

## Proposed Changes to Public Radiation Safety SDP

In summary, the staff proposes 3 types of revisions to SDP for the Public Cornerstone (Appendix D to IMC 0609):

1. Include the three changes approved by the Commission to the SDP for the effluent and environmental programs (based on SECY-07-0112 - see below)
2. In the Rad Material Control Section, remove the decision block for loss of rad material control exceeding 5 occurrences (based on aggregation).
3. In the Low Level Burial Ground (LLBG) branch, remove the LLBG Access Denied decision block ~~based~~ that results in a Yellow finding (based on regulatory compliance and public confidence).

### Implementation Details:

1. SDP effluent and environmental branches (approved by Commission):
  - Include spills and leaks as effluent releases.
  - Replace the decision block for impaired ability to assess dose a decision block for a substantial failure to implement the radiological effluent release program)
  - Remove the White finding from the radioactive environmental monitoring program branch (since there is very low risk in performance deficiencies in the environmental monitoring program). Note: Braidwood would be a White Finding based from the effluents branch for substantial failure to implement the effluent release program.
  - JUSTIFICATION: See SECY 07-0112

## 2. SDP radioactive material control branch:

- Remove the decision block for more than five radioactive material control deficiencies (aggregation) leading to a white finding
- JUSTIFICATION: At the time the SDP was developed, staff determined that if a licensee had more than five deficiencies in two years, there would be a loss of public confidence and the White finding would be justified. The risk to the public from aggregating the findings in this area does not rise to the level of low to moderate safety significance and therefore does not justify a White finding.

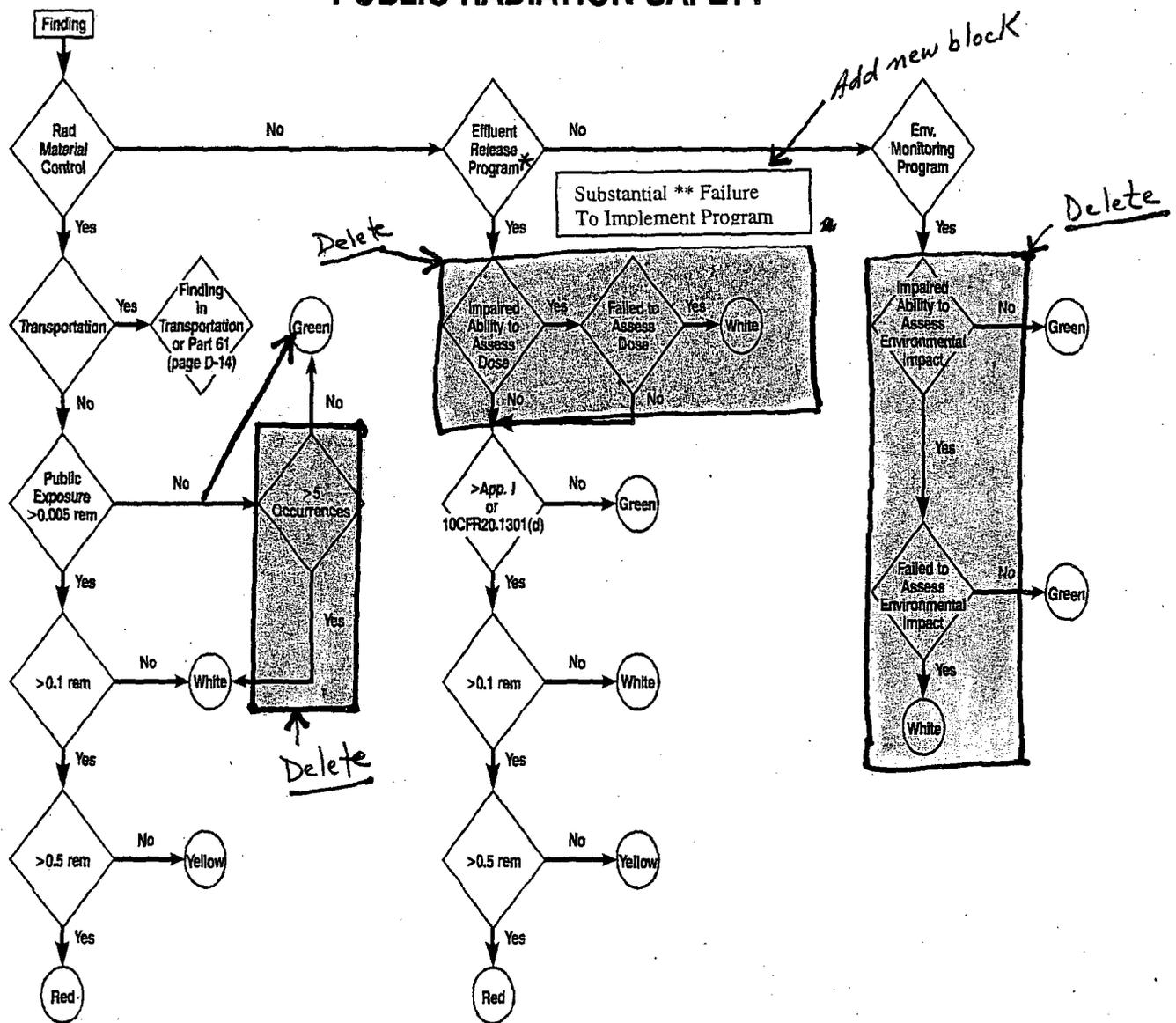
## 3. SDP transportation branch

- Remove the decision block in the Low Level Burial Ground branch that results in a Yellow finding if a licensee is denied access to a burial ground for greater than 30 days. Keep the other decision blocks with performance deficiencies.
- JUSTIFICATION: At the time the SDP was developed, it was determined that suspension of access for regulatory compliance purposes would be a failure to meet regulatory requirements. Although not documented as such, it was also identified as a public confidence concern if a licensee was denied access to a burial ground. At the time, staff also felt that being denied access would be the result of a number of separate incidences (aggregation) which would indicate that the licensee has a program deficiency.

Denial of access to a burial facility is not a performance deficiency with substantial safety significance (Yellow Finding), and is not consistent with NRC's effort of risk informing the SDP. Performance deficiencies for transportation issues are captured in existing decision blocks.

# Proposed Changes

## PUBLIC RADIATION SAFETY

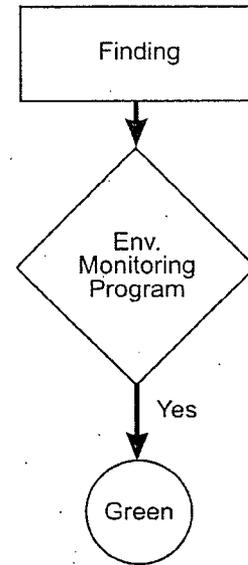
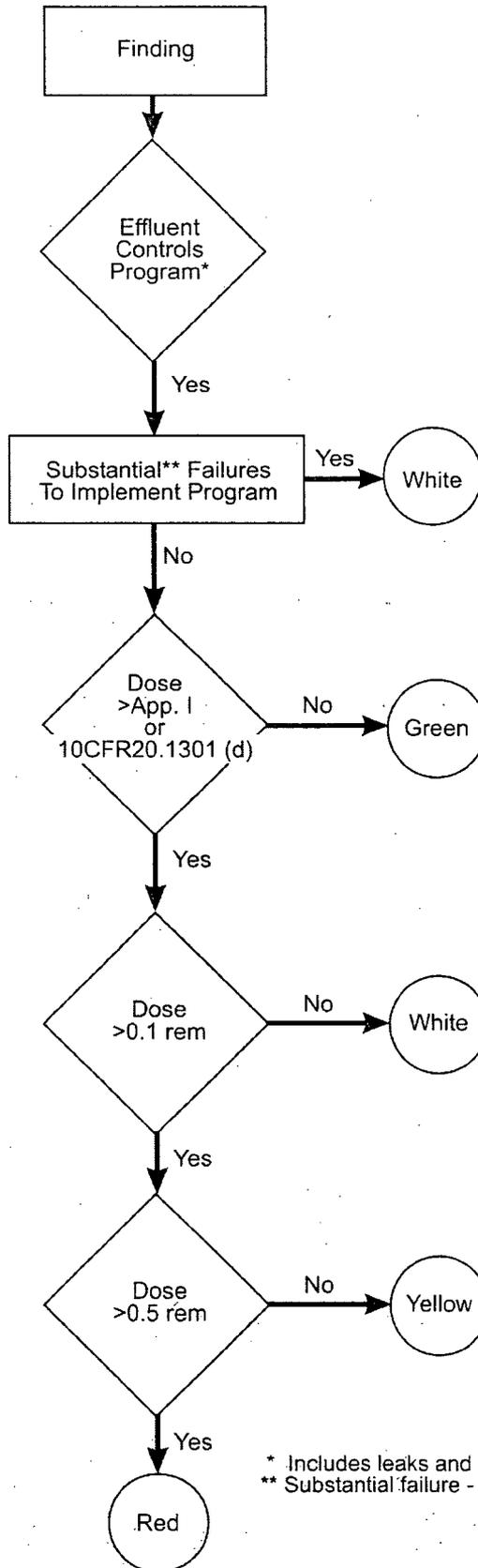
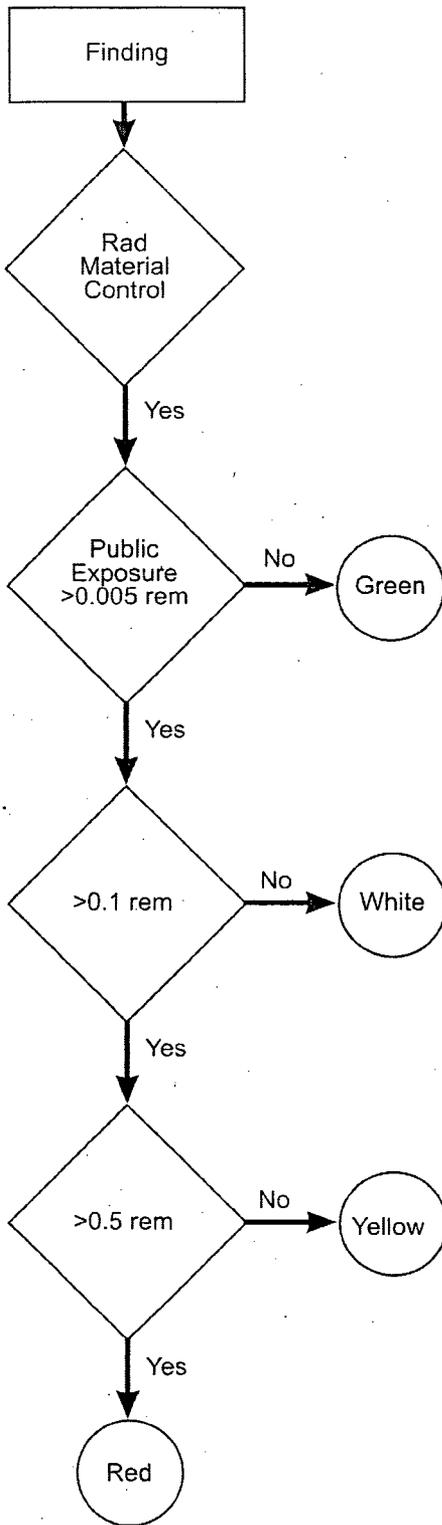


\* Includes leaks and spills

\*\* A significant deficiency in licensee performance, warranting additional inspection to independently verify licensee corrective action.

# Revised Flow Chart

## PUBLIC RADIATION SAFETY

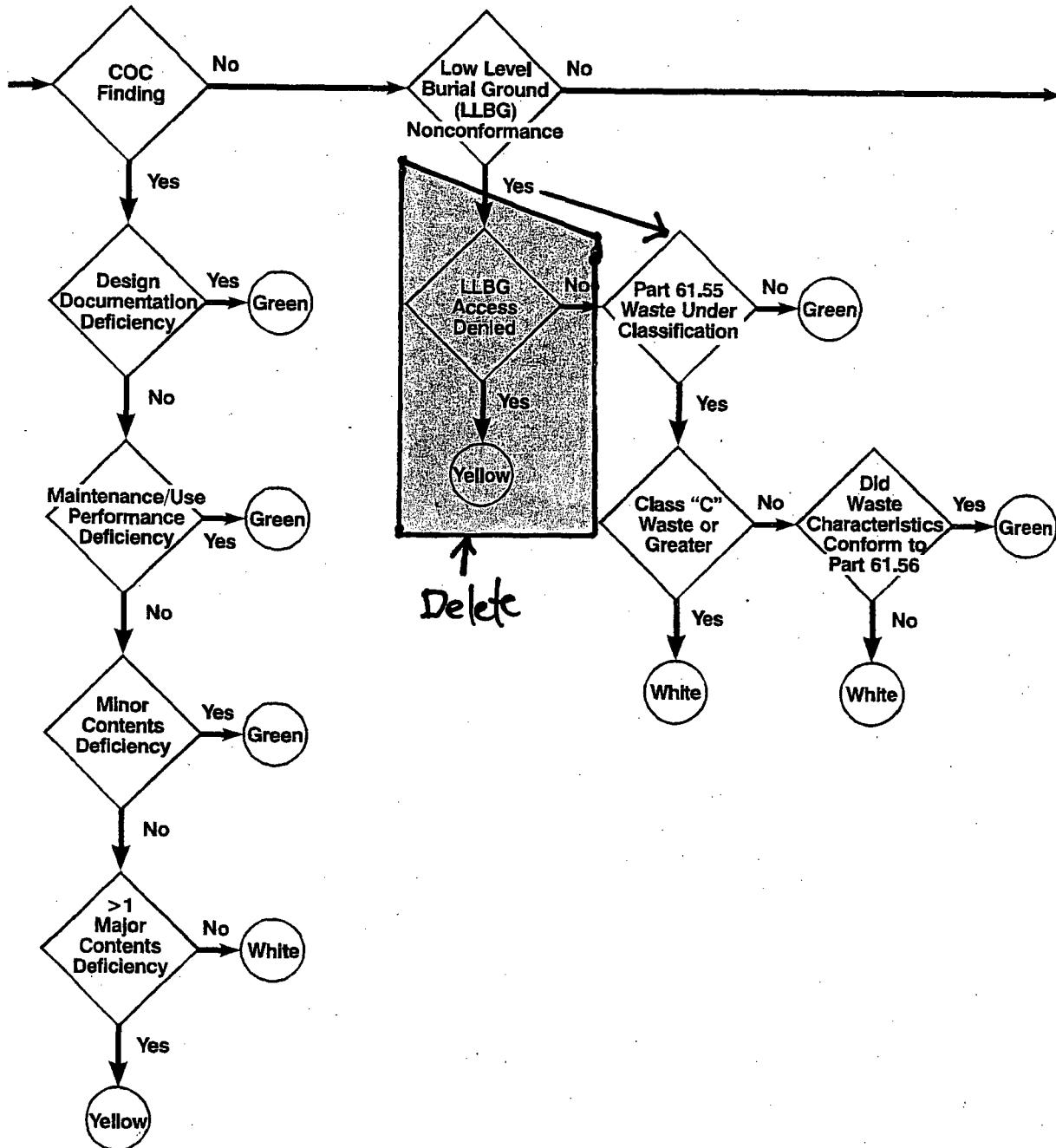


\* Includes leaks and spills  
 \*\* Substantial failure - significant deficiency in licensee performance, warranting additional inspection to independently verify licensee corrective action.

# Transportation SDP – Proposed Changes

## Certificate of Compliance

## Low Level Burial Ground



# Transportation SDP – Revised

## Certificate of Compliance

## Low Level Burial Ground

