

September 12, 2012

MEMORANDUM TO: Joseph Giitter, Director
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Undine S. Shoop, Chief */RA/*
Health Physics and Human Performance Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: Public Meeting Announcement – Proposed Performance Indicator
Frequently Asked Questions – Occupational Radiation Protection
Cornerstone

DATE AND TIME: September 27, 2012
Time: 9:00 am – 12:00 pm

LOCATION: U.S. Nuclear Regulatory Commission
Room O-16B4
11555 Rockville Pike
Rockville, MD 20852

PURPOSE: To discuss proposed Frequently Asked Question(s) (FAQ) for the
Performance Indicator in the Occupational Radiation Safety
Cornerstone for Technical Specification High Radiation Area
Occurrences

CATEGORY*: This is a Category 2 meeting. The public is invited to participate in
this meeting by discussing regulatory issues with the Nuclear
Regulatory Commission (NRC) at designated points identified on
the agenda.

The NRC provides reasonable accommodation to individuals with
disabilities where appropriate. If reasonable accommodations are
needed to participate in this meeting, or if a meeting notice,
transcript, or other information from this meeting is needed in
another format (e.g., Braille, large print), please notify the NRC
meeting contact. Determinations on requests for reasonable
accommodation will be made on a case-by-case basis.

CONTACT: Steven Garry, NRR
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steven.garry@nrc.gov

U. Shoop

- 2 -

AUDIO-TELE-
CONFERENCEING

Interested members of the public can participate in the meeting via a toll-free audio teleconference. Call the toll-free number 888-606-8407 and enter pass code 69577 # when prompted.

PARTICIPANTS:

NRC	Industry
Roger Pedersen	Ralph Andersen, NEI
Steven Garry	Ellen Anderson, NEI
Richard Conatser	Other industry representatives
Undine Shoop	

Enclosures:

Enclosure 1: Agenda

Enclosure 2: Proposed Performance Indicator Frequently Asked Question

* Commission's Policy Statement on "Enhancing Public Participation in NRC Meetings,"
67 *Federal Register* 36920, May 28, 2002.

U. Shoop

- 2 -

**AUDIO-TELE-
CONFERRING**

Interested members of the public can participate in the meeting via a toll-free audio teleconference. Call the toll-free number 800-369-1915 and enter pass code 50263 # when prompted.

PARTICIPANTS:

<p>NRC Roger Pedersen Steven Garry Richard Conatser Undine Shoop</p>	<p>Industry Ralph Andersen, NEI Ellen Anderson, NEI Other industry representatives</p>
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Enclosure:s

Enclosure 1: Agenda

Enclosure 2: Proposed Performance Indicator Frequently Asked Question

* Commission's Policy Statement on "Enhancing Public Participation in NRC Meetings," 67 *Federal Register* 36920, May 28, 2002.

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ADAMS ACCESSION NUMBER: ML12088A292

OFFICE	AHPB:DRA	BC:AHPB:DRA
NAME	SGarry	UShoop
DATE	9/12/12	09/12/12

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PUBLIC MEETING AGENDA
Performance Indicator Frequently Asked Questions
Occupational Exposure Control Effectiveness

SEPTEMBER 27, 9:00 AM – 12:00 PM; ONE WHITE FLINT ROOM 16B4

Attendees are encouraged to arrive 10 – 15 minutes early to facilitate on-time start

9:00 - 9:15 AM	Administrative 1. Introductions 2. Agenda review 3. Category 2 Public Meeting reminder
9:15 – 10:00 AM	NEI introduction to Proposed Changes to Frequently Asked Questions
10:00 AM – 11:00 AM	NRC and NEI/industry discussion of proposed change
11:00 AM – 11:30 AM	Other miscellaneous radiological topics
11:30 PM - 12:00 PM	Public comments

Proposed Performance Indicator Frequently Asked Question

Plant: Perry

Date of Event: June 2, 2012

Submittal Date: August 16, 2012

Contact: John Pelcic

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Tel/email: 440-280-5824

NRC Contact: Mark Marshfield

mark.marshfield@nrc.gov

Tel/email: 440-280-5822

Performance Indicator: OR01 Occupational Exposure Control Effectiveness

Site-Specific FAQ (Appendix D)? No

FAQ requested to become effective when approved.

Question Section

NEI 99-02 Guidance needing interpretation (include page and line citation)

Page 62, Lines 16 - 22, and associated footnote

Technical Specification High Radiation Area (>1 rem per hour) Occurrence – A nonconformance (or concurrent nonconformances) with technical specifications or comparable requirements in 10 CFR 20 applicable to technical specification high radiation areas (>1 rem per hour) that results in the loss of radiological control over access or work activities within the respective high-radiation area (>1 rem per hour). For high radiation areas (>1 rem per hour), this PI does not include nonconformance with licensee-initiated controls that are beyond what is required by technical specifications and the comparable provisions in 10 CFR Part 20.

A footnote states that “Concurrent” means that the nonconformances occur as a result of the same cause and in a common timeframe.

Event or circumstances requiring guidance interpretation

On June 2, 2012, an equipment failure resulted in resin/water slurry flow into the general area hallway of the Radwaste Building EI. 574. Indications of changing radiological conditions were available. However, the Radiation Protection staff did not recognize the need to conduct a new radiological survey of the area, which was posted and controlled as a High Radiation Area (HRA) at the time. The failure to perform a timely radiological survey is a performance deficiency and an NRC Performance Indicator occurrence.

Over the next few days, there were two instances of individuals entering this area without Radiation Protection coverage and one instance where an individual was provided a HRA key but did not enter the area.

Enclosure 2

On June 7, 2012, a Radiation Protection technician performed a radiological survey of the area in preparation for decontamination activities. The survey identified a floor area where dose rates met the Technical Specification criteria for classification as a Locked High Radiation Area (LHRA). After the survey, the Radwaste Building El. 574 area was posted and controlled as a LHRA.

This PI counts nonconformances, or “concurrent nonconformances,” with technical specifications. “Concurrent nonconformances” are defined as those that “occur as a result of the same cause and in a common timeframe.” In this case, the three instances were as a result of the same cause – the failure of Radiation Protection personnel to recognize the need to perform a new radiological survey. “Common timeframe” is not defined; however FENOC believes that these three instances meet the intent of a “common timeframe.” The instances were a result of a single performance deficiency with the same common cause.

The failure to recognize the need to perform a new radiological survey prior to June 7, 2012, was reported as a PI occurrence. Additionally, the three instances of individuals entering the area, or having access without Radiation Protection coverage as a result of the single performance deficiency of not performing the timely survey were conservatively reported pending the outcome of this FAQ.

Since the PI counts nonconformances that “result in the loss of radiological control over access or work activities” and the nonconformance that led to the three entries was the failure of Radiation Protection to recognize the need to perform a new radiological survey, are the two subsequent entries and one potential entry considered to be “concurrent nonconformances” bounded by the failure to recognize the need to perform the new radiological survey?

What is the NRC resident inspector’s position?

The NRC resident inspector agreed with the facts and recommended that the FAQ process be followed for resolution.

Potentially relevant existing FAQ numbers

FAQ 203 addresses the footnote in question. However, in FAQ 203, the causes of the two entries were different; therefore, both occurrences counted. FAQ 203 did not address “common timeframe.”

Response Section

Proposed Resolution of FAQ

The failure to recognize the need to perform a new radiological survey represents a loss of control over access into a LHRA. However, since the subsequent three instances without Radiation Protection control were a result of the failure to perform the new radiological survey, and were within a limited common timeframe, they can be considered to be “concurrent nonconformances.” Only one Technical Specification High Radiation Area PI occurrence should be reported.

If appropriate, provide proposed rewording of guidance for inclusion in next revision.

In the footnote defining “concurrent,” “common timeframe” should be defined to be “within the normal period of time between surveys for the specific area.”