

PRE-INSPECTION COVER SHEET AND INSPECTION PLAN

CM
10/18

INSPECTORS:

Lead: Ronald Rolph
 Other: _____

FACILITY: Pilgrim
 REPORT NO: 05000293/2010005
 INSP DATES: 10/18-21/2010
 DRP INSP END DATE: * 12/31/2010

***If feeder, include resident inspection period end date.**

Check One:

Feeder ---X--- _____ DRS ___---X--- _____ Team _____

Type of Inspection: (Check One)

PIR _____ Supplemental _____ SSDI _____ Exams _____
 Re-Qual (Feeders) _____ EP Exercise _____ EP Program _____ OSRE _____
 SPA _____ Baseline -----X-----

INSPECTION PLAN (ATTACHED OR SUMMARIZED BELOW): see attached

_____ ATTACHED _____

INSPECTION PROCEDURE DATA

<u>Procedure-Occ. Nos</u>	<u>IPE Code</u>	<u>Title of Procedure</u>	<u>In RPS/IP (Y/N)</u>
<u>71124 - 01</u>	<u>BI</u>	<u>Radiological Hazard Assessment and Exposure Control</u>	<u>Y</u>
<u>71124 - 02</u>	<u>BI</u>	<u>Occupational ALARA Planning and Control</u>	<u>Y</u>
<u>TI2515/179</u>	<u>-</u>	<u>Verification of NSTS</u>	<u>Y</u>

IFS ITEMS ASSIGNED FOR REVIEW

<u>Procedure-Occ. Nos</u>	<u>IPE Code</u>	<u>IFS Number</u>	<u>Brief Description</u>
<u>None -</u>	_____	_____	_____
<u>-</u>	_____	_____	_____
<u>-</u>	_____	_____	_____

ALLEGATIONS ASSIGNED FOR REVIEW

<u>Procedure-Occ. Nos</u>	<u>IPE Code</u>	<u>ALG -Number</u>	<u>Brief Description</u>
<u>-</u>	<u>AF</u>	_____	_____
<u>None -</u>	<u>AF</u>	_____	_____
<u>-</u>	<u>AF</u>	_____	_____

PROJECTS COORDINATION: Date Discussed with DRP Branch Chief: _____

COORDINATED: _____ (DRP) ACKNOWLEDGED: _____ (Accomp. Insp. Super.) APPROVED: [Signature] (Inspector's Supervisor)

ARRANGEMENTS:

Hotel: Hilton Garden Inn Phone: 508-830-0200
 Contact: _____ Phone: _____

Occupational ALARA Planning and Control
71124.02
Inspection Plan

- 1) Review collective exposure history, current exposure trends, and ongoing or planned activities to assess current performance and exposure challenges. (2.01 a.)
- 2) Review the site-specific trends in collective exposures and source term measurements. (2.01 b.)
- 3) Review the site-specific procedures associated with maintaining occupational exposures ALARA. (2.01 c.)
- 4) Review the ALARA work activity evaluations, exposure estimates, and exposure mitigation requirements for three to five work activities for the highest exposure significance greater than or equal to 5 person-rem. (2.02 a. & b.)
- 5) Verify for the activities in 4 above that the licensee's planning identified appropriate dose mitigation features; considered alternate mitigation features; and defined reasonable dose goals. (2.02 c.)
- 6) Compare the results achieved with the intended dose established in the licensee's ALARA planning. (2.02 d.)
- 7) Verify that post-job reviews were completed and that problems were identified and entered into the CR program. (2.02 e.)
- 8) Review the current annual collective exposure estimate for reasonable accuracy. (2.03 a.)
- 9) Verify that the licensee has established measures to track, trend, and if necessary to reduce, occupational doses for ongoing work activities. (2.03 b.)
- 10) Evaluate the licensee's method for adjusting exposure estimates, or re-planning work, when unexpected changes in scope or emergent work are encountered. (2.03 c.)
- 11) Verify through the historical trends and current status of plant source terms that the licensee is making allowances or developing contingency plans for expected changes in the source term as the result of changes in plant fuel performance issues or changes in plant chemistry. (2.04)
- 12) Observe radiation worker and radiation protection technician performance during work activities being performed in radiation areas, airborne radioactivity areas, or high radiation areas. (2.05)
- 13) Verify that problems associated with ALARA planning and controls are being identified by the licensee at an appropriate threshold and are properly addressed for resolution in the licensee CR program. (2.06)

Radiological Hazard Assessment and Exposure Controls
71124.01
Inspection Plan

- 1) Review any available audit or self-assessments of the radiation protection program. (2.01)
- 2) Review any reports of operational occurrences related to occupational radiation safety. (2.01)
- 3) Determine if there have been changes to plant operations that could result in significant radiological hazards and verify that the site has evaluated the potential impact. (2.02 a.)
- 4) Review the last two surveys from three to six plant areas.(2.02 b.)
- 5) Conduct walk-downs of the facility. (2.02 c.)
- 6) Verify that appropriate pre-work surveys were performed for three to five radiologically risk significant work activities. (2.02 d.)
- 7) Verify three to five air sample surveys were collected and analyzed in accordance with licensee procedures. (2.02 e.)
- 8) Verify three to five containers holding none-exempt licensed radioactive materials are labeled and controlled in accordance with 10 CFR 20.1904. (2.03 a.)
- 9) Review three to five RWPs used to access HRA areas. (2.03 b.)
- 10) Review CRs associated with EPD alarms. (2.03 c.)
- 11) Verify that the licensee has established a means to inform workers of changes that could significantly impact their occupational dose. (2.03 d.)
- 12) Review licensee procedures for the survey and release of material from the RCA. (2.04 a.)
- 13) Verify release surveys are performed in accordance with licensee procedures. (2.04 a.)
- 14) Review the licensee's criteria for the survey and release of potentially contaminated material and verify that there is guidance on how to respond to alarms. (2.04 b.)
- 15) Verify that the radiation detection instrumentation is used at its typical sensitivity level. (2.04 c.)
- 16) Verify that sources are accounted for and are intact. (2.04 d.)
- 17) Verify that transactions involving nationally tracked sources were reported appropriately.(2.04 e.)
- 18) Verify that existing conditions are consistent with posted surveys, RWPs, and worker briefings. (2.05 a.)
- 19) Verify the adequacy of radiological controls during job performance observations. (2.05 b.)
- 20) Verify dosimetry placement is appropriate. (2.05 c. & d.)
- 21) Evaluate airborne radioactive controls and monitoring. (2.05 e.)
- 22) Verify physical and programmatic controls for highly activated or contaminated materials are appropriate to preclude inadvertent removal from the spent fuel or other pools. (2.05 f)
- 23) Verify postings and physical controls for HRAs are appropriate. (2.05 g.)
- 24) Discuss with the RPM the controls and procedures for high-risk HRAs and VHRAs. (2.06 a.)
- 25) Discuss with HP supervisors the controls in place for special areas that have the potential to become VHRAs during certain plant operations. (2.06 b.)
- 26) Verify individuals can not gain unauthorized access to VHRAs. (2.06 c.)
- 27) Observe radiation worker job performance. (2.07 a.)
- 28) Review CRs associated with radiation worker job performance. (2.07 b.)
- 29) Observe radiation protection technician job performance. (2.08 a.)
- 30) Review CRs associated with radiation protection technician job performance. (2.08 b.)
- 31) Verify that problems associated with radiation monitoring and exposure control are being identified at an appropriate threshold and are properly addressed for resolution in the CR system. (2.09)