



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
245 PEACHTREE CENTER AVENUE NE, SUITE 1200  
ATLANTA, GEORGIA 30303-1257

September 14, 2012

Mr. Joseph W. Shea  
Manager, Corp. Nuclear Licensing Programs  
Tennessee Valley Authority  
1101 Market Street, LP 4B-C  
Chattanooga, TN 37402-2801

**SUBJECT: NOTIFICATION OF INSPECTION AND REQUEST FOR INFORMATION –  
SEQUOYAH NUCLEAR PLANT**

Dear Mr. Shea:

On October 22-26, 2012, and November 5-9, 2012, the NRC will perform a baseline Radiation Safety Inspection at Sequoyah Nuclear Plant, (NRC Inspection Procedures 71124.01, 71124.02, 71124.03, 71124.04, 71124.05, and Radiation Safety Sections of 71151).

Experience has shown that this inspection is resource intensive for both the NRC inspectors and your staff. In order to minimize the impact to your on-site resources and to ensure a productive inspection, we have enclosed a request for documents needed for this activity. It is important that all of these documents are up to date and complete, thereby minimizing the number of additional documents requested during the preparation and/or the onsite portions of the inspection. The inspector has requested that the subject informational material be provided in CD or DVD format on or before October 8, 2012.

We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Mr. Rusty Proffitt of your organization. If there are any questions about this inspection or the material requested, please contact the lead inspector, Ruben Hamilton, at (404) 997-4672, or the Plant Support Branch 1 Chief, Brian Bonser, at (404) 997-4653.

“This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control numbers 3150-0044, 3150-0014, 3150-0011, and 3150-0008. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.”

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Sincerely,

*/RA/*

Brian R. Bonser, Chief  
Plant Support Branch 1  
Division of Reactor Safety

Docket No. 50-327, 50-328  
License No. DPR-77, DPR-79

Enclosure:  
Document Request List

cc w/encl: (See page 3)

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**/RA/**

Brian R. Bonser, Chief  
 Plant Support Branch 1  
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 License No. DPR-77, DPR-79

Enclosure:  
 Document Request List

cc w/encl: (See page 3)

Distribution w/encl:  
 C. Evans, RII EICS (Part 72 Only)  
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ADAMS: X Yes      ACCESSION NUMBER: **ML12264A033**      X SUNSI REVIEW COMPLETE X FORM 665 ATTACHED

OFFICE	RII: DRS/PSB1	RII: DRS/PSB1				
SIGNATURE	RA/RH	RA/BB				
NAME	R.HAMILTON	B. BONSER				
DATE	09/14/2012	09/14/2012				
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DRS\I\PSB1\INFORMATION REQUEST LETTERS\SEQUOYAH\SEQUOYAH 201205\_RP\_RFI LETTER FOR 10-2012 REV1.DOCX

cc w/encl:  
J. T. Carlin  
Site Vice President  
Sequoyah Nuclear Plant  
Tennessee Valley Authority  
Electronic Mail Distribution

P. R. Simmons  
Plant Manager  
Sequoyah Nuclear Plant  
Tennessee Valley Authority  
Electronic Mail Distribution

G. M. Cook  
Manager  
Licensing  
Sequoyah Nuclear Plant  
Electronic Mail Distribution

C. D. Mackaman  
Tennessee Valley Authority  
Electronic Mail Distribution

Edward J. Vigluicci  
Assistant General Counsel  
Tennessee Valley Authority  
Electronic Mail Distribution

County Mayor  
Hamilton County  
Hamilton County Courthouse  
208 Courthouse  
625 Georgia Avenue  
Chattanooga, TN 37402-2801

Tennessee Department of Environment & Conservation  
Division of Radiological Health  
401 Church Street  
Nashville, TN 37243

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
Sequoyah Nuclear Plant  
2600 Igou Ferry Road  
Soddy Daisy, TN 37379-3624

Ann Harris  
341 Swing Loop  
Rockwood, TN 37854

## Pre-Inspection Document Request

Occupational Radiation Safety Cornerstone

Licensee: Sequoyah Nuclear Plant

Docket Number(s): 50-327, 50-328

Inspection Dates: October 22-26, 2012, and November 5-9, 2012

Inspection Procedures: 71124.01 Radiological Hazard Assessment and Exposure Controls  
71124.02 Occupational ALARA Planning and Controls  
71124.03 In-Plant Airborne Radioactivity Control and Mitigation  
71124.04 Occupational Dose Assessment  
71124.05 Radiation Monitoring Instrumentation  
71151 Performance Indicator Verification

**Note:** Unless specified otherwise, the current version of these documents is expected. Electronic media is preferred if readily available (The preferred file format is MSWord, or searchable “.pdf” files on CDROM). *Note that the inspectors cannot accept data provided on USB or “flash” drives due to NRC IT security policies.* To the extent possible, please organize the information in the order shown below. Experience has shown that a poorly organized CD leads to a less efficient inspection and places additional burden on licensee staff. If there are questions regarding the documents requested, please do not hesitate to contact the lead inspector.

Documentation for the inspection procedures from October 18, 2010, to the present is requested, unless otherwise identified. We would prefer as much of the information as possible in electronic form, preferably either a CD or DVD. An index to the CD contents is also helpful. For those items requesting a list of documents/areas, the inspector will select documents/areas from the list for on-site review.

If you have any questions, please call Ruben Hamilton at (404) 997-4672. Thank you in advance for all of your effort in putting together this material.

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### Assistance Requested During On-Site Inspection

- Identification of work activities available during the inspection for inspector observations, including notification of pre-job briefings, notification of diving activities, audio/visual surveillance for remote job coverage
- Health physics assistance in plant walk-downs assessing access controls, e.g. verifying the posting and locking of entrances to high and very high radiation areas (HRA and VHRA), and SFP controls
- Health physics assistance in plant walk-downs/job coverage of ongoing activities to assess access controls
- Discussions with appropriate individuals regarding access controls

Enclosure

### General Information Request

- Plant Management, Radiation Protection, and Chemistry organizational charts w/ contact numbers
- Telephone numbers and name(s) of site contact(s) for each Inspection Procedure
- List of active radiation work permits with their administrative limits, electronic dosimeter dose rate limit, and dose limit
- Electronic copy of relevant UFSAR chapters (e.g., access controls, and radiation protection program)
- List of radiation protection procedures that includes title and number
- Outage schedule, including work activities to be conducted during the week(s) of the inspection
- Most recent DAW 10 CFR Part 61 analytical results
- Corrective Action Program procedures
- Procedure(s) for identifying, notification, tracking, and correcting PI occurrences
- List of all Performance Indicators (PIs) and copies of associated corrective action reports for Occupational Exposure Control Effectiveness and RETS/ODCM Radiological Effluent Occurrences
- Audits and self-assessments performed since October 18, 2010, that encompass the areas of (1) the ALARA program and implementation, (2) respiratory protection, and (3) airborne radioactivity, monitoring and/or mitigation-engineering controls

### 71124.01 - Radiological Hazard Assessment and Exposure Controls

1. List of active Radiation Work Permits (RWPs), including outage RWPs.
2. Most recent survey of all Locked HRAs and VHRAs (as applicable).
3. Most recent survey of Independent Spent Fuel Storage Installation (ISFSI) areas.
4. Procedures related to HP controls (e.g. Posting, labeling, surveys, RWPs, contamination control, HRA/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, etc.).
5. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow up, etc.).
6. List of Nationally Tracked Sources and any change-of-ownership transactions.
7. List of all non-fuel items stored in spent fuel pool.
8. All self-assessments and audits covering HP controls since October 18, 2010.
9. LIST of CRs related to HP controls where the cause was listed as human performance (radworker error) or human performance (HP technician error) issued since January 2011. *This should be a list of corrective action documents containing an CR number and brief description, not full CRs.*
10. All CRs related to Nationally Tracked Sources since October 18, 2010.

### 71124.02 - ALARA Planning and Controls

1. Site and corporate procedures associated with maintaining site dose ALARA, including those involving ALARA work activities. These procedures should include:
  - ALARA program implementation, including ALARA committee activities and ALARA planning, briefing, and reviews
  - Radiation work permit preparation and worker compliance
  - Processes used to estimate and track work activity specific exposures
  - Making changes to dose estimates during task performance
  - Work controls
  - Engineering controls

- Exposure mitigation requirements
2. Most recent annual ALARA report and most recent refueling outage report.
  3. Annual ALARA goals for 2010, 2011, and 2012, and the methodology utilized to make the projections.
  4. Historic trends and the current status/characterization of plant source term.
  5. ALARA Committee activity summaries (e.g. meeting minutes) for three months or 3 meetings prior to, and after the last refueling outage.
  6. ALARA Committee activity summaries (e.g. meeting minutes) discussing activities associated with the upcoming refueling outage.
  7. Completed ALARA packages (including post-job reviews) for the five work activities that were completed during the last outage which had the greatest collective dose and/or presented significant radiological risk.
  8. List of five activities (including ALARA package number) from the previous outage in which the work scope changed or was extended and alternative ALARA measures were taken to respond to the emergent conditions.
  9. List of five activities from the previous outage in which the estimated work hours were significantly different than the actual hours expended. List five activities in which the estimated and actual hours expended were accurate.
  10. Outline of the source term reduction strategy. Information should include:
    - Historic trends and current status of plant source term
    - Factors that affect the source term
    - Activities employed to reduce the source term
    - Specific sources identified for reduction actions
    - Source term reduction evaluation
    - Results achieved since October 18, 2010
  11. List of activities since October 18, 2010, that were reviewed for ALARA problems and actions taken to prevent recurrence. Include corrective action report number(s) if applicable.
  12. List of corrective action reports generated since October 18, 2010, related to the ALARA program, including the following:
    - ALARA planning
    - Post-job review identified problems
    - Radiation worker practices
    - Occurrences where the collective exposure was greater than intended dose determined to be ALARA for the individual work activities

13. Available for onsite review during the inspection: (Please do not provide any records which contain personally identifiable information such as social security number and name on the CD)

- ALARA planning packages for jobs performed during the outage
- Temporary shielding requests generated for the outage
- Records of personnel monitored for radiation exposure that show the total TEDE to date for each person. If possible, sort individuals by work group

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

1. Site and corporate procedures/manuals associated with airborne radiation monitoring instrumentation and respiratory protection. Procedures/manuals should include:
  - Operation, calibration, and maintenance of air sampling instrumentation, including set-point determination (e.g., low-vols, high vols, goosenecks, AMS 4s, etc.)
  - Calibration and maintenance of portable instruments
  - Actions to be taken when air sampling instrumentation is found to be significantly out of tolerance/calibration
  - Issuance and use of respiratory protective equipment (emphasis on SCBA and air-supplied equipment)
  - Training, including fit-testing, for use of SCBA and supplied-air systems
  - SCBA maintenance activities, including vital components (i.e. regulators)
  - Determination/verification of Grade D air for SCBA
2. Two most recent calibrations for the following Continuous Air Monitoring (CAM) equipment:
  - Control Room Ventilation
  - Spent Fuel Pool
  - Radioactive Waste Processing
3. Records of certification of air quality for equipment used to provide breathing air for air-supplied respirators and SCBA bottles since October 18, 2010.
4. List of corrective action reports generated since October 18, 2010 involving radiation monitoring and protective equipment deficiencies, including the following:
  - Continuous air monitors
  - Respiratory protection equipment and program implementation
5. Available for onsite review by inspector during inspection:
  - Inventory, inspection, and maintenance records for SCBA equipment
  - Training records, including fit-testing, for SCBA-qualified individuals
  - Training records/certification for individuals qualified to perform maintenance on vital components (e.g. regulators) on SCBA

71124.04: Occupational Dose Assessment

1. Provide Procedures/Guidance Documents for external dose monitoring, i.e. dosimetry issuance and use. The documents should include:



- Guidance for multi-badging; monitoring in steep/highly variable dose rate gradients
  - Personnel contamination events; storage/care of personal dosimeters; use of electronic dosimeters including evaluation of any biases identified relative to TLD monitoring
  - Internal dose assessment, i.e., both *in vivo* and *in vitro* bioassay and air sampling capabilities. The documents should include guidance for calibration/QC and use of whole body counter (WBC); release of contaminated individuals, use of passive monitoring as screening method for evaluations, and special *in vitro* sample collection and analysis, and actions for declared pregnant workers
2. NVLAP accreditation documentation for current dosimetry used by the site.
  3. List of all positive whole body count (WBC), *in vitro*, or air sampling analyses which resulted in an assigned CEDE equal to or exceeding 10 millirem since June 1, 2011. *[Note: only a listing should be provided for use by the inspectors to select a sample of issues for in-depth review during the onsite inspection].*
  4. List of all personnel contamination events, dispersed contamination/discrete particles, identified since June 1, 2011. *[Note: only a listing should be provided for use by the inspectors to select a sample of issues for in-depth review during the onsite inspection].*
  5. Copies of all audits, self-assessments, and/or reviews related to internal or external dosimetry issues generated since June 1, 2011. The documents provided should include any reviews/evaluations conducted of vendor facilities, e.g., corporate or outside vendor/ or corporate calibration facilities.
  6. Provide a list of Condition Report (CR) documents generated since June 1, 2011, for Internal or external dosimetry issues/events. *[Note: only titles and a summary statement should be provided for use by the inspectors to select a sample of issues for in-depth review].*

#### 71124.05 - Radiation Monitoring Instrumentation

1. Procedures/Guidance Documents for:
  - use of portable instrument calibrators (e.g. Shepherd calibrator)
  - calibration and functional test/source checks of portable radiation detection instrumentation
  - calibration and functional tests of small article monitor (SAM), personnel contamination monitor (PCM), portal monitor (PM), whole body counting (WBC) equipment; and continuous air monitors (CAMs)
  - determination of set-points for Area Radiation Monitor (ARM), CAM, PCM, PM and SAM equipment
  - collection and analysis of high-range, post accident effluent samples
  - QA program for count room instruments (e.g. laboratory inter-comparison data)
2. The last 2 calibration records for the following monitors:
  - 0-RE-90-118, Waste gas effluent monitor
  - 0-RE-90-101B, Auxiliary Building Vent
  - 0-RE-90-122, Liquid Waste Disposal

0-RE-90-212, Station Sump Discharge Monitor  
 1-RE-90-99, Condenser Exhaust Radiation Monitor  
 1-RE-90-106 A, Upper Containment Particulate  
 1-RE-90-112 B, Lower Containment Noble Gas  
 1-RE-90-273, Lower Containment High Range

3. Certificates for the sources used to calibrate the above requested monitors showing traceability to a national standard (NIST), as applicable.
4. The last 2 calibration records of the portable instrument calibrator (Shepherd validation testing).
5. List of any Emergency Action Level (EAL) value associated with installed or portable radiation monitoring instrument indication(s).
6. Copies of all audits, self-assessments, and/or reviews of area and personnel monitoring equipment and portable radiation survey instruments generated since June 1, 2011. The records should include any reviews conducted of vendor facilities, e.g., outside calibration laboratories, as applicable.

List of CRs generated since June 1, 2011, related to portable instruments, effluent and area monitors, CAMs, RCA release point monitors, WBCs, and count room instruments. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

#### 71151 – Performance Indicator (PI) Verification

1. Monthly PI reports since June 1, 2011, and copies of associated condition reports for any RETS/ODCM Radiological Effluent occurrences.
2. Liquid and gaseous effluent release permits which specify the monthly, quarterly, and annual curies released by isotope and associated public dose assessments since June 1, 2011.
3. List of all corrective action documents since June 1, 2011, using keywords such as: HRA, LHRA, VHRA, unintended dose, unlocked door, etc.
4. List of all electronic dosimeter (ED) dose rate alarms > 1 R/hr and all ED dose alarms since June 1, 2011.

#### Inspector Contact Information:

Ruben Hamilton  
 (404) 997-4672  
[ruben.hamilton@nrc.gov](mailto:ruben.hamilton@nrc.gov)

#### Mailing Address

US Nuclear Regulatory Commission, Region II  
 ATTN: Ruben Hamilton  
 245 Peachtree Center Ave., NE  
 Suite 1200  
 Atlanta, GA 30303