

Kellner, Robert

From: Kellner, Robert
Sent: Thursday, April 05, 2018 7:33 AM
To: Caudell, Christine Anna
Cc: Rivera, Jonathan
Subject: Robinson June 2018 NRC Radiation Safety Inspection - Initial Document Request
Attachments: HB Robinson 2018002 NRC Rad Safety Initial Document Request.pdf

Christine,

Per our previous emails, you will be the licensing point of contact for the upcoming NRC Radiation Safety Inspection scheduled for the week of June 11-15, 2018 at the HB Robinson Nuclear Plant. Attached is the Initial Document Request List.

The NRC inspectors that will be on-site during the inspection are myself, and Jonathan Rivera. I should be up to date on my Duke access training since you already sent me the training package. You will have to check with Jonathan on his Duke access training.

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

H.B. Robinson Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2018002

During the week of June 11-15, 2018, the Nuclear Regulatory Commission (NRC) will perform a baseline Radiation Safety Inspection at H.B. Robinson Nuclear Plant, (NRC Inspection Procedures 71124.03 (partial), 71124.04, 71124.05, and the Public Radiation Safety Section 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 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 provided to the inspectors in CD/DVD format no later than May 30, 2018.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner, at robert.kellner@nrc.gov or (404) 997-4508, or the Engineering Branch 3 Branch 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," of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, and its Enclosure, 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> (the Public Electronic Reading Room).

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: H.B. Robinson Nuclear Plant

Docket Number(s): 05000261

Inspection Dates: June 11-15, 2018

Documents Due to R-II by: **May 30, 2018**

Inspection Procedures (IPs):

71124.03	In-Plant Airborne Radioactivity Control and Mitigation
71124.04	Occupational Dose Assessment
71124.05	Radiation Monitoring Instrumentation
71151	Performance Indicator Verification

Lead Inspector: Robert Kellner
Senior Health Physicist
US NRC Region II
(404) 997-4714
robert.kellner@nrc.gov

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. Experience has shown that a poorly organized CD leads to a less efficient inspection and places additional burden on licensee staff. Pay particular attention to the date ranges for the items requested as they may change from item to item. 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 the inspection procedures from June 1, 2017 to the present is requested for all procedures. This reflects the last time these areas were inspected. We would prefer as much of the information as possible in electronic form. 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.

General and Miscellaneous Information

- List of primary site contact(s) for each inspection area including name(s) and telephone numbers.
- List of radiation protection procedures, including title and number.
- Plant Management, Radiation Protection, and Chemistry organizational charts w/ contact numbers
- Most recent DAW 10 CFR Part 61 analytical results and characterization of major radioactive waste streams (e.g. Dry Active Waste (DAW), filters, primary resin, etc.)
- Corrective Action Program procedure(s)
- List of all Performance Indicators (PIs) and copies of associated corrective action reports for Occupational Exposure Control Effectiveness and RETS/ODCM Radiological Effluent Occurrences since June 1, 2017.
- Audits and self-assessments performed since June 1, 2017 that encompass the areas of (1)

respiratory protection, (2) airborne radioactivity, monitoring and/or mitigation-engineering controls, and (3) radiological monitoring instrumentation (portable, installed, and counting room instruments).

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation (partial)

(Last inspected June 2017)

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.)
 - 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)
 - Total Effective Dose Equivalent-ALARA evaluation guidance
 - 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. Most recent site alpha characterization report.
3. Two most recent HEPA filter DOP and charcoal test results or the following ventilation systems:
 - Spent Fuel Storage Area Subsystem of the Fuel Handling Building Ventilation
 - Technical Support Center/Emergency Operations Facility Ventilation System
4. Records of air quality certification for equipment used to provide breathing air for air-supplied respirators and SCBA bottles (air compressors and bottled breathing air) since June 1, 2017.
5. Documentation for last two surveillances performed on SCBAs stored for emergency use.
6. List of corrective action reports generated since June 1, 2016 involving radiation monitoring and protective equipment deficiencies, including the following:
 - Continuous air monitors
 - Respiratory protection equipment and program implementation
7. 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
 - i. List of all licensed operators qualified to use SCBA
 - ii. List of all instrumentation and control personnel qualified to use SCBA
 - iii. List of all HP personnel qualified to use SCBA
 - Training records/certification for individuals qualified to perform maintenance on vital components (e.g. regulators) on SCBA

71124.04: Occupational Dose Assessment

(Last Inspected June 2017)

1. Site and corporate 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 dosimetry used by the site for the current.
3. ISFSI perimeter area monitoring results (TLD data) since June 1, 2017.
4. 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, 2017. [*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. List of all personnel contamination events, dispersed contamination/discrete particles, identified since June 1, 2017. [*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*].
6. Copies of all audits, reviews, or evaluations conducted of vendor facilities, e.g., corporate or outside vendor or corporate facilities related to internal or external dosimetry issues generated since June 1, 2017.
7. List of Condition Reporting (CR) documents generated since June 1, 2017, 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

(Last Inspected June 2017)

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 two calibration records for the following monitors:
 - R-1 Control Room Area Radiation Monitor (ARM)
 - R-5 Spent Fuel Building ARM
 - R-32A/B Containment High-Range Radiation Monitors (CHRRMS)
 - R-24A/B/C Main Steam Line N-16 Monitors
 - R-31A/B/C Main Steam Line Radiation Gas Monitors
 - R-14D/R-14E Plant Vent Mid/High Range Radiation Monitors
3. Documentation for the radioactive sources used to calibrate the instruments in item 2 above, including paperwork showing traceability to a National Institute of Standards & Technology standard and/or traceability to the primary calibration, as applicable.
4. The last two surveillances performed on the Post-accident Sampling System, as applicable if it is still required in the plant technical specifications
5. The last two test records of the instrument calibrator (Shepherd validation testing/dose rate curves).
6. List of the portable instruments currently in service and available for use. Several will be selected for on-site review of the calibration records.

7. List of the following radiation monitors currently in service. Several will be selected for on-site review of the calibration records.
 - Portal Monitors used in Dosimetry for Passive Monitoring
 - SAMs at RCA exit point
 - Whole Body Contamination Monitors at RCA exit point
 - Portal Monitors at RCA exit point
 - Countroom High-purity Germanium and liquid scintillation systems
8. Documentation for the radioactive sources used to calibrate the monitors requested for item 7 above showing traceability to a national standard (NIST).
9. Chart or procedure listing any Emergency Action Level (EAL) value associated with installed or portable radiation monitoring instrument indication(s).
10. Latest system health report for the Radiation Monitoring system.
11. Copies of all audits, self-assessments, and/or reviews of vendor or corporate facilities, e.g., outside or corporate calibration laboratories, generated since June 1, 2017.
12. List of CRs generated since June 1, 2017, related to portable instruments, area monitors, CAMs, 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 (Public Cornerstone)

(Last Inspected June 2017)

1. Site procedures/manuals for gathering and reporting PI data.
2. Monthly/Quarterly PI reports since June 1, 2017, and copies of associated condition reports for any RETS/ODCM Radiological Effluent occurrences.
3. End of calendar year (CY) 2017 liquid and gaseous effluent release permits which specify the monthly, quarterly, and annual curies released by isotope, and associated public dose assessments.
4. List of all corrective action reports generated since June 1, 2017, using keywords abnormal/unmonitored effluent release, etc.

Assistance Requested During On-Site Inspection

- Assistance scheduling walkdowns of installed radiation monitors and ventilation systems.
- HP discussions/checks of emergency SCBAs and respiratory equipment.
- HP assistance in coordinating observations of instrument source checks and respirator fit testing.
- Assistance in coordinating observations of installed rad monitoring instrument calibrations, if available.

Inspector Contact Information:

Robert Kellner
(404) 997-4508
robert.kellner@nrc.gov

Mailing Address

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