



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

March 5, 2009

Randall K. Edington  
Executive Vice President, Nuclear  
and Chief Nuclear Officer  
Mail Station 7602  
Arizona Public Service Company  
P. O. Box 52034  
Phoenix, AZ 85072-2034

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION - NRC RADIATION SAFETY  
TEAM INSPECTION 05000528/2009007, 05000529/2009007, AND  
05000530/2009007

Dear Mr. Edington:

On January 30, 2009, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Palo Verde Nuclear Generating Station. The enclosed Radiation Safety Team inspection report documents the inspection findings which were discussed with Mr. R. Bement, Vice President, Nuclear Operations, and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license.

The team reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, the team evaluated the inspection areas within the Radiation Protection Strategic Performance Area that are scheduled for review every two years. These areas are:

- Radiation Monitoring Instrumentation
- Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems
- Radioactive Material Processing and Transportation
- Radiological Environmental Monitoring Program and Radioactive Material Control Program

On the basis of the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component

of NRC's document system (ADAMS). ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Gregory E. Werner, Chief  
Plant Support Branch 2  
Division of Reactor Safety

Docket Nos. 50-528, 50-529, 50-530  
License Nos. NPF-41, NPF-51, NPF-74

Enclosure: NRC Inspection Report 05000528/2009007,  
05000529/2009007, and 05000530/2009007

cc w/enclosure:

Mr. Steve Olea  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

Mr. Douglas Kent Porter  
Senior Counsel  
Southern California Edison Company  
Law Department, Generation Resources  
P.O. Box 800  
Rosemead, CA 91770

Chairman  
Maricopa County Board of Supervisors  
301 W. Jefferson, 10th Floor  
Phoenix, AZ 85003

Mr. Aubrey V. Godwin, Director  
Arizona Radiation Regulatory Agency  
4814 South 40 Street  
Phoenix, AZ 85040

Mr. Scott Bauer, Director  
Regulatory Affairs  
Palo Verde Nuclear Generating Station  
Mail Station 7636  
P.O. Box 52034  
Phoenix, AZ 85072-2034

Mr. Dwight C. Mims  
Vice President  
Regulatory Affairs and Plant Improvement  
Palo Verde Nuclear Generating Station  
Mail Station 7605  
P.O. Box 52034  
Phoenix, AZ 85072-2034

Mr. Jeffrey T. Weikert  
Assistant General Counsel  
El Paso Electric Company  
Mail Location 167  
123 W. Mills  
El Paso, TX 79901

Mr. Eric Tharp  
Los Angeles Department of Water & Power  
Southern California Public Power Authority  
P.O. Box 51111, Room 1255-C  
Los Angeles, CA 90051-0100

Mr. James Ray  
Public Service Company of New Mexico  
2401 Aztec NE, MS Z110  
Albuquerque, NM 87107-4224

Mr. Geoffrey M. Cook  
Southern California Edison Company  
5000 Pacific Coast Hwy. Bldg. D21  
San Clemente, CA 92672

Mr. Robert Henry  
Salt River Project  
6504 East Thomas Road  
Scottsdale, AZ 85251

Mr. Brian Almon  
Public Utility Commission  
William B. Travis Building  
P.O. Box 13326  
Austin, TX 78701-3326

Arizona Public Service Company

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Environmental Program Manager  
City of Phoenix  
Office of Environmental Programs  
200 West Washington Street  
Phoenix, AZ 85003

Mr. John C. Taylor  
Director, Nuclear Generation  
El Paso Electric Company  
340 East Palm Lane, Suite 310  
Phoenix, AZ 85004

Chief, Radiological Emergency Preparedness Section  
FEMA Region 9  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052

## Electronic distribution by RIV:

Regional Administrator (Elmo.Collins@nrc.gov)  
 Deputy Regional Administrator (Chuck.Casto@nrc.gov)  
 DRP Director ([Dwight.Chamberlain@nrc.gov](mailto:Dwight.Chamberlain@nrc.gov))  
 DRP Deputy Director (Anton.Vegel@nrc.gov)  
 DRS Director (Roy.Caniano@nrc.gov)  
 DRS Deputy Director ([Troy.Pruett@nrc.gov](mailto:Troy.Pruett@nrc.gov))  
 Senior Resident Inspector (Ryan.Treadway@nrc.gov)  
 Resident Inspector (Michelle.Catts@nrc.gov)  
 Resident Inspector (Jim.Melfi@nrc.gov)  
 Resident Inspector (Joseph.Bashore@nrc.gov)  
 Branch Chief, DRP/D ([Michael.Hay@nrc.gov](mailto:Michael.Hay@nrc.gov))  
 PV Site Secretary (Patricia.Coleman@nrc.gov)  
 Senior Project Engineer, DRP/D (Don.Allen@nrc.gov)  
 Public Affairs Officer (Victor.Dricks@nrc.gov)  
 Team Leader, DRP/TSS (Chuck.Paulk@nrc.gov)  
 RITS Coordinator (Marisa.Herrera@nrc.gov)  
 DRS STA (Dale.Powers@nrc.gov)  
 OEDO RIV Coordinator, Primary (Shawn.Williams@nrc.gov)  
 OEDO RIV Coordinator, Backup (Eugene.Guthrie@nrc.gov)  
 ROPreports

Sunsi Review Completed:      ADAMS: ☒ ☐      Initials: LCC2  
☒ Publicly Available   ☐ Non-Publicly Available   ☐ Sensitive   ☒ Non-Sensitive

RIV:DRS/PSB2	PSB2	PSB2	PSB2	C:PSB2
LCCarson/dch	LTRicketson	DCGraves	DLStearns	GEWerner
/RA/	/RA/	/RA/	/RA/	/RA/
2/22/09	2/26/09	2/24/09	3/1/09	3/5/09

C:DRP/	C:PSB2			
MHay	GEWerner			
/RA/	/RA/			
3/5/09	3/5/09			

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**U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV**

Dockets: 50-528, 50-529, 50-530

Licenses: NPF-41, NPF-51, NPF-74

Report: 05000528/2009007, 05000529/2009007, 05000530/2009007

Licensee: Arizona Public Service Company

Facility: Palo Verde Nuclear Generating Station, Units 1, 2, and 3

Location: 5951 S. Wintersburg Road  
Tonopah, Arizona

Dates: January 26 - 30, 2009

Inspectors: L. C. Carson II, Senior Health Physicist and Team Leader  
L. T. Ricketson, P.E., Senior Health Physicist  
D. C. Graves, Health Physicist  
D. L. Stearns, Health Physicist

Approved By: Gregory E. Werner, Chief  
Plant Support Branch 2  
Division of Reactor Safety

## SUMMARY OF FINDINGS

IR 05000528/2009007, 05000529/2009007, 05000530/2009007; 01/26/2009 – 01/30/2009;  
Palo Verde Nuclear Generating Station Units 1, 2, and 3; Radiation Safety Team Inspection

The report covered a 5-day period of inspection onsite by a team of four region-based health physics inspectors. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations

None

## Report Details

### 2. RADIATION SAFETY

**Cornerstones: Occupational Radiation Safety [OS] and Public Radiation Safety [PS]**

#### **2OS3 Radiation Monitoring Instrumentation and Protective Equipment (71121.03)**

##### a. Inspection Scope

This area was inspected to determine the accuracy and operability of radiation monitoring instruments that are used for the protection of occupational workers and the adequacy of the program to provide self-contained breathing apparatus (SCBA) to workers. The team used the requirements in 10 CFR Part 20 and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed:

- Calibration of area radiation monitors associated with transient high and very high radiation areas and post-accident monitors used for remote emergency assessment;
- Calibration of portable radiation detection instrumentation, electronic alarming dosimetry, and continuous air monitors used for job coverage;
- Calibration of whole body counting equipment and radiation detection instruments utilized for personnel and material release from the radiologically controlled area;
- Audits and self-assessments; licensee event reports or special reports, if any were required since the previous inspection;
- Corrective action program reports since the last inspection;
- Licensee action in cases of repetitive deficiencies or significant individual deficiencies;
- Calibration expiration and source response check currency on radiation detection instruments staged for use;
- The licensee's capability for refilling and transporting SCBA air bottles to and from the control room and operations support center during emergency conditions, status of SCBA staged and ready for use in the plant and associated surveillance records, and personnel qualification and training;



- Qualification documentation for onsite personnel designated to perform maintenance on the vendor-designated vital components, and the vital component maintenance records for SCBA units;

Either because the conditions did not exist or an event had not occurred, no opportunities were available to review the following items:

- Licensee event reports or special reports

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of nine of the required nine samples, as defined in Inspection Procedure 71121.03-05.

b. Findings

No findings of significance were identified.

**2PS1 Radioactive Gaseous And Liquid Effluent Treatment And Monitoring Systems (71122.01)**

a. Inspection Scope

This area was inspected to: (1) ensure that the gaseous and liquid effluent processing systems are maintained so that radiological discharges are properly mitigated, monitored, and evaluated with respect to public exposure; (2) ensure that abnormal radioactive gaseous or liquid discharges and conditions, when effluent radiation monitors are out-of-service, are controlled in accordance with the applicable regulatory requirements and licensee procedures; (3) verify that the licensee's quality control program ensures that the radioactive effluent sampling and analysis requirements are satisfied so that discharges of radioactive materials are adequately quantified and evaluated; and (4) verify the adequacy of public dose projections resulting from radioactive effluent discharges. The team used the requirements in: 10 CFR Part 20; 10 CFR Part 50, Appendices A and I; 40 CFR Part 190; the Offsite Dose Calculation Manual; and licensee procedures required by the Technical Specifications as criteria for determining compliance.

The team conducted in-office inspection and reviewed:

- Appropriate program documents, procedures and evaluations related to the radiological effluent controls program listed in the attachment to this report;
- The implementation of the Radiological Effluent Controls Program requirements as described in Radiological Effluent Technical Specifications;

- Changes, if any, to the liquid or gaseous radioactive waste system design, procedures, or operation as described in the Final Safety Analysis Report Update;
- Changes, if any, to the Offsite Dose Calculation Manual made by the licensee since the last inspection;
- Effluent monitoring instrumentation documentation to ensure adequate methods and monitoring of effluents;
- The program for identifying, assessing, and controlling contaminated spills and leaks;
- The annual effluent release reports and the correlation to the environmental monitoring results;
- The results from quality assurance audits.

The team conducted an onsite inspection which included interviewing cognizant licensee personnel, performing walkdowns of facilities and equipment, and observing licensee activities to review:

- The gaseous and liquid discharge system configuration;
- Selected point of discharge effluent radiation monitoring systems and flow measurement devices;
- The observation of selected portions of the routine processing and discharge of radioactive gaseous and liquid effluent (sample collection and analysis) including a selection of radioactive gaseous and liquid waste effluent discharge permits;
- Effluent discharges made with inoperable (declared out-of-service) effluent radiation monitors including the projected doses to members of the public;
- Surveillance test results on non-safety related ventilation and gaseous discharge systems (high efficiency particulate air and charcoal filtration) including the methodology to determine the stack and vent flow rates;
- The identification of non-radioactive systems that have become contaminated, if applicable;
- Effluent monitoring instrument (installed and counting room) maintenance, quality control, and calibration;

- The methods used to determine the isotopes in the plant source term, meteorological dispersion and deposition factors, and hydrogeologic characteristics used in the Offsite Dose Calculation Manual and effluent dose calculations including a selection of monthly, quarterly, and annual dose calculations;
- The land-use census;
- Records of abnormal gaseous or liquid discharges, if any, including the evaluation and analysis of events involving spills or discharges, dose assessments to members of the public, required (or voluntary) offsite notifications, and assessments and reporting of abnormal discharges in the Annual Radiological Effluent Release Report;
- Evaluations of discharges from onsite surface water bodies, if any;
- Routine groundwater monitoring results;
- Audits and self-assessments; licensee event reports or special reports, if any were required since the previous inspection;
- The results of the inter-laboratory comparison program;
- Effluent sampling records;
- The calibration of post-accident effluent monitoring instrumentation and expected accident source.

The team reviewed the licensee's program of problem identification and resolution, including:

- Placement of problems identified through audits, self assessments, and monitoring results into the corrective action program and adequacy of immediate and long term corrective actions;
- Problem identification and resolution follow-up activities;
- Identification of repetitive deficiencies or significant individual deficiencies in problem identification and resolution identified by the licensee's self-assessment activities.

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of three of the required three samples, as defined in Inspection Procedure 71122.01-05.

b. Findings

No findings of significance were identified.

**2PS2 Radioactive Material Processing and Transportation (71122.02)**

a. Inspection Scope

This area was inspected to verify that the licensee's radioactive material processing and transportation program complies with the requirements of 10 CFR Parts 20, 61, and 71 and Department of Transportation regulations contained in 49 CFR Parts 171-180. The team interviewed licensee personnel and reviewed:

- The radioactive waste system description, recent radiological effluent release reports, and the scope of the licensee's audit program;
- Liquid and solid radioactive waste processing systems configurations, the status and control of any radioactive waste process equipment that is not operational or is abandoned in place, changes made to the radioactive waste processing systems since the last inspection, and current processes for transferring radioactive waste resin and sludge discharges;
- Radio-chemical sample analysis results for radioactive waste streams and use of scaling factors and calculations to account for difficult-to-measure radionuclides;
- Shipment packaging, surveying, labeling, marking, placarding, vehicle checking, driver instructing, and disposal manifesting;
- Shipping records for non-excepted package shipments;
- Audits and self-assessments, licensee event reports, special reports, audits, and state agency reports, if any were required since the previous inspection.

Either because the conditions did not exist or an event had not occurred, no opportunities were available to review the following items:

- Licensee event reports or special reports

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of six of the required six samples, as defined in Inspection Procedure 71122.02-05.

b. Findings

No findings of significance were identified.

## **2PS3 Radiological Environmental Monitoring Program and Radioactive Material Control Program (71122.03)**

### **a. Inspection Scope**

This area was inspected to ensure that the radiological environmental monitoring program verifies the impact of radioactive effluent releases to the environment and sufficiently validates the integrity of the radioactive gaseous and liquid effluent release program; and that the licensee's surveys and controls are adequate to prevent the inadvertent release of licensed materials into the public domain. The team used the requirements in 10 CFR Part 20, Appendix I of 10 CFR Part 50, the Offsite Dose Calculation Manual, and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed:

- Annual environmental monitoring reports and licensee event reports, if any were required since the previous inspection;
- Selected air sampling and thermoluminescence dosimeter monitoring stations;
- Collection and preparation of environmental samples;
- Operability, calibration, and maintenance of meteorological instruments;
- Each event, if any, documented in the Annual Environmental Monitoring Report which involved a missed sample, inoperable sampler, lost thermoluminescence dosimeter, or anomalous measurement;
- Significant changes, if any, made by the licensee to the Offsite Dose Calculation Manual as the result of changes to the land census or sampler station modifications since the last inspection;
- Calibration and maintenance records for air samplers, composite water samplers, and environmental sample radiation measurement instrumentation, quality control program, interlaboratory comparison program results, and vendor audits;
- Locations where the licensee monitors potentially contaminated material leaving the radiological controlled area [or controlled access area] and the methods used for control, survey, and release from these areas;
- Type of radiation monitoring instrumentation used to monitor items released, survey and release criteria of potentially contaminated material, radiation detection sensitivities, procedural guidance, and material release records;
- Audits, self-assessments, corrective action documents and licensee event reports or special reports, if any were required, since the previous inspection.

Either because the conditions did not exist or an event had not occurred, no opportunities were available to review the following items:

- Licensee event reports or special reports

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of ten of the required ten samples, as defined in Inspection Procedure 71122.03-05.

b. Findings

No findings of significance were identified.

**4. OTHER ACTIVITIES**

**40A2 Problem Identification and Resolution**

Annual Sample Review

a. Inspection Scope

The team evaluated the effectiveness of the licensee's problem identification and resolution process with respect to the following inspection areas:

- Radiation Monitoring Instrumentation; (Section 2OS3)
- Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems; (Section 2PS1)
- Radioactive Material Processing and Transportation; (Section 2PS2)
- Radiological Environmental Monitoring Program and Radioactive Material Control Program. (Section 2PS3)

b. Findings and Observations

No findings of significance were identified.

#### 4OA5 Other Activities

.1 (Closed) Temporary Instruction (TI) 2515/173, "Review of the Implementation of the Industry Groundwater Protection Voluntary Initiative"

a. Inspection Scope

An NRC assessment was performed of the licensee's groundwater protection program to determine whether the licensee implemented the voluntary Industry Groundwater Protection Initiative, dated August 2007 (Nuclear Energy Institute 07-07, ADAMS accession number ML072610036). Inspectors interviewed personnel, performed walk-downs of selected areas, and reviewed the following items:

- Records of the site characterization of geology and hydrology;
- Evaluations of systems, structures, and or components that contain or could contain licensed material and evaluations of work practices that involve licensed material for which there is a credible mechanism for the licensed material to reach the groundwater;
- Implementation of an onsite groundwater monitoring program to monitor for potential licensed radioactive leakage into groundwater;
- Procedures for the decision making process for potential remediation of leaks and spills, including consideration of the long term decommissioning impacts;
- Records of leaks and spills recorded, if any, in the licensee's decommissioning files in accordance with 10 CFR 50.75(g);
- Licensee briefings of local and state officials on the licensee's groundwater protection initiative;
- Protocols for notification to the local and state officials, and to the NRC regarding detection of leaks and spills;
- Protocols and/or procedures for thirty day reports if an onsite groundwater sample exceeds the criteria in the radiological environmental monitoring program;
- Groundwater monitoring results as reported in the annual effluent and/or environmental monitoring report;
- Licensee and industry assessments of implementation of the groundwater protection initiative.

b. Findings

No findings of significance were identified. Under the Ground Water Protection Initiative, each site was to have developed an effective, technically sound groundwater protection program by August 2008. The licensee completed its Ground Water Protection Initiative program self-assessment on October 28, 2008. The team identified that the licensee had not fully documented agreements on differences to protocols for notification to local and state officials regarding detection of leaks and spills. The findings from the licensee's self-assessment and the NRC observations were entered into the corrective action program. The Nuclear Energy Institute self-assessment is scheduled to be completed in July 2009.

**4OA6 Management Meetings**

Exit Meeting Summary

On January 30, 2009, the team presented the inspection results to Mr. R. Bement, Vice President, Nuclear Operations, and other members of his staff who acknowledged the findings. The team confirmed that proprietary information was not provided or examined during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION



## **SUPPLEMENTAL INFORMATION**

### **Licensee Personnel**

S. Bauer, Director, Regulatory Affairs  
R. Bement, Vice President, Nuclear Operations  
R. Black, Engineer, Operation Computer Support  
C. Bonhoff, Section Leader, RP Technical Services  
L. Cortopossi, Plant Manager, Nuclear Operations  
T. Dickinson, Senior Technical Advisor, Radiation Protection  
J. Gaffney, Director, Radiation Protection  
T. Gray, Department Leader, Radiological Support Services  
D. Hautala, Senior Engineer, Regulatory Affairs  
H. Lesan, Section Leader, Environmental  
J. McDonnell, Department Leader, Radiation Protection Operations  
C. McFarlane, Advisor, Radiation Protection/Chemistry  
D. Mims, Vice President, Regulatory Affairs and Plant Improvement  
T. Phillips, Engineer, Operation Computer Support  
C. Podgurski, Section Leader, Dosimetry, Radiation Protection  
T. Radtke, General Manager, Emergency Services and Support  
R. Routolo, Section Leader, Radiation Protection  
M. White, Program Advisor, Fire Protection Administration

### **NRC**

R. Treadway, Senior Resident Inspector

## **LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

### **Opened and Closed During this Inspection**

NONE

### **Previous Items Closed**

NONE

### **Previous Items Discussed**

NONE

## LIST OF DOCUMENTS REVIEWED

### Section 2OS3: Radiation Monitoring Instrumentation and Protective Equipment (IP71121.03)

#### Procedures

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
14DP-9IS01	Respiratory Equipment Maintenance, Inspection, and Repair	10
75RP-9EQ13	Canberra Whole Body Counting System Calibration	4
75RP-9EQ20	Calibration Of Portable Gamma And Beta-Gamma Dose Rate Instruments	8

#### Audits and Self-assessments

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
2008-012	Radiation Protection Audit	11/18/08
2006-012	Radiation Safety Audit	11/19/06

#### Effluent Monitor Calibrations

<u>Unit</u>	<u>Channel No.</u>	<u>Monitor Description</u>	<u>Surveillance Procedure</u>	<u>Calibration Dates</u>
1	RU-143	Plant vent/low range noble gas	74ST-9SQ26	1/02/07, 7/11/08
2	RU-144	Plant vent/high range noble gas	74ST-9SQ27	3/08/07, 7/25/08
3	RU-145	Fuel building/low range noble gas	74ST-9SQ28	12/04/08
1	RU-146	Fuel building/low range noble gas	74ST-9SQ29	10/03/06, 2/22/08
2	J-CPN-FT0042	Effluent Process Flow	74ST-9SQ12	6/20/07, 11/15/08
3	J-CPN-FT0042	Effluent Process Flow	74ST-9SQ12	12/19/06, 5/07/08

#### Area Monitor Calibrations

<u>Unit</u>	<u>Channel No.</u>	<u>Monitor Description</u>	<u>Surveillance Procedure</u>	<u>Calibration Dates</u>
2	RU-148 RU-149	In Containment Area	74ST-9SQ23	10/03/06, 4/03/08
2	RU-150 RU-151	Primary Coolant	74ST-9SQ23	10/03/06, 4/03/08
1	RU-17	Incore Instrument Area	WO#3097888	10/04/08

### Radiation Protection Instrumentation Calibrations

<u>Model No.</u>	<u>Instrument Type</u>	<u>Calibration Date</u>
Fastscan 1	Whole Body Counter	8/22/08
Fastscan 2	Whole Body Counter	9/02/08
2380	E520	1/04/09
1893	40GL	9/11/08
100143	732GM Probe	9/11/08
563	SAC4	9/10/08
4111	PM-7	10/01/08
410	PM-7	9/04/08
9118	PCM-2	8/07/08
1298	PCM-2	1/20/09
10301	Tool Monitor	9/05/08
322001	Tool Monitor	9/05/08
18301	Tool Monitor	9/23/08
50201	Tool Monitor	9/23/08

### Corrective Action Program Documents

2969003	2970616	2973742	3035353	3060232
31011599	3145108	32029 71	3244247	3266828

### **Section 2PS1: Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems (IP71122.01)**

#### Procedures

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
33DP-0AP03	Ventilation Filter Test Program	4
73DP-0AP06	HVAC System Performance Testing Program	6
74ST-9SQ12	Effluent Flowpath Process Flow Calibration	9
74ST-9SQ15	RU-143 and RU-144 Quarterly Function Test Procedure	10
74ST-9SQ01	Effluent Monitoring System Daily Surveillance Test	11
74RM-9EF20	Gaseous Radioactive Release Permits and Offsite Dose Assessment	15
74RM-9EF42	Radiation Monitor Alarm Setpoint Determination	22
74RM-9EF43	Actions for Inoperable Radiation Monitors: Preplanned Alternate Sampling Program	11

### Miscellaneous Documents

2006 Annual Radioactive Effluent Release Report  
2007 Annual Radioactive Effluent Release Report  
Offsite Dose Calculation Manual, Revision 23

### Corrective Action Program Documents

2960165	2964843	3004531	3046218	3060232
3101599	3145108	3150810	3194449	3194449
3244247				

### Gaseous Release Permits

20071012	20071019	20071027	20071061	20072005
20072017	20073021	2007302	20073052	20081202
20083163	20092004			

## **Section 2PS2: Radioactive Material Processing and Transportation (IP71122.02)**

### Procedures

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
75DP-0RP01	RP Program Overview	8
76DP-0RP01	Radwaste Management Program Overview	4
76DP-0RP03	Radwaste Process Control Program	6
76DP-0RP04	Receipt and Shipment of Radioactive Material	5
76DP-0RW04	Receipt of Radioactive Material	2
76DP-0RW05	Packaging and Classification of Radioactive Waste	3
74DP-9CY08	Radiological Monitoring Program	20
75RP-9RP15	Control and Storage of Radioactive Material and Radioactive Wastes	20

## **Section 2PS2: Radioactive Material Processing and Transportation (IP71122.02)**

### Procedures

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
75RP-9RP28	Radioactive Process Filter Management	2
15TD-0TT01	Radiation Protection Training Guide	6

### Radioactive Waste Shipments

<u>NUMBER</u>	<u>TITLE</u>
07-RW-007	Type B Shipment
07-RW-030	Sealand Container LSA
08-SH-021	DOT 7A Type A Package
08-RW-024	Demineralizer Resin
08-RW-030	Sealand Container LSA
08-RW-041	Sealand Container DAW

### Corrective Action Program Documents

2965984	2968704	2984659	2991660	3026618
3033295	3042985	3048481	3048483	3048487
3071730	3075830	3090121	3090705	3105145
3105460	3157042	3158817	3160980	3164665
3190086	3224218	3246984	3255813	3264527

### Miscellaneous Documents

2006 Annual Radioactive Effluent Release Report  
2007 Annual Radioactive Effluent Release Report  
Offsite Dose Calculation Manual, Revision 23

**Section 2PS3: Radiological Environmental Monitoring Program and Radioactive Material Control Program (IP71122.03)**

Procedures

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
74DP-9CY08	Radiological Monitoring Program	30
74RM-0EN02	Radiological Environmental Air Sampling Program	18
74RM-0EN03	Radiological Environmental Sampling Program	26
74RM-0EN07	Land Use Census,	12
75RP-9RP09	Release of Vehicles, Equipment, and Material from Radiological Controlled Areas,	36

Meteorological Instrument, Environmental Lab, Air Sampler Calibrations

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
77ST-9RG02	Meteorological System Calibration Redundant System	11/17/08
LZ44830	Mass Flow Meter Evaluations	01/14/08

Miscellaneous Documents

2007 Land Use Census,

2008 Land Use Census,

2006 Annual Radioactive Effluent Release Report

2007 Annual Radioactive Effluent Release Report

Annual Environmental Operating Report 2007

## **Section 4OA5 Temporary Instruction (TI) 2515/173**

### Procedures

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
75PR-9AP01	Groundwater Protection Program	1

### Miscellaneous Documents

NEI 07-07 Industry Groundwater Protection Initiative – Final Guidance Document

CRDR 2874033 Decommissioning Record, July 21, 2008

PVNGS Groundwater Monitoring Program and Compliance with the NEI Groundwater Protection Initiative, April 1, 2008

Retention Basin Clean Closure Report Decommissioning Record, September 16, 2008

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### Corrective Action Documents

37277512      37277110      2874033