Change Notice 02-008

	DELETED:		TRANSMITTED:	
	Number	<u>Date</u>	Number	<u>Date</u>
1.	IMC 0102	06/29/99	IMC 0102	03/06/02
2.	IMC 0609, App C	04/21/00	IMC 0609, App C	03/06/02
3.	IMC 0609, App D	12/29/00	IMC 0609, App C	03/06/02
4.	IP 71121	04/03/00	IP 71121	03/06/02
5.	IP 71121.01	04/03/00	IP 71121.01	03/06/02
6.	IP 71121.02	04/03/00	IP 71121.02	03/06/02
7.	IP 71121.03	04/03/00	IP 71121.03	03/06/02
8.	IP 71122.01	04/03/00	IP 71122.01	03/06/02
9.	IP 71122.02	04/03/00	IP 71122.02	03/06/02
10.	IP 71122.03	04/03/00	IP 71122.03	03/06/02

TRAINING: No special training requirements have been identified for any documents issued with this change notice.

REMARKS: IMC 0102 (Oversight and Objectivity of Inspectors and Examiners at Reactor Facilities) has been revised to consolidate requirements for observing licensing examiners from other operator licensing documents into this manual chapter. The requirement to document supervisory review of employees to specifically include the performance attributes listed in the manual chapter has been expanded. The requirement for quarterly phone calls to senior resident inspectors has been deleted. Also other minor revisions to conform with the Reactor Oversight Process and to clarify language have been included.

> IMC 0609, Appendix C (Occupational Radiation Safety) has been revised to incorporate changes gained since its implementation and feedback from a series of public meetings with NEI staff and other stakeholders. Major revisions included:

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- 1. The three-year rolling average collective dose criteria were moved from the screening questions in IMC 0612 (formerly 0610*) to IMC 0609.
- 2. The >50% and 5 person-rem criteria were moved from the screening questions in IMC 0612 (formerly 0610*) and are addressed in the text to provide guidance in determining if an ALARA issue is "more than minor."
- 3. Definitions of "unplanned, unintended collective dose" and "work activity" are provided.
- 4. The "greater than 2 occurrences in 18 months" criteria has been revised to "greater than 4 occurrences within a calendar year."

IMC 0609, Appendix D (Public Radiation Safety) has been revised to incorporate feedback from the regional inspectors based on its implementation. These include:

- 1. Additional guidance to clarify that the inspection period for the assessment of findings is for two years, based on eight rolling calendar quarters.
- 2. Additional guidance which added a quantitative dose value to determine when it is appropriate to use the SDP for risk assessment of a finding which involved a discrete radioactive particle.
- 3. Additional guidance to clarify the types of radioactive material covered by the SDP.
- 4. The narrative discussion was revised to agree with the headings in the SDP flowcharts.
- 5. Clarifying the handling/processing of DRP exposure occurrences.

IP 71121 Occupational Radiation Safety

<u>IP 71121.01</u> Access to Radiologically Significant Areas

IP 71121.02 ALARA Planning and Controls

<u>IP 71121.03</u> Radiation Monitoring Instrumentation and Protective Equipment

The above attachments to IP 71121 have been revised as follows:

- 1. The Problem Identification and Resolution sections have been revised to make the sections uniform.
- 2. A new inspection requirement and guidance was added to Attachment .01 to determine licensee compliance with 10 CFR Part 20.1101(c).
- 3. Attachment .02 was modified to conform with the changes to the ALARA SDP and Screening Criteria (draft IMC 0612).
- 4. Attachments were revised to focus inspections on periods before, during, and after scheduled outages to give more flexibility and to recognize ongoing Regional practice when planning inspections.
- 5. Reduced the estimated inspection hours for Attachment .02.

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6. Asterisks have been added to a number of inspection requirements in Attachment .02. The inspection requirements identified with asterisks are optional and should be inspected as deemed appropriate by the Regions for plants whose three-year rolling average collective dose is not in the top (lowest dose) quartile.

<u>IP 71122.01</u> (Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems) has been revised to allow the inspector the option to review the "...system surveillance test results or licensee specific methodology to ensure that the system is operating within the licensee's acceptance criteria." This revision adds inspection flexibility for licensees that do not have surveillance requirements for ventilation equipment. Additionally a range of inspection hours was established based on the actual inspection data.

<u>IP 71122.02</u> (Radioactive Material Processing and Transportation) has been revised to add the requirement to review the licensee's audit program to verify that it complies with the requirements of 10 CFR 20.1101(c). The base inspection hours were increased and a range of inspection hours was established based on actual inspection hours during the first year of ROP implementation.

<u>IP 71122.03</u> (Radiological Environmental Monitoring Program (REMP) and Radioactive Material Control Program) was revised to add the requirement to review the licensee's audit program to verify that it complies with the requirements of 10 CFR 20.1101(c). A range of inspection hours was added based on actual inspection data.

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