
 RHR 81-A (81-B)
- For all Samples: Turn RC-437-1 (or 437-2) to DDT
- 5.2.8 At the Liquid Sample Panel: Open V-3
 Open V-1.2 (V-1.1 for RHR)
- 5.2.9 Regulate Reactor Coolant (or RHR) flow using RC-VREL-1 until flow indicator RC-FI-1 indicates between 1900 to 2000 cc/min. Maintain this purge for a minimum of 12 minutes for RCHL and 25 minutes for RHR.
- 5.2.10 Upon completion of the purge: Close V-3
 Open V-2
 Open V-7
 Turn V-22 to Chem Panel
- 5.2.11 Regulate Reactor Coolant (or RHR) flow using RC-VREL-2 until flow indicator RC-FI-2 indicates 200 cc/min. Maintain this purge for a minimum of 5 minutes.
- 5.2.12 Verify adequate flow rate to the CAP by observing the lights "ON" for both O₂ flow and IC flow.
- 5.2.13 When the YSI O₂ meter chart reading has stabilized:
- Record the conductivity reading
 - Record the temperature
 - Record the O₂ reading
 - Inject sample on IC unit

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 8 of 26

- 5.2.14 At the Liquid Sample Panel: Turn V-22 to Waste
Close V-1.2 (V-1.1 for RHR)
Open V-4
- 5.2.15 Observe DI Water Flush to Waste as indicated on Flow Indicator RC-FI-2. **After 2 minutes, record pH reading.**
- 5.2.16 Flush the CAP by turning V-22 to Chem Panel position. Verify flush water flow by observing the lights "ON" for both O₂ Flow and IC Flow. Continue flush for 2 minutes.
- 5.2.17 Upon completion of flush to CAP:
- At the LSP: Turn V-22 to Waste
Close V-7
Close V-2
Close V-4
- At the CAP: Turn V-6 to O₂ Cal
Turn V-5 to Closed
- 5.2.18 Have Control Room Operator shut RC-422 and RC-423 (not required for RHR sample).
- 5.2.19 At the Sample Acquisition Panel:
- For RCHL Sample: Close RC-423-1
Close CC-314
- For RHR Sample: Close RHR 81-A (81-B)
Close CC-316
- For all Samples: Turn RC-437-1 (or 437-2) to VCT

5.3 Hydrogen and Gaseous Activity Grab Sample

- 5.3.1 Proceed to HRSR per HP/RPD recommendations.
- 5.3.2 Verify ventilation is ON in "normal" position and high vacuum lights indicate "normal" for the CAP and LSP.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 10 of 26

5.3.8 Have Control Room Operator open RC-422 and RC-423 (not required for sample from RHR).

5.3.9 At the Sample Acquisition Panel:

For RCHL Sample: Open CC-314
 Open RC-423-1

For RHR Sample: Open CC-316
 Open RHR 81-A (81-B)

For all Samples: Turn RC-437-1 (or 437-2) to DDT

5.3.10 At the Liquid Sample Panel: Open V-3
 Open V-1.2 (V-1.1 for RHR)

5.3.11 Regulate Reactor Coolant (RHR) flow using RC-VREL-1 until flow indicator RC-FI-1 indicates between 1900 to 2000 cc/min. Maintain this purge for a minimum of 12 minutes for RCHL and 25 minutes for RHR.

5.3.12 Evacuate the Gas Expansion Vessel, sample bottle and tubing:

Open V-13
 Open V-15
 Turn DV-2 to 12 o'clock position
 Open V-12

5.3.13 When vacuum on RC-G-2.2 reads 22 inches vacuum or greater, turn DV-2 to 3 o'clock position.

5.3.14 When vacuum on RC-G-2.1 reads 22 inches of vacuum or greater:

Close V-15
 Close V-13
 Close V-10
 Turn V-11 to Closed
 Close V-12

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 11 of 26

NOTE: *Observe vacuum reading on both gauges holding steady. Rotate DV-2 to the 12 o'clock position, observe vacuum on RC-G-2.2 is holding steady, then rotate DV-2 back to the 3 o'clock position.*

5.3.15 Open V-14 and observe about 1.0 psi on RC-G-2.2.

5.3.16 Upon completion of purge (from step 5.3.11):

Close V-3
Open V-8.2
Open V-8.1
Open V-2

5.3.17 Regulate Reactor Coolant (RHR) flow using RC-VREL-2 until flow indicator RC-FI-2 indicates 200 cc/min. Maintain this purge for a minimum of 3 minutes.

5.3.18 Upon completion of sample purge:

Close V-8.2
Close V-8.1
Close V-1.2 (V-1.1 for RHR)
Open V-9
Open V-16 (for 1 full minute)

5.3.19 Upon completion of gas stripping, commence LSP flush:

Close V-16
Close V-9
Open V-8.2
Open V-8.1
Open V-4
Turn V-11 to 9 o'clock position

5.3.20 Obtain the diluted gas sample by turning DV-2 to 12 o'clock position.

5.3.21 Observe pressure gauge RC-G-2.2 stabilized at about 1 psi:

Turn DV-2 to 3 o'clock position
Close V-14

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 12 of 26

- 5.3.22 Remove the diluted gas sample bottle from the LSP and place entire assembly in fume hood for later transport to multi-channel analyzer.
- 5.3.23 At the CMP, operate the GC mini-computer to draw a vacuum on all 4 sample loops.
- 5.3.24 At the LSP, open V-15 and allow the gas sample to transfer to the GC.
- 5.3.25 Operate the GC unit to obtain 4 samples for hydrogen determination. By selective attenuation, starting with a high value, determine the hydrogen concentration.
- 5.3.26 Have Control Room Operator close RC-422 and RC-423 (not required for RHR sample).
- 5.3.27 At the Liquid Sample Panel:
- Close V-4
 - Close V-2
 - Close V-8.1
 - Close V-8.2
- 5.3.28 At the Sample Acquisition Panel:
- For RCHL Samples:
 - Close RC-423-1
 - Close CC-314
 - For RHR Sample:
 - Close RHR 81-A (81-B)
 - Close CC-316
 - For all Samples:
 - Turn RC-437-1 (or 437-2) to VCT
- 5.3.29 At the LSP, flush the expansion vessel:
- Open V-8.2
 - Open V-9
 - Turn V-11 to "DI Water" position
- Allow system to flush for 2 minutes.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room	
	DATE JAN 18 2000	PAGE 13 of 26

5.3.30 Upon completion of flush: Turn V-11 to "Argon" position (3 o'clock) and blow expansion vessel dry

5.3.31 Upon completion of drying expansion vessel:

Turn V-11 to Close (counterclockwise)
Close V-9
Close V-8.2

5.3.32 Remove radioactive gases from gas system:

Open V-10
Open V-13
Open V-15
Turn V-11 to 9 o'clock position
Open V-12

Evacuate system for 1 full minute.

5.3.33 Upon evacuation of gas system:

Close V-12
Turn V-11 clockwise to "closed" position
Close V-15
Close V-13
Close V-10

5.3.34 Transport diluted gas bottle to multi-channel analyzer for analysis per RC-C-(63).

5.4 Undiluted Liquid Grab Sample

5.4.1 Proceed to HRSR per HP/RPD recommendations.

5.4.2 Check ventilation is ON in "normal" position and high vacuum lights indicate "normal" for the LSP and CAP.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room	
	DATE JAN 18 2000	PAGE 14 of 26

- 5.4.3 Check radiation levels in HRSR and in maintenance area behind panels, if access is necessary.
- 5.4.4 Check the following lab equipment available and operational:
- a. DI water flush hoses connected to LSP and supply valve open.
 - b. Check valve lineup per Attachment A.
 - c. Reach rod for remote valve operation.
 - d. New undiluted liquid sample bottle available (15 ml bottle).
 - e. New undiluted liquid flush bottle, with special tool, available.
 - f. Sample cask available with undiluted sample piston installed.
 - g. Light on in undiluted sample port of LSP.
- 5.4.5 Install undiluted sample bottle (15 ml bottle) in cask and check for proper operation (using small sample holder).
- 5.4.6 Install the sample cask under the undiluted sample port and position the bottle up on the needles.
- 5.4.7 Have Control Room Operator open RC-422 and RC-423 (not required for RHR sample).
- 5.4.8 At the Sample Acquisition Panel:
- | | |
|------------------|-------------------------------------|
| For RCHL Sample: | Open CC 314
Open RC 423-1 |
| For RHR Sample: | Open CC 316
Open RHR 81-A (81-B) |
| For all Samples: | Turn RC-437-1 (or 437-2) to DDT |
- 5.4.9 At the Liquid Sample Panel:
- | |
|----------------------------|
| Open V-3 |
| Open V-1.2 (V-1.1 for RHR) |

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE JAN 18 2000	PAGE 15 of 26	

5.4.10 Regulate Reactor Coolant (RHR) flow using RC-VREL-1 until flow indicator RC-FI-1 indicates between 1900 to 2000 cc/min. Maintain this purge for a minimum of 12 minutes for RCHL and 25 minutes for RHR.

5.4.11 Upon completion of the purge: Close V-3
Open V-2
Open V-7

5.4.12 Regulate Reactor Coolant (RHR) flow using RC-VREL-2 until flow indicator RC-FI-2 indicates 200 cc/min. Maintain this purge for a minimum of 3 minutes.

5.4.13 Upon completion of the purge: Turn V-19 to "sample"

Observe flow into/thru sample bottle to waste. Purge time required only to insure bottle is full.

5.4.14 Upon completion of sample fill:

Turn V-19 to "bypass"
Close V-1.2 (V-1.1 for RHR)
Open V-4

5.4.15 While system is in DI water flush, return undiluted sample to cask, close lead top, and remove cask from lab. Install auxiliary shield.

NOTE: *DI water flush should be performed for a minimum of 3 minutes before going to step 5.4.16.*

5.4.16 Place undiluted sample flush bottle and special flush tool into position:

Turn V-19 to "sample"

Allow system to flush for an additional 3 minutes.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 16 of 26

5.4.17 Upon completion of sample flush:

Turn V-19 to "bypass"
Close V-7
Close V-2
Close V-4

5.4.18 Have Control Room close RC-422 and RC-423 (not required for RHR sample).

5.4.19 At the Sample Acquisition Panel:

For RCHL Sample: Close RC-423-1
Close CC-314

For RHR Sample: Close RHR-81A (81-C)
Close CC-316

For All Samples: Turn RC 437-1 (437-2) to VCT

5.4.20 If off-site shipment of an undiluted sample is required, contact a Chemistry Supervisor.

5.5 Containment Hydrogen Monitor 1A & 1B Operation Procedure

5.5.1 Proceed to HRSR per HP/RPD recommendations.

5.5.2 Check ventilation is ON in "normal" position.

5.5.3 Check radiation levels in HRSR and maintenance area behind panels, if access is necessary.

5.5.4 Check to make sure remote panels are in standby and have had 6 hours warmup time.

5.5.5 Insure heat tracing is energized and operational.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 17 of 26

5.5.6 Call the Control Room and perform the following:

- a. Verify that Containment Dome Fans 1A and 1B are operating.
- b. Notify the Control Room that both containment air sample trains will be lined up for sampling.

5.5.7 Perform the following valve lineup:

NOTE: *Due to ALARA considerations, both containment air sample trains will be lined up to preclude additional valve lineups.*

At the post-LOCA Hydrogen Control Panel:

LOCA 2A	Open
LOCA 10A	Open
SA 7003A	Open
LOCA 2B (Local/Remote)	Local
SA 7003B (Local/Remote)	Local
LOCA 2B	Open
LOCA 10B	Open
SA 7003B	Open

5.5.8 Switch selected analyzer from Standby to Analyze. Containment Hydrogen Analyzer operation cannot be performed on a sample train being used for containment air sample panel operation.

5.5.9 Switch analyzer to Sample Mode.

5.5.10 Push the remote selector pushbutton to gain control at the remote panel.

5.5.11 Allow 10 minutes for sample purge time. Read sample in percent hydrogen from remote panel meter.

5.5.12 Notify the Control Room hydrogen monitors are in service.

5.5.13 When all containment air sampling is complete, notify the Control Room that both containment air sample trains will be returned to normal.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 18 of 26

5.5.14 Perform the following valve lineup:

LOCA 2A	Close
LOCA 10A	Close
SA 7003A	Close
LOCA 2B	Close
LOCA 10B	Close
SA 7003B	Close
LOCA 2B (Local/Remote)	Remote
SA 7003B (Local/Remote)	Remote

5.6 Flush of Liquid Sample Lines

NOTE: *The purpose of this section is to reduce radiation levels behind the liquid sample panel during post accident conditions.*

5.6.1 At the Sample Acquisition Panel, place:

RC-437-1 or RC-437-2 to D.D.T.
FPC-51 Open

For RCHL Flush:
FPC-51-14 Open
RC-423-1 Open
CC-314 Open

For RHR Flush:
FPC-51-41 Open
CC-316 Open

5.6.2 At the Liquid Sample Panel:

For RCHL Flush:
RC-V-1.2 Open
RC-V-2 Open
RC-V-7 Open

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 19 of 26

For RHR Flush:

RC-V-1.1	Open
RC-V-2	Open
RC-V-7	Open

5.6.3 Throttle open RC-VREL-2 for a flow of 200 cc/min. as indicated on RC-FI-2. Allow this flow for a minimum of 45 minutes.

5.6.4 At the completion of the flush:

For RCHL:

FPC-51	Close
FPC-51-14	Close
RC-423-1	Close
CC-314	Close
RC-V-1.2	Close
RC-V-2	Close
RC-V-7	Close
RC-VREL-2	Throttle Near Closed

For RHR:

FPC-51	Close
CC-316	Close
RC-V-1.1	Close
RC-V-2	Close
RC-V-7	Close
RC-VREL-2	Throttle Near Closed

5.6.5 Continue the flush by using the D.I. water connection at RC-V-4.

RC-V-4	Open
RC-V-3	Open

5.6.6 Throttle open RC-VREL-1 until positive indication is shown on RC-FI-1. Allow flow for minimum of 15 minutes or until radiation levels behind the LSP stabilize.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room		
	DATE	JAN 18 2000	PAGE 20 of 26

5.6.7 Flush is now complete. Return panel to normal.

	RC-V-3	Close
	RC-V-4	Close
	RC-VREL-1	Throttle Near Closed

6.0 FINAL CONDITIONS

| 6.1 Not Applicable

7.0 REFERENCES

- 7.1 Sentry HRSS Operating and Maintenance Manual
- 7.2 RC-C-82, Boron Analysis Curcumin Method
- | 7.3 RC-C-201, HRSR Conductivity, YSI Dissolved Oxygen, and pH Analysis
- | 7.4 RC-C-202, Hydrogen - Gas Chromatography (G.C.) Analysis
- | 7.5 RC-C-203, HRSR Post Accident Chloride-Ion Chromatography (IC) Analysis
- 7.6 Commitment PLS-84-022 RQMT 2 - step 5.3.14 (NOTE)
- 7.7 Commitment TEC-84-005, step 5.1.13 & 5.1.14
- 7.8 EP-AD-11, Emergency Radiation Controls
- 7.9 OEA 93-160
- | 7.10 KAP 1136, Corrective Action 2

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3C	REV. O
	TITLE: Post Accident Operation of the High Radiation Sample Room	
	DATE JAN 18 2000	PAGE 21 of 26

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

ATTACHMENT A
VALVE LINEUP SHEET

EP-RET-3C
Rev. O
JAN 18 2000
Page 22 of 26

Sample Acquisition Panel

FPC-51	Sample Flush Line Iso	Closed
FPC-51-41	RHR Sample Flush	Closed
RHR 81-A	RHR Smpl Iso A Aux Cool	Closed
RHR 81-B	RHR Smpl Iso B Aux Cool	Closed
FPC 51-14	RCHL Smpl Flush	Closed
RC-423-1	RCHL Smpl	Closed
FPC-51-31	M/B Demin Inlet Flush	Closed
LD-71	M/B Demin Inlet Iso	Closed
LD-75	M/B Demin Inlet Smpl	Closed
FPC-51-21	M/B Demin Outlet Flush	Closed
LD-81	M/B Demin Outlet Iso	Closed
LD-85	M/B Demin Outlet Smpl	Closed
FPC-51-12	Pzr Stm Sp Smpl Flush	Closed
RC-403-1	Przr Stm Sp Smpl	Closed
FPC-51-13	Pzr Liq Sp Smpl Flush	Closed
RC-413-1	Pzr Liq Sp Smpl	Closed
CC-314	Rx Cool HRS Hx CC Flow	Closed
CC-316	RHR HRS Hx CC Flow	Closed
MGR-545	VCT Gas Sp Smpl Iso A	Closed
MGR-545-1	VCT Gas SP Smpl Iso B	Closed
RC-437-1	Smpl Purge Divert A	To VCT
RC-437-2	Smpl Purge Divert B	To VCT

ATTACHMENT A
VALVE LINEUP SHEET

EP-RET-3C
Rev. 0
JAN 18 2000
Page 23 of 26

Liquid Sample Panel

V-17	Open Grab Sample	Closed
V-6.1	Rem Smpl Bomb Inlet	Closed
V-6.2	Rem Smpl Bomb Outlet	Closed
V-5.1	Rem Smpl Bomb Inlet Iso	Closed
V-5.2	Rem Smpl Bomb Outlet Iso	Closed
V-REL-1	RC Purge Throttle	Throttled
V-3	RC Purge Stop	Closed
V-REL-2	RC Purge to Waste Tk	Throttled
V-7	Smpl Bomb Bypass	Closed
V-2	RC Purge to Waste Stop	Closed
V-1.1	RHR Smpl Iso	Closed
V-1.2	RCHL/Pzr Smpl Iso	Closed
V-1.3	(Spare)	Closed
V-1.4	(Spare)	Closed
V-1.5	VCT Gas Sp Smpl Iso	Closed
V-4	DI Water Flush Iso	Closed
V-8.1	Press Smpl Bomb Inlet	Closed
V-8.2	Press Smpl Bomb Outlet	Closed
V-9	Expansion Vessel Inlet	Closed
V-16	Argon Gas Strip Purge	Closed
V-18	RC Backflush	6 o'clock
V-19	Undiluted Liq Smpl	Bypass
V-22	RC Purge Waste/CAP	Waste
DV-1	Diluted Liquid Sample	Bypass
V-11	Expansion Vessel Outlet	Closed
DV-2	Diluted Gas Smpl	3 o'clock
V-10	Expansion Vessel Vacuum	Closed

ATTACHMENT A
VALVE LINEUP SHEET

EP-RET-3C
Rev. O
JAN 18 2000
Page 24 of 26

Liquid Sample Panel (Cont'd)

V-13	Dil Gas Smpl Vac	Closed
V-14	Argon Purge to Dil Gas Smpl	Closed
V-15	Gas Smpl to GC	Closed
V-12	Air to Eductor	Closed

Liquid Sample Panel (Demin Section)

DMV-1.1	CVCS Demin Inlet Iso	Closed
DMV-1.2	CVCS Demin Outlet Iso	Closed
DMV-1.3	(Spare)	Closed
DMV-3	DI Water Flush	Closed
DMV-2.1	CVCS Demin Inlet Smpl	Closed
DMV-2.2	CVCS Demin Outlet Smpl	Closed
DMV-2.3	(Spare)	Closed

CASP Control Panel

AV-1/SV-1.2	Smpl Pos #1 Inlet/Outlet	Closed
SV-2.1/SV-2.2	Smpl Pos #2 Inlet/Outlet	Closed
SV-3.1/SV-3.2	Smpl Pos #3 Inlet/Outlet	Closed
SV-4.1/SV-4.2	Smpl Pos #4 Inlet/Outlet	Closed
SV-5	Smpl Bypass	Closed
SV-10	Air to Eductor	Closed
AV-2	Return to Containment	Closed
SV-6	Eductor Suction Iso	Closed

(At Sample Acquisition Panel)

AS110A	Cont Air Smpl A Iso	Closed
AS110B	Cont Air Smpl B Iso	Closed

ATTACHMENT A
VALVE LINEUP SHEET

EP-RET-3C
Rev. O
JAN 18 2000
Page 25 of 26

Chemical Analytical Panel

V-2	IC Smpl Outlet	Open
V-5	IC Loop Select	Closed
V-6	O ₂ Loop Select	O ₂ - Cal
V-7	O ₂ Analyzer Select	YSI
V-8	O ₂ Loop Outlet	Open
V-9	O ₂ Anal Cal Supply	Closed
V-10	Inst Air Supply	Open
V-11	DI Water Supply	Open
V-12	Nitrogen Supply	Open
V-14	Argon Supply to GC	Open
V-15	Cal-3 Supply	Open
V-17	O ₂ Cal Tk Recirc	Closed
V-18	O ₂ Cal Tk Drain	Closed
V-19	Cal-3 Drain	Closed
V-20	pH Cal Tk 2 Drain	Closed
V-13	IC Inject Port	Closed
V-16	pH Cal Tk 2 Supply	Closed
V-25	pH Cal Tk 1 Drain	Closed
V-27	pH Cal Tk 1 N2 Supply	Vent
V-28	pH Cal Tk 2 N2 Supply	Vent
V-29	Cal-3 N2 Supply	Vent
V-30	pH Cal Tk Select	Cal-1
V-26	pH Cal Tk 1 Supply	Closed
V-24	O ₂ Cal Tk Fill	Closed

ATTACHMENT A
VALVE LINEUP SHEET

EP-RET-3C
Rev. 0
JAN 18 2000
Page 26 of 26

I.M.C.C. Control Panel

HS-3	Dilution Water Bite Valve	Off
HS-4	Air/Water Flush Valve	Off
HS-5	Pressurized Reactor Cool. to I.M.C.C.	Off
HS-6	Reactor Cool. Bite Valve	Off
HS-7	Mixing Chamber Flush/Vent Valve	Off
HS-8	Undil. RX. Cool. Smpl. Outlet Valve	Off
HS-9	Undil. RX. Cool. Smpl/Divert Valve	Off

I.M.C.C. Control Panel

HS-10	Mixing Chamber Outlet Valve	Off
HS-11	Dil. RX. Cool. Smpl. Outlet Valve	Off
HS-12	Depressurized RX. Cool. to I.M.C.C.	Off
HS-13	Degassifier Outlet/Flush Valve	Off
HS-14	Dil. Wtr. Outlet Valve	Off
HS-15	Air Flush to Mixing Chamber	Off
HS-16	Gas Marinelli Bypass Valve	Off
Main Power Switch		On

WISCONSIN PUBLIC SERVICE CORPORATION		NO. EP-RET-3D	REV. M
KEWAUNEE NUCLEAR POWER PLANT		TITLE: Containment Air Sampling Analysis Using CASP	
EMERGENCY PLAN IMPLEMENTING PROCEDURE		DATE JAN 18 2000	PAGE 1 of 8
REVIEWED BY <u>Wally P. Smith</u>		APPROVED BY <u>Kyle J. Deane</u>	
NUCLEAR SAFETY RELATED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	PORC REVIEW REQUIRED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
		SRO APPROVAL OF TEMPORARY CHANGES REQUIRED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

1.0 PURPOSE

Containment samples will be drawn and analyzed following an **Alert, Site Emergency, General Emergency** or when directed by the Radiological Protection Director (RPD).

2.0 GENERAL NOTES

- 2.1 This procedure is to detail the requirements, considerations, and operations of the Containment Air Sample Panel (CASP) during a POST LOCA condition, to obtain a grab sample of containment air for gross gas, iodine, hydrogen and oxygen analyses.

3.0 PRECAUTIONS AND LIMITATIONS

- 3.1 Process an Emergency Radiation Work Permit (See EP-AD-11).
- 3.2 Contact the Radiation Protection Group for:
- Proper personnel dosimetry.
 - Proper radiation detection instrumentation.
 - Personnel for continuous HP coverage during sampling.
 - Remote area monitor readings in area of HRSR.
- 3.3 Utilize on-site communications with the RPD as necessary during sampling.
- 3.4 Any sample drawn from the post-accident containment atmosphere should be assumed to contain specific activity of the following magnitude.

GAS	5.0	Millicuries/cc
IODINE	0.2	Millicuries/cc

4.0 INITIAL CONDITIONS - N/A

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3D	REV. M
	TITLE: Containment Air Sampling Analysis Using CASP		
	DATE	JAN 18 2000	PAGE 2 of 8

5.0 PROCEDURE

5.1 Obtain all necessary equipment prior to beginning to sample the containment atmosphere. This equipment includes:

5.1.1 Operable CASP System with ISC Cart in Sample Station #1

5.1.2 5.0 microliter gas syringe (2)

5.1.3 1.0 cc gas syringe (2)

5.1.4 An iodine cartridge holder (1)

5.1.5 Silver Zeolite Cartridge (1)

5.1.6 Several small rubber stoppers (5-6)

5.1.7 Portable shields transporting syringes

5.1.8 Marinelli beaker (given to HP to be counted prior to sample injection)

5.1.9 Specially adapted liter bottle per step 5.5.2

5.2 Containment Air Sample Panel Operation

5.2.1 Proceed to HRSR per HP/RPD recommendations.

5.2.2 Check radiation levels in HRSR and in maintenance area behind panels, if access is required.

5.2.3 Ensure that heat tracing is ON.

5.2.4 Check ventilation is ON and in "normal" position and high vacuum lights indicate "normal" for the LSP and CAP, and CASP.

5.2.5 Ensure that instrument air supply is available at ≥ 70 psi.

5.2.6 Verify that CASP and CASP control panels are energized and operational.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3D	REV. M
	TITLE: Containment Air Sampling Analysis Using CASP		
	DATE	JAN 18 2000	PAGE 3 of 8

5.2.7 Check valve lineup per Attachment A of EP-RET-3D.

5.2.8 Check the Inline sample cart ISC in the #1 position is locked in place. Check cart is properly locked in by trying to pull away.

NOTE: *Only Sample Station 1 should be used for Iodine Analysis.*

5.2.9 Call Control Room and verify Dome Fans 1A and 1B are operational. If available, both containment air sample trains will be lined up for sampling.

NOTE: *Due to ALARA considerations, if available, both containment air sample trains will be lined up to preclude additional valve lineups.*

5.2.10 Request Operations perform the following valve lineup:

At the post-LOCA Hydrogen Control Panel:

LOCA 2A	Open
LOCA 10A	Open
SA 7003A	Open
LOCA 2B (Local/Remote)	Local
SA 7003B (Local/Remote)	Local
LOCA 2B	Open
LOCA 10B	Open
SA 7003B	Open

5.2.11 Insure that when selecting Sample Loop A or B that either hydrogen monitor is not operating or loop selected is opposite that being used by H₂ monitor.

5.2.12 Open AS110A or AS110B.

5.2.13 CASP two minute presample back flush.

SV-10	OPEN
SV-6	OPEN
SV-5	OPEN

Ensure flow monitor on CASP is indicating flow.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3D	REV. M
	TITLE: Containment Air Sampling Analysis Using CASP		
	DATE	JAN 18 2000	PAGE 4 of 8

5.2.14 Three minute sample purge:

AV-1/SV 1.2	OPEN
SV-5	CLOSED
AV-2	OPEN

5.2.15 At the ISC Cart:

V-4	OPEN
V-6	OPEN
V-5	CLOSED

Ensure CASP flow monitor is indicating flow.

5.3 Sample Collection

5.3.1 Close SV-6. Flow monitor on CASP should go out. Wait 1 minute for pressure equalization.

5.3.2 Withdraw two 1 cc samples and two 5 microliter samples of the containment atmosphere from the ISC. If necessary due to radiological concerns, lock the tips, insert the needle of each syringe in a rubber stopper to prevent damage, and place the syringes in a portable shield for transport.

5.3.3 Use a predetermined route to minimize personnel exposure while transporting the shielded syringes or samples for analysis.

5.4 System Shutdown and Cleanout

5.4.1 Shut AS110A or AS110B.

5.4.2 Open SV-6 to evacuate the ISC cart for 2 minutes.

5.4.3 Shut ISC cart inlet valve (V-4) and outlet valve (V-6). Open bypass valve (V-5).

5.4.4 Open AS110A or AS110B and shut AV-2. Continue this backflush for 2 minutes. Flow monitor should indicate flow.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3D	REV. M
	TITLE: Containment Air Sampling Analysis Using CASP		
	DATE	JAN 18 2000	PAGE 5 of 8

5.4.5 Open SV-5, shut AV-1/SV1.2. Continue this backflush for 1 minute. Flow monitor should indicate flow.

5.4.6 Shut SV-10, SV-6, SV-5, and AS110A or AS110B.

5.4.7 After cart is flushed, reset "Active/Inactive" indicator lights to "Inactive".

5.5 Iodine Analysis

5.5.1 Place a Silver Zeolite sample cartridge in a holder. Attach a hose from the holder to a vacuum source in the HRSR Fume Hood and establish air flow through the filter cartridge.

5.5.2 Inject 5.0 microliters of the samples gas upstream of the filter cartridge allowing the gas to flow through the Silver Zeolite cartridge.

5.5.3 Remove the Silver Zeolite cartridge from its holder and monitor it for radiation.

5.5.4 Transfer the Silver Zeolite cartridge to the Radiation Protection Group for counting.

5.5.5 If the Count Room is not accessible, the cartridge may be sent to Point Beach Nuclear Plant for analysis. They use an identical geometry for counting iodine samples.

5.6 Gross Gas Analysis

5.6.1 Ensure the Radiation Protection Group has performed a background count on the marinelli beaker, inject 5 microliters of sample into it. Return the marinelli beaker to the Radiation Protection Group for counting.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO. EP-RET-3D	REV. M
	TITLE: Containment Air Sampling Analysis Using CASP	
	DATE JAN 18 2000	PAGE 6 of 8

NOTE: *Extra dilution may be necessary for counting.*

5.6.2 If the Count Room is nonhabitable or if the multi-channel analyzer is saturated from background radiation and inoperable, the sample may have to be sent to Point Beach Nuclear Plant for counting. In this case, instead of injecting the 5.0 microliters of sample into a marinelli beaker, inject it into a specially adapted 1.0 liter poly bottle. The bottle may then be counted for gross gas activity at Point Beach Nuclear Plant in the liter bottle geometry. If this is done, use a dilution factor of $2.0 \text{ E} + 5$ to determine actual activity in containment.

5.7 Hydrogen and Oxygen Analyses

5.7.1 Refer to chemistry procedure RC-C-80 or RC-C-80C for gas chromatograph operation.

5.7.2 Ensure that the gas chromatograph is turned on and the unit is operating properly.

5.7.3 After checking the calibration and operation of the gas chromatograph, inject the contents of the 1.0 cc syringe into the gas partitioner and await results on the chart recorder.

5.7.4 Report all results obtained to the RPD.

6.0 FINAL CONDITIONS

6.1 When all containment air sampling is complete, notify the Control Room that both containment air sample trains will be returned to normal.

WISCONSIN PUBLIC SERVICE CORPORATION KEWAUNEE NUCLEAR POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURE	NO.	EP-RET-3D	REV. M
	TITLE: Containment Air Sampling Analysis Using CASP		
	DATE	JAN 18 2000	PAGE 7 of 8

6.2 Request Operations perform the following valve lineup:

At the post-LOCA Hydrogen Control Panel:

LOCA 2A	Closed
LOCA 10A	Closed
SA 7003A	Closed
LOCA 2B	Closed
LOCA 10B	Closed
SA 7003B	Closed
LOCA 2B (Local/Remote)	Remote
SA 7003B (Local/Remote)	Remote

7.0 REFERENCES

- 7.1 Sentry HRSS Operating and Maintenance Manual
- 7.2 EP-AD-11, "Emergency Radiation Controls"
- 7.3 RC-C-80, "Gas Chromatograph, Baseline 1010 Operation"
- 7.4 RC-C-80C, "Operation of the SRI 8610 Gas Chromatograph"
- 7.5 TS 6.11.b.2

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

ATTACHMENT A
VALVE LINEUP SHEET

CASP Control Panel

AV-1/SV-1.2	Smpl Pos #1	Inlet/Outlet	CLOSE
SV-2.1/SV-2.2	Smpl Pos #2	Inlet/Outlet	CLOSE
SV-3.1/SV-3.2	Smpl Pos #3	Inlet/Outlet	CLOSE
SV-4.1/SV-4.2	Smpl Pos #4	Inlet/Outlet	CLOSE
SV-5	Smpl Bypass		CLOSE
SV-10	Instr. Air to Eductor		CLOSE
AV-2	Return to Containment		CLOSE
SV-6	Eductor Suction Isol		CLOSE

(At Sample Acquisition Panel)

AS110A	Cont Air Smpl A Isol	CLOSE
AS110B	Cont Air Smpl B Isol	CLOSE

KEWAUNEE NUCLEAR POWER PLANT

February 1, 2000

EMERGENCY PLAN IMPLEMENTING PROCEDURES TRANSMITTAL FORM

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- N. Deda - SBF/SEC (114)
- M. Anderson - CR/Communicator (116)(Partial Distribution)
- Simulator/Communicator (117)
- J. Fletcher - Security (121)
- N. Deda - Security Building (120)
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Originals to KNPP QA Vault

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EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

PROC. NO.	TITLE	REV.	DATE
EP-AD			
EP-AD-1	Plant Personnel Response to an Emergency	E	03-16-99
EP-AD-2	Emergency Class Determination	Y	12-15-98
EP-AD-3	KNPP Response to an Unusual Event	Z	01-19-99
EP-AD-4	KNPP Response to Alert or Higher	AA	01-19-99
EP-AD-5	Site Emergency	Deleted	04-27-87
EP-AD-5	Emergency Response Organization Shift Relief Guideline	A	10-13-98
EP-AD-6	General Emergency	Deleted	04-24-87
EPIP-AD-07	Initial Emergency Notifications	AK	02-01-2000
EP-AD-8	Notification of Alert or Higher	Deleted	02-26-96
EP-AD-9	Notification of Site Emergency	Deleted	04-27-87
EP-AD-10	Notification of General Emergency	Deleted	04-27-87
EP-AD-11	Emergency Radiation Controls	P	08-10-99
EP-AD-12	Personnel Assembly and Accountability	Deleted	03-26-94
EP-AD-13	Personnel Evacuation	Deleted	04-25-94
EP-AD-13A	Limited Area Evacuation	Deleted	03-01-83
EP-AD-13B	Emergency Assembly/Evacuation	Deleted	03-01-83
EP-AD-13C	Site Evacuation	Deleted	03-01-83
EP-AD-14	Search and Rescue	Deleted	05-25-94
EPIP-AD-15	Recovery Planning and Termination	M	01-18-2000
EP-AD-16	Occupational Injuries or Vehicle Accidents During Emergencies	Deleted	03-14-97
EP-AD-17	Communications	Deleted	03-05-84
EP-AD-18	Potassium Iodide Distribution	M	07-25-97
EP-AD-19	Protective Action Guidelines	O	06-23-98
EP-ENV			
EP-ENV-1	Environmental Monitoring Group Organization and Responsibilities	T	02-23-99
EP-ENV-2	Environmental Monitoring Team Activation	V	02-23-99

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

PROC. NO.	TITLE	REV.	DATE
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-3C	Dose Projection Using RASCAL Version 2.2 Software	T	12-29-99
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
EP-ENV-4A	Portable Survey Instrument Use	R	02-23-99
EP-ENV-4B	Air Sampling and Analysis	U	02-23-99
EP-ENV-4C	Environmental Monitoring Teams	Deleted	04-13-90
EP-ENV-4C	Ground Deposition Sampling and Analysis	U	02-23-99
EP-ENV-4D	Plume Tracking for Environmental Monitoring Teams	L	02-23-99
EP-ENV-5A	LCS-1 Operation	Deleted	04-14-86
EP-ENV-5B	MS-3 Operation	Deleted	04-14-86
EP-ENV-5C	SAM II Operation	Deleted	04-14-86
EP-ENV-5D	PAC-4G (Alpha Counter) Operation	Deleted	04-14-86
EP-ENV-5E	Reuter-Stokes Operation	Deleted	08-27-85
EP-ENV-6	Data Analysis, Dose Projections and Protective Action Recommendations	Deleted	12-21-81
EP-ENV-6	Alternate Sample Analysis and Relocation of EM Team	Deleted	04-14-86
EP-ENV-6A	Relocation of Site Access Facility (Habitability)	Deleted	03-23-84
EP-ENV-6B	SAF Environmental Sample Analysis Relocation	Deleted	03-23-84
EP-ENV-7	Site Access Facility Communications	Deleted	09-26-84
EP-ENV-8	Total Population Dose Estimate Calculations	Deleted	04-14-86

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

PROC. NO.	TITLE	REV.	DATE
EP-EOF			
EP-EOF-1	Corporate Emergency Response Organization	Deleted	03-11-94
EP-EOF-2	Emergency Operations Facility (EOF) Activation	W	08-10-99
EP-EOF-3	Corporate Action for Unusual Event	Y	03-16-99
EP-EOF-4	Corporate Action for Alert or Higher	AE	03-16-99
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
EP-EOF-8	Continuing Emergency Notifications	R	08-31-99
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
EP-EOF-11	Internal Communication and Documentation Flow	S	03-16-99
EP-EOF-12	Media Center/Emergency Operation Facility/Joint Public Information Center Security	N	08-10-99
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
EP-OSF-2	Operational Support Facility Operations	R	07-27-99
EP-OSF-3	Work Requests During an Emergency	M	09-21-99
EP-OSF-4	Operational Support Facility Communications	Deleted	04-24-87
EPIP-OSF-04	Search and Rescue	C	12-15-99

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

PROC. NO.	TITLE	REV.	DATE
EP-RET			
EP-RET-1	Radiation Emergency Team Organization	Deleted	04-16-96
EP-RET-2	In-Plant Radiation Emergency Team	R	07-27-99
EP-RET-2A	RPO - RAF Activation	Q	07-27-99
EP-RET-2B	Gaseous Effluent Sample and Analysis	Q	03-03-98
EP-RET-2C	Containment Air Sampling and Analysis	Deleted	03-01-83
EP-RET-2D	Emergency Radiation Entry Controls and Implementation	L	07-27-99
EP-RET-2E	Handling of Injured Personnel	Deleted	04-16-96
EP-RET-2F	Personnel Decontamination	Deleted	04-13-90
EPIP-RET-03	Chemistry Emergency Team	O	02-01-2000
EP-RET-3A	Liquid Effluent Release Paths	K	01-12-99
EP-RET-3B	Post-Accident Reactor Coolant Alternate Sampling Procedure	Deleted	01-25-88
EP-RET-3C	Post Accident Operation of the High Radiation Sample Room	O	01-18-2000
EP-RET-3D	Containment Air Sampling Analysis Using CASP	M	01-18-2000
EP-RET-3E	Post Accident Operation of High Rad Sample Room Inline Multiported Count Cave	Deleted	08-27-85
EP-RET-4	SBF Activation	P	07-27-99
EP-RET-4A	EOF Radiological Monitoring	Deleted	03-10-83
EP-RET-4A	SBF Operation/Relocation	C	07-27-99
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
EP-RET-5	Site Boundary Dose Rates During Controlled Plant Cooldown	F	07-21-98
EP-RET-5A	Plume Projection	Deleted	04-27-87
EP-RET-6	Dose Projection	Deleted	04-24-87

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

PROC. NO.	TITLE	REV.	DATE
EP-RET-7	Radiological Analysis Facility/Radiation Protection Office Communications	Deleted	04-24-87
EP-RET-8	Contamination Control of the Two Rivers Community Hospital	N	08-04-98
EP-RET-9	Post-Accident Population Dose	J	08-10-99
EP-SEC			
EP-SEC-1	Security Organization	Deleted	04-24-87
EP-SEC-2	Security Force Response to Emergencies	S	09-21-99
EP-SEC-2A	Manual Activation of Emergency Sirens	Deleted	04-16-82
EP-SEC-3	Personnel Assembly and Accountability	W	11-10-98
EP-SEC-4	Security Force Actions for Dosimetry Issue	N	09-21-99
EP-SEC-5	Security Force Response to the EOF	Deleted	07-28-88
EP-SEC-5	Personnel Evacuation	D	07-21-98
EP-TSC			
EP-TSC-1	Technical Support Center Organization and Responsibilities	O	04-01-99
EP-TSC-2	Technical Support Center Activation	Q	04-01-99
EP-TSC-3	Plant Status Procedure	T	07-21-98
EP-TSC-4	Emergency Physical Changes, Major Equipment Repair	K	08-10-99
EP-TSC-5	Technical Support Center Communications Equipment	Deleted	04-24-87
EP-TSC-6	Assessment of Reactor Core Damage	Deleted	09-30-86
EP-TSC-7	RV Head Venting Time Calculation	G	05-26-94
EP-TSC-8A	Calculations for Steam Release from Steam Generators	L	02-23-99
EP-TSC-8B*	STMRLS Computer Program	D	04-16-96
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			

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

PROC. NO.	TITLE	REV.	DATE
EP-TSC-9	Core Damage Assessment Using Released Radionuclides	Deleted	09-30-86
EP-TSC-9A*	Core Damage Assessment	I	02-23-99
EP-TSC-9B*	CORE Computer Program	H	04-16-96
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.			
EP-TSC-10	Technical Support for IPEOP's	G	04-01-99

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

FIGURES				
EPIP	FIG #	DESCRIPTION	REV.	DATE
EP-SEC-5 APPX-A-6	EP-FIG-003	Floor Plan - Technical Support Center	ORIG	03-03-98
APPX-A-6	EP-FIG-005	Floor Plan - Site Boundary Facility	ORIG	03-03-98
APPX-A-6	EP-FIG-008	Floor Plan - Radiological Analysis Facility	ORIG	03-03-98
EP-EOF-12 Form EOF 2.1	EP-FIG-009	Floor Plan - Division Office Building (2nd Floor)	A	08-10-99
APPX-A-6	EP-FIG-012	Floor Plan - State/County Work Area (D2-1)	B	09-21-99
APPX-A-6	EP-FIG-013	Floor Plan - NRC Work Area (D2-4)	ORIG	03-03-98
EP-AD-19	EP-FIG-014	Population Distribution by Geographical Sub-Areas	ORIG	06-23-98
APPX-A-6	EP-FIG-022	Floor Plan - EOF	A	08-10-99
EP-EOF-12	EP-FIG-024	Map - Location of JPIC, MBC, GOB, DOB, etc.	ORIG	08-04-98
EP-SEC-5	EP-FIG-026	Site Map	A	07-21-98
APPX-A-6	EP-FIG-034	Floor Plan - Media Briefing Center	Deleted	08-04-98
EP-EOF-12 APPX-A-6	EP-FIG-035	Floor Plan - G.B. Office Building (1st Floor)	B	08-10-99
APPX-A-6	EP-FIG-037	Floor Plan - Corporate Response Center	Deleted	08-04-98
APPX-A-6	EP-FIG-038	Floor Plan - JPIC	Deleted	08-04-98
EP-OSF-2	EP-FIG-039	High Priority Work	ORIG	07-08-98
EP-OSF-2	EP-FIG-039A	Lower Priority Work	ORIG	07-08-98
APPX-A-6	EP-FIG-043	JPIC - Federal Work Area	ORIG	08-04-98
APPX-A-6	EP-FIG-044	JPIC - State and County Work Area	ORIG	08-04-98
APPX-A-6	EP-FIG-045	JPIC - Utility Work Area	ORIG	08-04-98

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

NUMBER	TITLE	REVISION	DATE
APPENDIX A			
APPX-A-1	Communication System Description	AF	08-04-98
EPIP-APPX-A-2	Response Personnel Call List	BE	12-15-99
EPIP-APPX-A-3	Off-Site, On-Site, and Company Support Telephone Numbers	BG	12-15-99
APPX-A-6	Wpsc Emergency Response Facility Telephone Listing	V	08-04-98

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

FORM	TITLE	REV.	DATE
APPENDIX B			
EP-AD			
AD 7.1	Event Notice (Wisconsin Nuclear Accident Reporting Form)	P	02-01-2000
AD 7.2	State Call-Back - Question Guideline	B	04-16-96
AD 11.1	Emergency Radiation Work Permit	F	04-16-96
EP-ENV			
ENV 1.1	Environmental Dispatch Area Activation Checklist	C	11-25-97
ENV 1.2	EMT Status	A	09-03-96
ENV 1.3	Meteorological and Plant Status Data	A	09-03-96
ENV 1.4	EMT Orders/Field Data	A	09-03-96
ENV 2	EMT Activation Checklist	L	02-23-99
EP-EOF			
EOF 2.1	EOF Activation Checklist	Q	08-10-99
EOF 2.2	EOF Deactivation Checklist	J	09-21-99
EOF 4.1	SRCL Initial Action Checklist	B	09-16-97
EOF 4.2	Telephone Communications Log Sheet	ORIG	04-16-96
EOF 8.3	Fax for Emergency Declaration or Status Updates	F	09-21-99
EOF 8.5	Plant Emergency Status Report	ORIG	02-21-95
EOF 8.6	Radiological Status Report	C	03-14-97
EOF 11.2	Operating Status	E	02-14-95
EOF 11.3	Environmental Status Board	E	07-31-95
EOF 12.1	I.D. Badge Registration Form	F	08-04-98
EP-OSF			
OSF 2.2	Maintenance Work in Progress	Deleted	07-08-98
OSF 3	Operational Support Facility Team Briefing	A	02-14-95
EP-RET			
RET 2A.2	Emergency Sample Worksheet	D	04-16-96
RET 2B.1	Containment Stack Release (Grab Sample)	C	04-16-96
RET 2B.2	Auxiliary Building Stack (Grab Sample)	C	04-16-96

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

FORM	TITLE	REV.	DATE
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 4	SAM-II Counting Equipment Worksheet	D	04-16-96
RET 8.3	Hospital Survey 1	E	07-25-97
RET 8.4	Hospital Survey 2	Deleted	07-25-97
RET 8.5	Hospital Survey 3	Deleted	07-25-97
RET 8.6	Hospital Survey 4	E	07-25-97
RET 9	Environmental TLD Record Sheet	C	02-14-95
EP-SEC			
SEC 4.1	Emergency Dosimeter Log Security	E	04-11-95
EP-TSC			
TSC 1.1	Plant Status Summary for SAM Implementation	A	04-01-99
TSC 1.2	Severe Accident Management Summary and Strategy Recommendation	A	04-01-99
TSC 1.3	Severe Accident Management - Status	A	04-01-99
TSC 2.1	TSC and OSF Activation Checklist	N	04-01-99
TSC 2.2	TSC Ventilation Checklist	H	04-01-99
TSC 2.3	Emergency Response Data System (ERDS) Link Initiation Checklist	F	04-01-99
TSC 2.4	TSC Chart Recorder Operation Checklist	C	04-01-99
TSC 2.5	TSC and OSF De-activation Checklist	ORIG	04-01-99
TSC 3.1	Plant System Status	K	02-14-95
TSC 3.2	Plant Equipment Status	K	08-12-97
TSC 3.3	Environmental Status Board	I	04-16-96
TSC 3.4	Radiation Monitors	G	02-14-95
TSC 4.1	Emergency Design Change Request	E	08-04-98
TSC 4.2	Emergency Physical Change Safety Review	E	08-04-98
TSC 4.3	Emergency Physical Change Index	E	08-04-98

EMERGENCY PLAN IMPLEMENTING PROCEDURES

INDEX

DATE: 02-01-2000

FORM	TITLE	REV.	DATE
TSC 7	Head Venting Calculation	E	02-14-95
TSC 8A.1	Steam Release Data Sheet (Energy Balance)	G	02-14-95
TSC 8A.2	Steam Release Calculation Sheet (Energy Balance)	F	02-14-95
TSC 8A.3	Steam Release Data/Calculation Sheet (Open Valve)	D	02-14-95
TSC 8A.4	Steam Release Data/Calculation Sheet (STMRLS Program)	C	04-16-96
TSC 9A.1	Core Damage Based on Reactor Vessel Level & Fuel Rod Temp.	C	02-14-95
TSC 9A.2	Core Damage Based on Radiation Monitors	C	02-14-95
TSC 9A.3	Cs-134 and Cs-137 PCF Determination	D	04-16-96
TSC 9A.4	Core Damage Based on Activity Ratios	C	02-14-95
TSC 9A.5	Core Damage Assessment (Monitoring Data)	D	04-16-96
TSC 9A.6	Core Damage Summary	C	02-14-95

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>		No.	EPIP-AD-07	Rev.	AK		
		Title	Initial Emergency Notifications				
		Date	FEB 01 2000	Page 1 of 8			
Reviewed By		<i>Walter M. Butts</i>		Approved By		<i>David R. Seebart</i>	
Nuclear Safety Related	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PORC Review Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SRO Approval Of Temporary Changes Required	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

1.0 Purpose

- 1.1 This procedure provides instruction for the 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 Supervisor (SS), 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.

3.0 Precautions and Limitations

- 3.1 "Event Notice," EPIP Form AD 7.1 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," EPIP Form AD 7.1. Notification of the Emergency Response Organization (ERO) (Step 5.6) is not required in this circumstance.
- 3.4 IF an emergency class escalation, de-escalation, change in PAR, termination, or entry into recovery occurs during the notification AND prior to transfer of off-site notifications to the TSC or EOF, disregard any remaining steps and return to Step 5.1 Begin the appropriate actions and notifications for the new emergency level.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-07	Rev. AK
	Title Initial Emergency Notifications	
	Date FEB 01 2000	Page 2 of 8

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 ED/ERM.

5.0 Procedure

- 5.1 IF the State EOC is activated, **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," EPIP Form AD 7.1, received from the ED/ERM has their approval signature, date, and time.
- Note**
Either Warning Center I or Warning Center II may respond. Both are not required to respond.
- 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).
- 5.2.6 WHEN each party acknowledges:
- a. Answer by stating: "**This is the Kewaunee Nuclear Plant - Please stay on the line for a Nuclear Accident Reporting System (NARS) message.**"
- b. Check them off on the "Event Notice," EPIP Form AD 7.1 (upper left hand corner).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-07	Rev. AK
	Title Initial Emergency Notifications	
	Date FEB 01 2000	Page 3 of 8

- 5.2.7 IF after five (5) rings, a party has not answered:
- a. Press the individuals Dial Select number from the table below.
 - b. WAIT up to five (5) more rings, THEN press the “#” key to cancel ringing.

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

- 5.2.8 IF unable to contact a specific agency, THEN continue with the notification of agencies on the line.
- 5.2.9 **Using number and letter designations** (Ref: “Phonetic Alphabet,” EPIP-APPX-A-1, Attachment 1-1.1), read aloud, **SLOWLY AND DELIBERATELY**, the message text (from “Message Start” to “Message End”) of the “Event Notice,” EPIP Form AD 7.1.
- 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**, “Event Notice Verification Call Back.”
- 5.3 Event Notification (Using Secondary Method, Commercial Phone)

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

- 5.3.1 UNLESS an agency is already notified using Dial Select, dial the agency numbers in the order shown above.
- 5.3.2 WHEN the party answers, **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,” EPIP Form AD 7.1.
- 5.3.3 UNTIL all agencies have been notified, repeat Steps 5.3.1 and 5.3.2.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-AD-07	Rev.	AK
	Title	Initial Emergency Notifications		
	Date	FEB 01 2000	Page 4 of 8	

5.4 Event Notice Verification Call Backs

- 5.4.1 Verify the bell switch for the Government verification phone at your station is "ON."
- 5.4.2 Enter the current time in Step 11 of EPIP Form AD 7.1.
- 5.4.3 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 EPIP Form AD 7.1, 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," EPIP Form AD 7.1 (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 SS/ED/ERM or his designee.
- 5.4.4 WHILE monitoring for call backs, proceed with Step 5.5.
- 5.4.5 WHEN call backs are complete, return EPIP Form AD 7.1 to the ED/ERM who approved the Event Notice.

5.5 Notification of the ERO

Note

IF access to Meridian Mail is delayed or problems are encountered when implementing procedure Step 5.5.1, THEN proceed with the pager activations (Step 5.5.2) and return to Step 5.5.1 as time permits.

- 5.5.1 Record message on Meridian Mail.

Note

Review Steps (a) through (o) and fill in the information in Step (g) before picking up telephone receiver.

Note

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

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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-07	Rev. AK
	Title Initial Emergency Notifications	
	Date FEB 01 2000	Page 5 of 8

- b. IF the PBX phone system is inoperable, THEN:
- Dial "1-920-498-5213" from any Kewaunee (388-xxxx) or other non-Green Bay external telephone company exchange line, OR
 - Dial "498-5213" from any Green Bay (433-xxxx, 498-xxxx, etc.) external telephone company exchange, OR
 - Dial "9-1-920-498-5213" from a Centrex (431-xxxx) exchange located in the EOF.
- c. WHEN Meridian Mail answers, Dial "1580#115800#."
- d. WHEN acknowledged, Dial "82" (Greeting Maintenance).
- e. WHEN acknowledged, Dial "3" (Temporary Greeting).
- f. WHEN acknowledged, Dial "5" (Record External Greeting).

Note

The information to complete the following greeting can be found on "Event Notice," EPIP Form AD 7.1.

- g. 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."
- h. Dial "#" (Stop Recording).
- i. Dial "2" (Review Greeting).
- j. IF greeting is not the same as recorded in Step 5.5.1.g, THEN return to Step 5.5.1.d.
- k. IF greeting is correct, THEN Dial "9" (expiration date and time).
- l. Press "#" (default expiration month).
- m. Press the number of tomorrows date and # (expiration day) (example, if today is October 4, then enter "5#").
- n. Press "0400#" (expiration time).
- o. Press "83" (logoff) then hang up.

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-07	Rev. AK
	Title Initial Emergency Notifications	
	Date FEB 01 2000	Page 6 of 8

5.5.2 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 5.5.1.b through 5.5.1.g for the pager codes 9211 and 9222.

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

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-07	Rev. AK
	Title Initial Emergency Notifications	
	Date FEB 01 2000	Page 7 of 8

- 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 5.5.2.b.

5.6 Point Beach Nuclear Plant Notification

- 5.6.1 Call the Point Beach Duty Shift Supervisor at (920) 755-6247.
- 5.6.2 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," EPIP Form AD 7.1.

5.7 Institute of Nuclear Power Operations (INPO) Notification

- 5.7.1 Call the INPO Duty Officer at (800) 321-0614.
- 5.7.2 WHEN the party answers, read aloud the message text (from "Message Start" to "Message End") of the "Event Notice," EPIP Form AD 7.1.
- 5.7.3 Return to EPIP-AD-03, EPIP-AD-04, or EPIP-EOF-04 at the step you left that procedure.

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 EPIP-APPX-A-2, Response Personnel Call List
- 7.4 EPIP-APPX-A-3, Off-Site, On-Site, and Company Support Telephone Numbers
- 7.5 EPIP-AD-03, KNPP Response to an Unusual Event
- 7.6 EPIP-AD-04, KNPP Response to Alert or Higher
- 7.7 EPIP-EOF-04, Corporate Action for Alert or Higher
- 7.8 EPIP Form AD 7.1, Event Notice (Wisconsin Nuclear Accident Reporting Form)

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-AD-07	Rev. AK
	Title Initial Emergency Notifications	
	Date FEB 01 2000	Page 8 of 8

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), EPIP Form AD 7.1

8.1.2 Non-QA Records

None

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-RET-03	Rev. 0
	Title Chemistry Emergency Team	
	Date FEB 01 2000	Page 1 of 3
Reviewed By <i>Wally Hunt</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 defining the responsibilities and requirements of the Chemistry Emergency Team.

2.0 General Notes

- 2.1 None

3.0 Precautions and Limitations

- 3.1 None

4.0 Initial Conditions

- 4.1 This procedure shall be implemented during an **Alert, Site Emergency, General Emergency**, or if requested by the Radiological Protection Director (RPD) or the Emergency Director (ED).

5.0 Procedure

5.1 Responsibilities

- 5.1.1 The **Chemistry Emergency Team** is responsible for performing the chemical analysis necessary for the determination of shutdown margin, extent of liquid effluent releases, extent of core damage, and conditions in the various building sumps and other liquid waste collection points.
- 5.1.2 In the event of a chemical spill, the **Chemistry Emergency Team** is responsible for assessment, control, and clean-up.
- 5.1.3 The **Chemistry Emergency Team** is also responsible for all operation of the Containment Air Sample Panel and Containment Hydrogen Analyzer.
- 5.1.4 Any analyses where expected dose to the team member is greater than 10 CFR 20 limits must be authorized by an Emergency Radiation Work Permit (See EPIP-AD-11).

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No. EPIP-RET-03	Rev. 0
	Title Chemistry Emergency Team	
	Date FEB 01 2000	Page 2 of 3

5.2 Requirements

5.2.1 The following initial actions shall be taken upon activation of the Chemistry Emergency Team.

5.2.1.1 If off-site, report to the plant in accordance with EPIP-AD-03 or EPIP-AD-04.

5.2.1.2 Report to the Radiation Protection Office (or Radiological Analysis Facility) and contact the RPD for information on what chemistry samples are required.

5.2.1.3 Request habitability assessment from HP for the High Rad Sample Room, Hot Chem Lab, and Cold Chem Lab.

5.2.2 The Chemistry Emergency Team shall follow the priorities listed below unless amended by the RPD or ED.

5.2.2.1 Measure Reactor Coolant System boron concentration.

5.2.2.2 Analyze steam generator samples to determine primary-secondary leakage and release to the environment.

5.2.2.3 Analyze containment air for assessment of radiological hazards and hydrogen concentration.

5.2.2.4 Characterize liquid effluent release paths.

5.2.2.5 Analyze reactor coolant for assessment of core damage.

5.2.2.6 Analyze various building sumps for assessment of radiological hazards.

5.2.2.7 Assist in analysis of environmental samples.

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

6.0 Final Conditions

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

7.0 References

7.1 EPIP-AD-05, Emergency Response Organization Shift Relief Guideline

7.2 EPIP-AD-11, Emergency Radiation Controls

WISCONSIN PUBLIC SERVICE CORP. Kewaunee Nuclear Power Plant <i>Emergency Plan Implementing Procedure</i>	No.	EPIP-RET-03	Rev.	0
	Title	Chemistry Emergency Team		
	Date	FEB 01 2000	Page	3 of 3

7.3 Implementing Procedures

- 7.3.1 EPIP-RET-03A, Liquid Effluent Release Paths
- 7.3.2 EPIP-RET-03C, Post-Accident Operation of the High Radiation Sample Room
- 7.3.3 EPIP-RET-03D, Containment Air Sampling Analysis Using CASP

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

ROLL-CALL _____ CHECK _____
 State Warning Center I or II _____
 Kewaunee Co. Sheriff _____
 Manitowoc Co. Sheriff _____

EVENT NOTICE
 (Wisconsin Nuclear Accident Reporting Form)
EPIP FORM AD 7.1

EPIP FORM AD 7.1
 Rev. P
FEB 01 2000
 Page 1 of 1

"MESSAGE START"

"THIS IS [an ACTUAL EVENT / a DRILL] (Circle One)."

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

1. <u>STATUS</u> (Use both A&D to Declare & Terminate at the same time) <input type="radio"/> A Actual <input type="radio"/> B Exercise <input type="radio"/> C Drill <input type="radio"/> D Termination	2. <u>STATION/PLANT</u> <input type="radio"/> (S) Kewaunee	3. <u>ON-SITE ACCIDENT CLASSIFICATION</u> <input type="radio"/> (A) Unusual Event <input type="radio"/> (B) Alert <input type="radio"/> (C) Site Area Emergency <input type="radio"/> (D) General Emergency <input type="radio"/> (E) Recovery <input type="radio"/> (F) Not Applicable
---	---	---

4. <u>ACCIDENT</u> CLASSIFIED _____ TERMINATED _____ TIME: _____ TIME: _____ DATE: _____ DATE: _____ EAL Chart: _____	5. <u>RELEASE TO ENVIRONMENT</u> <input type="radio"/> (A) None <input type="radio"/> (B) Potential <input type="radio"/> (C) Occurring <input type="radio"/> (D) Terminated	6. <u>TYPE OF RELEASE</u> <input type="radio"/> (A) Not Applicable <input type="radio"/> (B) Radioactive Gas <input type="radio"/> (C) Radioactive Liquid
---	--	--

7. <u>WIND DIRECTION</u> FROM _____ (degrees) . Downwind Sector _____ (one)	8. <u>WIND SPEED</u> <input type="radio"/> (B) Miles / HR _____
---	--

9. <u>RECOMMENDED ACTIONS</u> <input type="radio"/> (A) NONE <table style="width: 100%;"> <tr> <td style="width: 50%;"><u>EVACUATE</u></td> <td style="width: 50%;"><u>SECTORS</u></td> </tr> <tr> <td><input type="radio"/> (B)</td> <td>0-2 mile radius</td> </tr> <tr> <td><input type="radio"/> (C)</td> <td>0-5 mile radius</td> </tr> <tr> <td><input type="radio"/> (D)</td> <td>2-5 miles for sectors _____</td> </tr> <tr> <td><input type="radio"/> (E)</td> <td>5-10 miles for sectors _____</td> </tr> <tr> <td><input type="radio"/> (F) Other _____</td> <td></td> </tr> </table>	<u>EVACUATE</u>	<u>SECTORS</u>	<input type="radio"/> (B)	0-2 mile radius	<input type="radio"/> (C)	0-5 mile radius	<input type="radio"/> (D)	2-5 miles for sectors _____	<input type="radio"/> (E)	5-10 miles for sectors _____	<input type="radio"/> (F) Other _____		10. <u>OTHER SIGNIFICANT INFORMATION</u> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<u>EVACUATE</u>	<u>SECTORS</u>												
<input type="radio"/> (B)	0-2 mile radius												
<input type="radio"/> (C)	0-5 mile radius												
<input type="radio"/> (D)	2-5 miles for sectors _____												
<input type="radio"/> (E)	5-10 miles for sectors _____												
<input type="radio"/> (F) Other _____													

11. This message is being transmitted by _____ (name) at the Kewaunee Nuclear Power Plant.
 The return phone number is (920) 388-0101. Message transmission was complete at _____ (Time).

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

"MESSAGE END"

Signature _____ DATE / TIME APPROVED _____ / _____
 Approved Prior to Release by ED / ERM (Circle One)

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

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

Completion Instructions

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

Roll-Call

Area - Provides a quick check-off when off-site dispatchers pickup for a notification call.

Box "Message Start" - The words "an Actual Event" OR "a Drill" should be clearly circled. This is the opening statement to be made by the Notifier or Communicator when all off-site recipients are available on the line.

Box #1 - Blacken or check the appropriate circle. This box denotes whether the event is a real event, a simulated event, or the termination of an event. For actual events, both A & D may be checked if the event is terminated prior to declaration and notification. In this case, 2 times and dates must be included in box #4.

Box #2 - Only one option here for us. The State form has all other plants listed.

Box #3 - Blacken or check the appropriate circle for the appropriate event that is being communicated.

Box #4 - This is a Two-Part box. Each part must be completed with the time and date the event level was positively identified. The "EAL Chart" letter will aid the State technical people review our classification criteria. Each part may be used separately or together if an event has a short duration such that the EAL parameter is exceeded and immediately removed. Therefore, the event may be initiated and terminated all in the same event notice. In this case, both A & D should be checked in box #1.

Box #5 - Blacken or check the appropriate circle based on the information available at the time. This box provides a quick status of the radiological release impact of the event being experienced.

Box #6 - Blacken or check the appropriate circle based on what is known about the type of radiological release that is in progress, has the potential to occur, or has terminated.

Box #7 - Write in the 10-meter wind direction directly off of the plant monitors. Determine the "ONE" downwind sector to which the wind direction instrument reading is pushing the plume. Choose the sector letter that falls between the instrument wind direction in degrees below.

11	33.5	56	78.5	101	123.5	146	168.5	191	213.5	236	258.5	281	303.5	326	348.5	11
K	L	M	N	P	Q	R	A	B	C	D	E	F	G	H	J	

Box #8 - Blacken or check the circle and write in the 10-meter wind speed.

Area #9 - Blacken or check the circle as directed by procedure EPIP-AD-19. For events less than a General Emergency, only circle "A" should be checked. For items "D" or "E," the three downwind sectors affected should be put here. The three sectors include the sector of the center line wind direction (see box #7) and the sector on either side. Item "F" provides space for any other recommendation we may have based on known plant or local area conditions.

Area #10 - This space should be completed with a "BRIEF" statement on the nature of the event. The EAL Chart title from box #4 may be adequate. Avoid the use of acronyms.

Area #11 - The person transmitting this information should write in their name and read the statement. After the read back by the State, enter the time message transmission was completed.

Box "Message End" - This is the closing statement and the point at which we request the State to "Repeat Back" the information transmitted. This provides a second check by all parties to ensure accuracy.

Approval - Notifiers and Communicators "MUST NOT" transmit any event notice "UNLESS" an ED or ERM has signed, dated, and timed the approval of the information.

Verification Call Backs - Record the "name" of the state or county official and the "time" at which that official calls back to verify the emergency declaration is valid. After the State and county dispatchers hang up, they will contact their respective duty officers. These duty officers will then call back to the plant using the "Government Verification Phone" line to verify the declaration and possibly ask for more information.