

RADIATION WORK PERMIT

ACTIVITY: OC 1 YEAR: 09 RWP NUMBER: 00068 REVISION: 00 TYPE: SPC
 LOCATION: COND23 CBA ELEVATION: _____ ROOM: _____ AREA: _____
 TITLE: CST UNDERGROUND PIPING WELD AND HOT TAP

INITIATED: 04/21/09 SCHEDULED START: 04/25/09 EXPECTED COMPLETE: 01/01/10
 ALARA CATEGORY : 0

PROTECTIVE CLOTHING AND RESPIRATORY PROTECTION REQUIREMENTS

					Pipe cutting

DOSIMETRY REQUIREMENTS

EXTREMITY - HANDS : _____ MULTIPLE DOSIMETRY: _____
 EXTREMITY - FEET : _____ RELOCATE DOSIMETRY: _____ ION CHAMBER : _____

ADMINISTRATIVE / EXPOSURE CONTROL REQUIREMENTS

MINIMUM TEDE BALANCE OF 200 MREM REQUIRED FOR ENTRY
 PRE-JOB MEETING REQUIRED : Y AUTO ENTRY/EXIT PERMITTED : Y
 WORK ORDER NUMBER REQUIRED: N SIGNATURE CHECK AT SIGN-IN: Y

HEALTH PHYSICS COVERAGE AND MONITORING PERIOD

SURVEY FREQ: 1 ROUTINE SURVE REQD-IF: BREACH OF SYSTEM
 HP COVERAGE: INTERMITTENT

SPECIAL INSTRUCTIONS / REMARKS

- MICRO ALARA PLAN#09-068-ALL PERSONNEL TO READ AND COMPLY WITH M.A.P.
- * DOCUMENT BRIEFING ON PROC. RP-AA-401 (ATT.4).
- * KNOWLEDGE OF RAD CONDITIONS REQ'D PRIOR TO ENTRY TO RCA W/OUT RPT ESCORT.
- * PERSONNEL MONITORING PER RP.
- * SURVEY REQUIRED AT SYSTEM OPENING.
- * AIR SAMPLING PER MICRO ALARA PLAN #09-068.
- * WORKERS SHALL WEAR DOSIMETRY SO THEIR EXPOSURE CAN BE MONITORED IN ANY RCA.
- * PC REQUIREMENTS PER RADIOLOGICAL POSTINGS OR PER RP.
- * ERECT A TENT OR SIMILAR ENCLOSURE AT CUTTING LOCATION PER THE MICRO ALARA PLAN #09-068.
- * HEPA UNIT REQUIRED TO CREATE A NEGATIVE PRESSURE INSIDE OF THE TENT. PER MICRO ALARA PLAN #06-068.

(SPECIAL INSTRUCTIONS ARE CONTINUED ON NEXT PAGE)

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APPROVALS / TERMINATION

	Name	Date	Signatures
PREPARED BY :	<u>FIONA M.ROBERTS</u>	<u>04/21/09</u>	
WORK SUPERVISOR:	<u>RABY, J</u>	<u>04/21/09</u>	
HP SUPERVISOR :	<u>HEFFNER, ROBERT</u>	<u>04/21/09</u>	
TERMINATED BY :	_____	_____	
POST JOB REVIEW:	_____	_____	

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SPECIAL INSTRUCTIONS / REMARKS

* OE- AR#674916 CONTAMINATION FOUND OUTSIDE CONTAMINATION AREA, BUT IN RCA
*

TASK NBR

DESCRIPTION

104

HP - JOB COVERAGE

*** END OF WORK PERMIT REPORT ***

PROD REGION

RADIATION WORK PERMIT

ITILE: CST UNDERGROUND PIPING WELD AND HOT TAP

OC-1-09-068MAP09-068 OC1090006800

PRE-JOB MTG REQD: YES



HP COVERAGE CODE: INTERMITTENT

ALARMING DOSIMETER: ED SET POINT: 0040 MREM OR 0080 MREM/HR

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-

**ATTACHMENT 9
Micro ALARA Plan (MAP) Work Sheet
MAP 08-068**

RWP Number:	<u>OC-1-09-068</u>	MAP Number:	<u>09-068</u>	WO Number:	<u>C2021075</u>
Job Description:	CST Underground Piping Weld and Hot Tap				
<i>Original Estimates:</i>					
Exposure:	<u>2</u>	Millirem	Time:	<u>43</u>	person-hours
<i>MAP Estimates:</i>					
Exposure:	<u>2</u>	Millirem	Time:	<u>43</u>	person-hours
Exposure Challenge Goal:	<u>1</u>	Millirem			

Note: MAP Estimates at or above 1000 millirem (1.0 rem) require formal ALARA Plan documentation.

Review Work Scope, utilizing job site walkdowns and craft input meetings as necessary, to evaluate the following Micro ALARA Planning controls and concepts:

MAP Concept / Control	Yes	No	N/A	MAP Concept / Control	Yes	No	N/A
Minimize Crew Size	X	<input type="checkbox"/>	<input type="checkbox"/>	Modify System Configuration	<input type="checkbox"/>	<input type="checkbox"/>	X
Utilize Low Dose Area	<input type="checkbox"/>	<input type="checkbox"/>	X	Use Mock-up Training	<input type="checkbox"/>	X	<input type="checkbox"/>
Use Experienced Craft	X	<input type="checkbox"/>	<input type="checkbox"/>	Re-Sequence / Schedule	<input type="checkbox"/>	<input type="checkbox"/>	X
System Flushing	<input type="checkbox"/>	X	<input type="checkbox"/>	Improve Physical Work Area	<input type="checkbox"/>	X	<input type="checkbox"/>
Hydrolasing	<input type="checkbox"/>	<input type="checkbox"/>	X	Remove Component to LDA	<input type="checkbox"/>	<input type="checkbox"/>	X
Shielding Installation	<input type="checkbox"/>	<input type="checkbox"/>	X	Use HEPA Ventilation	X	<input type="checkbox"/>	<input type="checkbox"/>
Remote Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	X	Develop High Rad Trash Plan	<input type="checkbox"/>	X	<input type="checkbox"/>
Remote Tooling	<input type="checkbox"/>	<input type="checkbox"/>	X	Use Teledosimetry	<input type="checkbox"/>	<input type="checkbox"/>	X
Robotics	<input type="checkbox"/>	<input type="checkbox"/>	X	Scaffold Type Review	<input type="checkbox"/>	<input type="checkbox"/>	X
TEDE ALARA / RRPCE	<input type="checkbox"/>	<input type="checkbox"/>	X	Work Bundling	<input type="checkbox"/>	<input type="checkbox"/>	X

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Describe Micro ALARA Plan controls implemented and expected benefits:

- This MAP is for contamination control outside of the main RCA. Activities covered are CST Underground Piping Weld and Hot Tap, and RP support
- No system breach allowed during inclement weather (i.e., rain, high winds).
- Erect a tent or similar enclosure at cutting location. Tent will have a non-porous floor.
- Ensure that all discharge line mechanical fittings have secondary containments. Periodically monitor discharge hoses to verify no leaks.
- Hepa ventilation will be used to create a negative pressure inside of the tent. Stop work if negative pressure inside of the tent is lost. Reestablish prior to restarting work. Discharge HEPA to a monitored release path, TB has been used in the past.
- RPT will perform survey to verify dose rates and contamination levels.
- RP Tech will brief all personnel of dose rates before entry.
- RPT to verify area is properly posted.
- RPT (or other individual authorized by RP Supervision) to escort RAM movement from one RCA to another.
- Obtain at a minimum, one breathing zone air sample during system breach.
- Obtain a low vol air sample inside of the tent.

Review / Include applicable Operating Experience, Lessons Learned, and job history:

AR # 674916

Condition Description: 4-6K dpm/LAW found on pavement outside CA at TWST during demob of tent and area. Contamination was at base of tent and approximately 1/2 square foot. Area outside tent is posted RA, RMA, RWP.

Immediate actions taken:

notified supervision, duty station mgr, RPM, WWM and duty shift mgr. decon of affected area

Recommended Actions:

continuation of demob to see if any contamination is under the floor boards.

Operable Basis:

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N/A

Reportable Basis:

Contamination was found outside of a posted contamination area but inside of an RCA. This is not reportable per the Exelon report-ability manual.

Reviewed by: CARL J SUCHTING 09/25/2007 00:02:21 CDT

Reviewer Comments:

Reviewed by: 09/25/2007 07:35:21 CDT

Reviewer Comments:

9/25/07 VJF > direct frisk of pavement inside and outside posted area showed no detectable activity above background. Smear of contaminated area was 6-8K dpm/100cm². Contamination was deconned to no detectable activity.

SOC Reviewed by: JERE E FREEMAN JR 10/12/2007 09:11:23 CDT

SOC Comments:

09/25/07 Follow-up RP

Close to WGE, to RP - WGE to address cause of contamination event. WGE due 10/09/07.

Follow-up RP

09/28/07 KB - returned by MRC for RP to conduct a WGE. Department review performed by: 10/02/2007 08:09:08 CDT

Evaluation Comments:

Condition/Problem Statement: Contamination found on pavement outside contamination area at Torus Water Storage Tank (TWST). Contamination was inside radiological area posted Radiation Area/Radioactive Material Area (RA/RMA). Condition was found during demobilization of area while taking down the containment tent at the TWST manway.

Statement of Cause: Sludge from the tank was placed into drums inside the containment tent at the manway. Due to rain and the front entrance to the tent not being sealed, water entered the tent, and some of the sludge on the herculited containment tent floor migrated through a failed seam and found its way outside the containment tent onto the pavement.

Extent of Condition: Contamination was contained to a small 0.5 ft² area. This area was immediately deconned and survey CAA-07-06888 was done and no contamination was found in adjacent areas inside and outside the posted RA/RMA. No other containment tents are currently in use in the plant and the area at the TWST was demobed and down posted to an RMA at the TWST

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fence.

Evaluation of any SOC Comments: Work Group Eval complete and action item (674916-02) created to evaluate the use of a sealed containment tent and/or use of a drip pan under the containment tent in the future and captured lessons learned in ALARA plan post-job review.

Manager review performed by: JOHN A RENDA 10/09/2007 09:25:51 CDT

Manager Comments:

Action item #2 updated to include use of a sealed containment tent and/or drip pan and add lessons learned to the Alara plan post job review.

MRC Reviewed by: TIMOTHY SEXSMITH 10/10/2007 11:18:28 CDT

MRC Comments:

10/10/07 - KB - returned by MRC to incorporate comments

Comments / Discussion:

The major concerns with this evolution are the potential to have an unmonitored release or a spill of radioactive material to the environment. This is a very low dose evolution. Due diligence by the work group and Rad Protection is required to avoid any unmonitored releases or spills of radioactive material to the environment.

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MAP 08-068

Approvals: (signature)

Originator: Jeanette Raby/ -s- Date: 4/22/09

Task Manager: Gary True/-s- Date: 4/26/09

RP Supervisor: Bob Heffner/-s- Date: 4/22/09