

Robinson Nuclear Station
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2018003

During the week of September 24 – 28, 2018, the NRC will perform a baseline Radiation Safety Inspection at Robinson Nuclear Station (NRC Inspection Procedures 71124.01, 71124.02, 71124.03, and Occupational 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 be provided to the inspectors no later than **September 7, 2018**.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Wade Loo at 404-997-4727, 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/readingrm/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

Occupational Radiation Safety Cornerstone

Inspection Dates: September 24 - 28, 2018

Documents Due by: **September 7, 2018**

Licensee: Robinson Nuclear Station

Docket Number: 05000261

Inspection Procedures (IPs): 71124.01 - Radiological Hazard Assessment and Exposure Controls
71124.02 - Occupational ALARA Planning and Controls
71124.03 - In-Plant Airborne Radioactivity Control and Mitigation (Partial)
71151 - Performance Indicator Verification (Occupational Only)

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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 June 1, 2017, 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:

1. List of primary site contact(s) for each inspection area including names and telephone numbers.
2. List of radiation protection procedures, including title and number.
3. Plant Management, Radiation Protection, and Chemistry organizational charts w/contact numbers. Outage schedule, including work activities to be conducted during the weeks of the inspection.
4. Corrective Action Program procedure(s).
5. Audits and self-assessments performed since June 1, 2017, that encompass the areas of (1) HP controls and (2) the ALARA program and implementation.

Enclosure

71124.01 - Radiological Hazard Assessment and Exposure Controls:

1. List of active Radiation Work Permits (RWP), including planned and contingency outage RWPs, with their administrative limits, electronic dosimeter dose rate limit, and dose limit.
2. Timeline of major outage activities (e.g., Gantt chart or similar list).
3. Procedures related to health physics (HP) controls (e.g., Posting, labeling, surveys, RWPs, contamination control, high radiation area (HRA)/locked high radiation area (LHRA)/very high radiation area (VHRA) control, key control, control of divers, special controls during fuel offload, hot spots).
4. Procedures related to release of personnel and materials (e.g., release surveys, decontamination, guidance for alarm followup).
5. List of National Source Tracking System (NSTS) sources, change-of-ownership and copies of transactions since June 1, 2017.
6. Documentation of annual NSTS sources inventory reconciliation for 2017.
7. Most recent survey of all LHRAs and VHRAs, as applicable.
8. Most recent radioactive materials (RAM) sealed source inventory record.
9. List of all non-fuel items stored in spent fuel pool (SFP).
10. List of Corrective Action Program (CAP) documents related to HP controls where the cause was listed as human performance (e.g., radworker error, HP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems) issued since June 1, 2017. *[This should be a list of corrective action documents containing an Action Request (AR) or Condition Report (CR) numbers and brief description, not full Nonconformance Reports (NCRs).]*
11. All self-assessments and audits covering HP controls since June 1, 2017.
12. All CAP documents related to NSTS sources since June 1, 2017.

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. List of top five dose jobs for the upcoming refueling outage and ALARA planning packages (including dose estimates, work-hour estimates, special HP controls, and dose reduction initiatives).
3. Most recent annual ALARA report and most recent refueling outage report.
4. Annual ALARA goals for 2017 and 2018, and the methodology utilized to make the projections.
5. ALARA Committee activity summaries (e.g. meeting minutes) discussing and approval of activities associated with the upcoming refueling outage.
6. 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 June 1, 2017.
7. List of CAP documents (e.g. NCRs, CRs, etc.) generated since June 1, 2017, 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
- [This should be a list of corrective action documents containing an AR or CR numbers and brief description, not full NCRs.]*
8. Available for onsite review during the inspection:
- ALARA planning packages for jobs to be performed during the outage
 - Temporary shielding requests generated for the outage
 - Completed ALARA packages (including post-job reviews) for the five (5) work activities that were completed during the last outage that had the greatest collective dose, and/or presented significant radiological risk.

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.)
 - 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

71151 – Performance Indicator (PI) Verification

1. Site procedures/manuals for gathering and reporting PI data.
2. List of all corrective action documents since June 1, 2017, using keywords such as: HRA, LHRA, VHRA, unintended dose, unlocked door, etc. *[This should be a list of corrective action documents containing an AR or CR numbers and brief description, not full NCRs.]*
3. List of all electronic dosimeter (ED) dose rate alarms and ED dose alarms since June 1, 2017 which includes dose or dose rate alarm received, and the alarm setpoint(s).

Assistance Requested During Onsite 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.
- HP assistance in plant walkdowns assessing access controls (e.g., verifying the posting and locking of entrances to HRAs and VHRAs, and SFP controls).
- HP assistance in plant walkdowns/job coverage of ongoing activities to assess access

- controls.
- Discussions with appropriate individuals regarding access controls
 - Assistance with observations of ALARA committee meetings scheduled during the inspection weeks.

Inspector Contact Information:

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From: [Loo, Wade](#)
To: [Caudell, Christine Anna](#)
Cc: [Nielsen, Adam](#); [Kellner, Robert](#)
Subject: NRC Initial Information Request for Upcoming Radiation Protection Baseline Inspection
Date: Wednesday, June 20, 2018 2:02:00 PM
Attachments: [image001.png](#)
[Robinson Information Request Email EB3 RP 2018 003.pdf](#)

As discussed today, please find attached the Initial Information Request for the upcoming Radiation Safety Baseline Inspection scheduled for the week of September 24 - 28, 2018, at Robinson. As requested, please forward to the appropriate Radiation Protection and other staff who may have to gather this information for our upcoming inspection. Any questions regarding this please let me know. Thanks.

Wade T. Loo

Senior Health Physicist

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