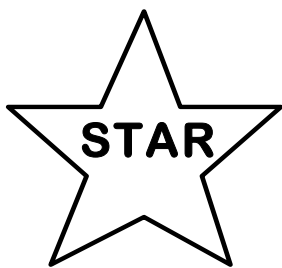


PILGRIM NUCLEAR POWER STATION

Procedure No. 6.1-215

OFF-SITE ACTIVITIES PERFORMED UNDER JURISDICTION
OF BY-PRODUCT MATERIAL LICENSE



Stop
Think
Act
Review

CONTINUOUS USE

REVISION LOG

REVISION 9

Date Originated 11/07

Pages Affected

Description

(Revision 8 omitted due to MERLIN revision numbering scheme.)

4-8

Replace retired PNPS Procedure references with Entergy (EN) Procedure references.

6

Replace Regulatory and Industry Affairs with Licensing.

6

Replace MSTP with PM database.

REVISION 7

Date Originated 5/04

Pages Affected

Description

4,5,7

Replace retired PNPS 6.1-025 with superseding ENN-RP-108.

REVISION 6

Date Originated 2/03

Pages Affected

Description

4,5,7

Incorporate PNPS 6.6-010 into process.

4-8

Correct NRC and MDPH licenses numbers.

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1.0 PURPOSE AND SCOPE

This Procedure defines the requirements for activities performed under the jurisdiction of the By-product Material License.

2.0 REFERENCES

2.1 DEVELOPMENTAL

- [1] OERP Action Item 59001501

2.2 IMPLEMENTING

- [1] 10CFR71, "Packaging and Transportation of Radioactive Material"
- [2] 105CMR120.000, "The Massachusetts Regulations of the Control of Radiation"
- [3] ANSI/ANS 3.1-1978, Standard for Selection and Training of Nuclear Power Plant Personnel
- [4] By-product Material License Numbers 20-07626-04 and 07-6262: PNPS NRC By-product Material License and Commonwealth of Massachusetts Department of Public Health By-product Materials License
- [5] NRC Information Notice No. 90-15, Reciprocity: Notification of Agreement State Radiation Control Director(s) Before Beginning Work in Agreement State(s).
- [6] Procedures
 - (a) EN-RP-105, *"Radiation Work Permits"*
 - (b) EN-RP-106, *"Radiological Survey Documentation"*
 - (c) EN-RP-108, *"Radiation Protection Posting"*
 - (d) EN-RP-121, *"Radioactive Material Control"*
 - (e) EN-RP-143, *"Source Control"*
 - (f) EN-RP-202, *"Personnel Monitoring"*
 - (g) EN-RW-102, *"Radioactive Shipping Procedure"*

3.0 DEFINITIONS

None

4.0 DISCUSSION

It is sometimes necessary to perform special inspection, repair, and/or testing on the Reactor or other system components at temporary field locations (vendor facilities) outside the boundaries of Pilgrim Nuclear Power Station (PNPS). PNPS By-product Material License provides the mechanism by which these activities may be conducted, including shipping the components to an off-site facility and back to PNPS.

5.0 SPECIAL TOOLS AND EQUIPMENT

- [1] A current copy of EN-RP-105, EN-RP-106, EN-RP-108, EN-RP-121, EN-RP-143, EN-RP-202, EN-RW-102, and By-product Material License Numbers 20-07626-04 and 07-6262.
- [2] A list of phone numbers of the individuals to be contacted for assistance.
- [3] Qualified personnel with adequate equipment to complete the task covered by By-product Material License Numbers 20-07626-04 and 07-6262.

6.0 PRECAUTIONS AND LIMITATIONS

- [1] Ensure the total corrosion product activity is less than 3 curies total and 30 or less millicuries per nuclide for components shipped off-site.
- [2] A Radiation Work Permit (RWP) must be issued prior to commencing activities under the By-product Material License in accordance with EN-RP-105, EN-RP-106, EN-RP-108, EN-RP-121, EN-RP-143, EN-RP-202, EN-RW-102, and By-product Material License Numbers 20-07626-04 and 07-6262.
- [3] Agreement State Radiation Control Directors must be notified prior to performing work in Agreement States in accordance with NRC Information Notice 90-15.
[OERP action item #59001501]

- [4] All vendor company employees assigned to work on the radioactive equipment under PNPS control shall receive radiation protection orientation to a degree commensurate with the level of hazard associated with the work. The orientation shall cover those radiation protection procedures and practices necessary to allow the employee to perform his/her assignment without incurring unnecessary radiation exposure.
- [5] Prior to beginning work at the vendor's facility, an RP Technician shall ensure that the job about to be done can be accomplished in a radiologically safe manner and that proper controls can be established.
- [6] A random direct frisk of the work area shall be performed to establish a baseline in case some radioactive material is present due to previous radiological work in the area for a different customer.

7.0 PREREQUISITES

None

8.0 PROCEDURE

- [1] The Radiation Protection Officer (RPO), as specified in name in the By-product Material License, shall assume overall responsibility for activities conducted under By-product Material License Numbers 20-07626-04 and 07-6262.
- [2] If work is to be performed in an Agreement State (request Licensing Manager to determine whether the state is an Agreement State), Licensing will coordinate a request to the State Radiation Control Director to allow work under PNPS By-product Material License.
- [3] An annual self-assessment audit of this Procedure shall be performed by Radiation Protection personnel. This requirement will be tracked using the PM database in accordance with 10CFR20.1101 and 10CFR20.2102.
- [4] Components shall be packaged and transported to the vendor facility in accordance with EN-RW-102.
- [5] An individual who is qualified to ANSI/ANS 3.1-1978 (ANSI-RP Technician) and has been qualified by Training shall be present at the vendor's facility prior to the unloading of components.
- [6] The RP Technician shall ensure a Radiological Control Area (RCA) is properly established at the vendor's facility.

- [7] An RP Technician shall be present at the vendor's facility while work on the components is in progress and shall be directly responsible for proper radiological control.
- [8] The RP Technician shall have access to the following while at the vendor's facility:
- (a) A current copy of EN-RP-105, EN-RP-106, EN-RP-108, EN-RP-121, EN-RP-143, EN-RP-202, EN-RW-102, and By-product Material License Numbers 20-07626-04 and 07-6262.
 - (b) A list of phone numbers of individuals who should be contacted for assistance.
- [9] During periods when work in the RCA is not in progress, all of the radioactive material shall be stored in a locked area with the keys in the possession of the RP Technician, or under constant surveillance by a PNPS employee.

CAUTION

RP Technician shall evaluate all ventilation paths and establish proper monitoring for exhaust systems such as epoxy heating ovens, etc.

- [10] Prior to beginning work on the components, the RP Technician shall give consideration to the following to control the spread of radioactive contamination:
- (a) Cover uninvolved equipment inside the RCA.
 - (b) Contain the work inside a ventilated "tent".
 - (c) Cover floors, benches, etc.
- [11] The RP Technician shall perform the types of surveys on the frequency given on the RWP as a minimum.
- [12] Protective clothing requirements shall be specified on the RWP. (Protective clothing shall be furnished by PNPS.)
- [13] Dosimetry requirements shall be specified on the RWP.
- [14] Temporary shielding shall be considered and the ALARA work group notified, if applicable.
- [15] When activities are completed at the vendor's facility, all components and any radioactive waste generated shall be properly packaged and transported back to PNPS in accordance with EN-RP-121 and EN-RW-102.

- [16] After removal of radioactive materials, the RCA will be unconditionally released upon verification that areas meet the criteria in EN-RP-121, *"Radioactive Material Control"*.
- (a) If the above limits cannot be achieved, appropriate decontamination shall be performed until the limits are met.
 - (b) After the above limits are met, radiological posting shall be removed.
- [17] Records of activities conducted at the vendor's facility under By-product Material License Number 20-07626-04 or 07-6262, as appropriate, shall be maintained in one package. They shall include:
- (a) Records showing the transfer of radioactive materials to and from vendor's facilities.
 - (b) Records of radiological surveys.
 - (c) Records of personnel exposures.
- [18] A report of individual's radiation exposures shall be furnished to the vendor company following the completion of activities.

9.0 ACCEPTANCE CRITERIA

The offsite activities performed under jurisdiction of By-product Material License Numbers 20-07626-04 and 07-6262 were performed as written in this Procedure without unexplained discrepancies and originals of reports and records generated have been transmitted to file.

10.0 ATTACHMENTS

None