

Public Radiation Safety SDP draft revision

Draft for Public Comment

Reason for SDP Revision

- Update - last complete revision July 2003
- Incorporate Spills and Leaks

Proposed Changes To:

- Effluent program
- Environmental program
- Radioactive Material Control

Greater than Minor

- Evaluate finding under Inspection Module 0612, Inspection Reports
- Screen for Greater than Minor, using examples - Module 0612, Appendix E
- Screen for Minor Questions, using 0612, Appendix B (e.g., cornerstone attribute)
- Greater Than Minor = Green or greater

SDP

- “Greater Than Minor” findings are evaluated under the SDP
- Automatically becomes a Green or greater finding
- SDP screens for White, Yellow or Red
- If not “White, Yellow, or Red”, then it’s Green

Leaks and Spills

- Effluents not reaching discharge point are leaks
- Define the threshold for leaks and spills
 - An amount of radioactivity equivalent to 100 gallons of 10X Appendix B concentrations
- Green finding - failure to adequately sample and analyze
- White finding for unanalyzed radiological condition (Braidwood)

Routine Effluents

- Green finding
 - Change wording from
 - “impaired ability to assess dose” to
 - “unanalyzed radiological condition”
- White Finding
 - Remove words “impaired ability” AND “failed to assess dose”
 - Same dose consequence level of > App I

Environmental monitoring

- Green –
 - Change “impaired ability” to “adequately sample and analyze in a timely manner”
- White
 - Change from a “required environmental pathway” to
 - Change to “unanalyzed radiological condition of a significant exposure pathway” per RG 1.109 definition (10% of total dose)

Radioactive Material Control

- Delete the 5 occurrence threshold

Conclusions

- Regardless of SDP classification, all performance deficiencies must be corrected
- Even minor findings must be included in corrective action programs, fixed in a timely manner, and are subject to NRC follow-up inspections