Kellner, Robert

From: Kellner, Robert
Sent: Monday, July 03, 2017 6:40 AM
To: Julie Collier (jacollie@southernco.com)
Cc: 'rgsurber@southernco.com'
Subject: Farley 2017003 Radiation Safety Inspection Document Request
Attachments: FAR 2017003 RP Document Request.pdf

Julie,

Per my previous email, attached is the Initial Information Request for the NRC Radiation Safety Inspection scheduled for the week of August 21 - 25, 2017 at Farley Nuclear Plant.

Please let me know that you received this request. If there are any questions about this inspection, or the material requested, please contact me via email, or at the phone number or address included below.

Regards,

Bob

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Farley Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2017003

During the week of August 21 – August 25, 2017, the NRC will perform a baseline Radiation Safety Inspection at the Farley Nuclear Plant (NRC Inspection Procedures 71124.06, 71124.07, 71124.08, and 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 onsite resources and to ensure a productive inspection, we are requesting in advance 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 NRC requests that these documents be provided to the inspectors no later than August 4, 2017.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner at 404-997-4508, or the Plant Support Branch 1 Chief, Brian Bonser at 404-997-4653.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public inspections, exemptions, requests for withholding," a copy of this document will be available electronically for public inspection in the NRC Public Document Room, or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS); accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

PAPERWORK REDUCTION ACT STATEMENT

This document 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 3150-0008, 3150-0011, 3150-0014, 3150-0044, and 3150-0135.

PUBLIC PROTECTION NOTIFICATION

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.

Document Request List

Licensee:	**Farley Nuclear Plant, Units 1 & 2**
Docket Number:	05000348, 364
Inspection Dates:	August 21 - 25, 2017
Documents Due to Region II by:	**August 4, 2017**

Inspection Procedures:	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment
	IP 71124.07	Radiological Environmental Monitoring Program
	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation
	IP 71151	Performance Indicator Verification

Lead Inspector: Robert Kellner
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Note: The current version of these documents is expected unless specified otherwise. Electronic media is preferred if readily available. [*Note that the inspectors cannot accept data provided on USB or "flash" drives due to NRC IT security policies*.] Please organize the information as it is arranged below to the extent possible. During the inspection, the inspectors may request additional documents. If there are questions regarding the documents requested, or if the documents cannot be provided by the due date, please do not hesitate to contact the lead inspector.

Documentation for these inspection procedures, are requested from July 2015 to present, unless otherwise specified. We would prefer as much of the information as possible in electronic form. An index of 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.

Miscellaneous

- Listing of primary site contact(s) for each inspection area including name(s) and telephone numbers
- List of radiation protection procedures, including title and number
- Corrective Action Program (CAP) procedures
- Schedule of routine or special effluent/REMP sampling activities to be completed during the week of the inspection (Gantt chart if available).

71124.06 - Radioactive Gaseous and Liquid Effluent Treatment
(Last Inspected July 2015)

1. Site and/or corporate procedures associated with implementing the effluents and the groundwater monitoring program. Procedures should include those that address:
   a. Effluent sampling
   b. Effluent monitor set-point determinations

c. Dose calculations
d. Groundwater monitoring and reporting of spills/leaks
e. Methodology for determining effluent stack/vent flow rates

2. Offsite Dose Calculation Manual (ODCM) and a list of changes made in the last revision.
3. List of liquid and gaseous effluent monitors listed as out-of-service (OOS) for > 1 day since July 1, 2015, including any special reports submitted to the NRC as a result of effluent monitor operability.
4. List of all unmonitored spills, leaks, or unexpected liquid/gaseous discharges since July 1, 2015. If applicable, provide the Licensee Event Report (LER), event report, and/or special report.
5. List of non-radioactive systems that have become contaminated and any 10 CFR 50.59 evaluations performed, since July 1, 2015.
6. List of any changes to the effluent release points or effluent treatment systems, and associated 10 CFR 50.59 documentation since July 1, 2015.
7. Material condition surveillance records for effluent system components not readily accessible, including those inaccessible due to radiological conditions.
8. Effluent release permits for continuous gaseous, batch gaseous, continuous liquid, and/or batch liquid releases. Only provide permits for the most recent releases within each category.
9. Results of on-site counting lab inter-laboratory comparison program since July 1, 2015.
10. Results of the last two surveillances/tests of Unit 2 Penetration Room Filtration System (e.g., system flow, HEPA, charcoal filter tests).
11. The last two calibration records for the following effluent monitors:
    - Unit 2 R-14, Plant Vent Gas Monitor (Plant Vent)
    - R-21/R-22, Plant Vent Air Particulate and Vent Gas Monitors
    - Unit 1/2 R-18, Waste Processing System Liquid Effluent Monitor (Liquid waste disposal)
    - Unit 1 R-15, R15B, R15C, Condenser Air Ejector Gas Monitors (Normal, Intermediate, and High range)
12. The last two calibrations of the Plant Vent flow monitoring instrumentation
13. Groundwater monitoring results since July 1, 2015.
14. List of changes to the written groundwater monitoring program for identifying/controlling contaminated spills/leaks since July 1, 2015.
15. List of onsite surface water bodies (e.g., ponds, retention basins, lakes) that contain or potentially contain radioactivity.
16. List of Corrective Action Program (CAP) documents (CRs, NCRs, PIPs, etc.) generated since July 1, 2015, related to liquid and gaseous effluent treatment and monitoring, unmonitored spills, leaks, or effluent discharges, or the groundwater monitoring program. *This should be a list of corrective action documents containing an (AR, CR, NCR, etc.) number and brief description, not full documents.*
17. Audit and self-assessment documents generated since July 1, 2015, related to liquid and gaseous effluent treatment and monitoring, unmonitored spills, leaks, or effluent discharges, or the groundwater monitoring program.

71124.07 - Radiological Environmental Monitoring Program
(Last Inspected July 2015)

1. Collection schedule for Radiological Environmental Monitoring Program (REMP) samples during the week of inspection.

2. Site and corporate procedures associated with radiological environmental monitoring, including:
   a. Collection, preparation, and analysis of environmental samples including air, Thermoluminescent Dosimeter (TLD) stations, ground and surface water, sediment, vegetation, milk, fish, etc.
   b. Calibration and maintenance of air and water sampling equipment.
   c. Calibration and quality control (QC) activities for sample counting instruments.
   d. Sampling and monitoring program to detect leaks from contaminated, or potentially contaminated, systems, structures, or components (SSCs).
   e. Calibration, operation, maintenance, and routine surveillances of meteorological monitoring instruments (wind speed & direction, air temperature, etc.).
3. List of SSCs that contain, or could contain, licensed material for which there is a credible mechanism for the radioactive material (RAM) to reach ground water.
4. Summary of leaks and/or spills since July 1, 2015, (i.e. additions to the 10 CFR 50.75(g) file).
5. List of changes to the REMP (sample locations, sample frequency, type of samples, etc.) since July 1, 2015.
6. Calibration and maintenance records for REMP air and composite water samplers since July 1, 2015.
7. Inter-laboratory comparison program results since July 1, 2015, (in-house and vendor laboratory).
8. Last two calibration/surveillance/maintenance records for the meteorological monitoring instruments since July 1, 2015, (wind speed, wind direction, and air temperature).
9. Results of TLD environmental monitoring since the last inspection.
10. Audit and self-assessment documents generated since July 1, 2015, related to REMP. The data should include any reviews conducted of vendor activities and their facilities (e.g., environmental lab).
11. List of CAP documents (CRs, NCRs, PIPs, etc.) generated since July 1, 2015, related to REMP. The data should include any reviews conducted of vendor activities and their facilities (e.g., environmental lab). *This should be a list of corrective action documents containing an (AR, CR, NCR, etc.) number and brief description, not full documents.*

71124.08 - Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation

(Last Inspected July 2015)

1. Provide Procedures/Guidance Documents describing licensee compliance with 10 CFR Parts 20, 61, and 71, and 49 CFR Parts 170-189. Procedures/manuals should include:
   a. Solid and liquid radwaste processing procedures.
   b. Procedure(s) for transferring radioactive waste resin and sludge discharges into shipping/disposal containers.
   c. Waste stream mixing and/or sampling procedures, including:
      i. waste concentration averaging;
      ii. use of scaling factors and calculations used to account for difficult-to-measure radionuclides;
      iii. ensuring waste stream composition data accounts for changing operational parameters.
   d. Shipping/transportation procedures.
   e. Cask loading and closure procedures (licensee and vendor) applicable to last three cask transports.
2. Provide a list of RAM storage areas, including satellite radiological controlled areas

(RCAs)

3. Provide Liquid and solid radwaste system diagrams and detailed system descriptions (e.g., information that might be contained in curricula for training new system engineers)
4. Provide the most recent radio-chemical sample analysis results (i.e., “10 CFR Part 61" analysis) for each of the radioactive waste streams (e.g., dry active waste (DAW), ion exchange resins, mechanical filters, and sludges and activated materials).
5. List and documentation of any changes made to the radioactive waste processing systems (liquid and solid) and/or the Process Control Program (PCP) since the July 1, 2015, and associated 10 CFR 50.59 documentation, as appropriate.
6. Provide a log of RAM shipments (LSA I, II, IIII; SCO I, II, Type A, or Type B) since July 1, 2015. (The inspectors will select three to five packages to review in detail.)
7. List of CAP documents (CRs, NCRs, PIPs, etc.) involving radioactive waste and RAM processing and/or transportation (e.g., keyword searches for RAM, shipping, radwaste, 10 Part 61, etc.) issued since July 1, 2015. *This should be a list of corrective action documents containing an (AR, CR, NCR, etc.) number and brief description, not full documents.*
8. Available for onsite review during the inspection:
    a. Site drawing(s) showing the location of all stored RAM and all stored radioactive waste.
    b. Plant drawings sufficient to permit the inspector to walkdown the liquid and solid radioactive waste processing systems, to verify current system configuration/ operation agree with the descriptions contained in the Updated Final Safety Analysis Report and in the PCP.
    c. Documentation describing the status of any radioactive waste process equipment that is not operational and/or is abandoned in place.
    d. Information concerning the site’s waste disposal volume and waste reduction program.
    e. Training and qualification records for personnel responsible for radioactive waste.
    f. Training curriculum and primary lesson plans for qualifying persons, including vendors, for radwaste processing, packaging, and making shipments of RAM and radioactive waste as specified by 49 CFR Part 172.

71151 – Performance Indicator Verification
(Last inspected October 2016)

1. Procedures for gathering and reporting NRC Performance Indicator (PI) data, including any applicable “desktop guides”.
2. Monthly/Quarterly Performance Indicator (PI) reports and copies of associated CAP documents, for Occupational Exposure Control Effectiveness and Radiological Effluent Technical Specifications/ Offsite Dose Calculation Manual (RETS/ODCM) Radiological Effluent Occurrences since September 1, 2016.
3. Most recent gaseous effluent release permits and liquid effluent release permits, which specify the quarterly and annual curies released by isotope and associated public dose assessment.
4. List of all electronic dosimeter (ED) dose alarms and all ED dose rate alarms since September 1, 2016.
5. List of all CAP documents (CRs, NCRs, PIPs, etc.) since September 1, 2016 using keywords such as high radiation area (HRA), locked high radiation area (LHRA), very high radiation area (VHRA), unintended dose, unlocked LHRA door, etc.
6. List of CAP documents (CRs, NCRs, PIPs, etc.) since September 1, 2016, using keywords such as abnormal unmonitored effluent release, etc.

7. Audit and self-assessment documents generated since September 1, 2016, related to PIs.

Assistance Requested During On-Site Inspection

- Notification of any routine or special effluent/REMP sampling activities to be completed during the inspection
- Health physics assistance coordinating walkdowns of the meteorological tower, and waste processing systems.

Inspector Contact Information:

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