ML 19024A411

From: Nielsen, Adam
Sent: Friday, January 18, 2019 2:43 PM
To: Bates, Richard Eric; Calkin, Baruch Judson
Subject: RP inspection document request 2019
Attachments: BF_2019-01_RP_doc_request.pdf

A document request for our upcoming RP baseline inspection is attached. We would like to have the documents to us by February 22, 2019. Please let me know if you have any questions.

Thanks,
Adam Nielsen, CHP
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US NRC Region II
(404) 997-4660

Browns Ferry Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2019001

During the weeks of March 4 – 8, and March 18 – 22, 2019, the NRC will perform a baseline Radiation Safety Inspection at the Browns Ferry Nuclear Plant (NRC Inspection Procedures 71124.01, 71124.02, 71124.03, 71124.04, 71124.05, 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 February 22, 2019.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Adam Nielsen at 404-997-4660, 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

Inspection Dates:	March 4 - 8 and March 18 – 22, 2019	
Documents Due to Region II by:	February 22, 2019	
Inspection Procedures:	IP 71124.01	Radiological Hazard Assessment and Exposure Controls
	IP 71124.02	Occupational ALARA Planning and Controls
	IP 71124.03	In-plant Airborne Radioactivity Control and Mitigation
	IP 71124.04	Occupational Dose Assessment
	IP 71124.05	Radiation Monitoring Instrumentation
	IP 71151	Performance Indicator Verification

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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. 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.

Miscellaneous

1. List of primary contacts for each inspection area w/phone numbers
2. Corrective action program procedure(s)

71124.01 - Radiological Hazard Assessment and Exposure Controls

1. Timeline of major outage activities (e.g. Gantt chart or similar list)
2. Procedures related to RP 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, ISFSI Controls, etc.)
3. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm followup, etc.)
4. List of Nationally Tracked Sources and any change-of-ownership transactions
5. Most recent sealed source inventory record
6. List of all non-fuel items stored in spent fuel pool
7. Last two surveys taken of the Independent Spent Fuel Storage Installation (ISFSI).
8. Most recent self-assessment or audit covering RP controls
9. List of CRs related to RP controls (e.g. radworker error, RP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.) issued since March 3, 2018. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs*.

71124.02 - Occupational ALARA Planning and Controls

1. All procedures related to ALARA (e.g. temporary shielding, ALARA planning, source term reduction, etc.)
2. List of top 5 dose jobs for the upcoming refueling outage and ALARA planning packages (including dose estimates, work hour estimates, special RP controls, and dose reduction initiatives), if available
3. ALARA trending point data for last two outages (last two for all 3 units)
4. Source term reduction strategic plan, if available
5. Minutes from the last 4 Plant ALARA Committee Meetings
6. Most recent self-assessment or audit of ALARA program.
7. List of CRs related to ALARA since April 1, 2017. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs*

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

1. Procedures related to airborne monitoring and control (e.g. use of purge systems, use of portable HEPA/charcoal units, temporary ventilation enclosures, use of CAMs, air sampling guidance, Alpha air sampling, etc.), as applicable
2. Procedures related to the use of respiratory protection devices, (e.g. SCBA, TEDE-ALARA guidance, PAPRs, storage, maintenance, training, QA, fit-testing, etc.)
3. The last 2 grade D air testing certificates for each supplied air system and SCBA filling station
4. SCBA qualification records
    b) List of all licensed operators qualified to use SCBA
    c) List of all RP personnel qualified to use SCBA
5. Documentation for last 2 surveillances performed on SCBA stored for emergency use
6. Most recent audit or self-assessment covering airborne controls and respiratory protection
7. List of CRs related to airborne monitoring and respiratory protection since April 1, 2017. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

71124.04 – Occupational Dose Assessment

1. Procedures related to occupational dose assessment (e.g. dosimetry issuance and use, unusual dosimetry occurrences, multi-badging/extremity dosimetry/badge relocation, Effective Dose Equivalent, personnel contamination events, storage/care of personal dosimeters, *in-vivo* and *in-vitro* internal dose assessment, skin dose assessment, QC for whole body counter, use of passive monitoring if applicable, declared pregnant workers)
2. NVLAP accreditation documentation for current dosimetry used by site
3. List of all positive whole body counts, in vitro, or air sampling analyses which resulted in a CEDE equal to or exceeding 10 millirem since April 1, 2017. *[Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection]*
4. List of all Level III personnel contamination events identified since April 1, 2017. *[Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection.]*
5. Most recent neutron characterization
6. Most recent alpha characterization
7. Last 18 months of area TLD results for general plant areas (not REMP TLDs)
8. Copies of current WBC libraries (e.g. routine, medical, investigative, etc.)
9. Most recent audit or self-assessment of the dosimetry program and/or the most recent audit of the lab that processes site dosimetry

10. List of CRs generated since April 1, 2017, for internal or external dosimetry issues/events. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

71124.05 - Radiation Monitoring Instrumentation

1. Procedures/Guidance Documents for:
    a) calibration and functional test/source checks of portable radiation detection instruments
    b) calibration and functional tests of small article monitor, personnel contamination monitor, portal monitor, whole body counting equipment, and continuous air monitors
    c) collection and analysis of high-range, post-accident effluent samples
    d) QA program for count room instruments
2. The last 2 calibration records for each of the following instruments:
    a) Unit 3 Drywell Radiation Monitors (3-RE-90-272A & 3-RE-90-273A)
    b) Unit 3 TIP Room Area Monitor (3-RE-90-22)
    c) Unit 3 Main Control Room Area Monitor (3-RE-90-8)
    d) U3 Rx Building Service floor ARM (3-RA-90-2)
3. Documentation for the radioactive sources used to calibrate the instruments in item 2 above.
4. Design documents and/or calculations showing how the alarm setpoints for the following instruments are determined:
    a) Unit 3 Drywell Radiation Monitors (3-RE-90-272A & 3-RE-90-273A)
    b) Continuous Air Monitors (e.g. AMS-4, mini-edgar, etc.)
5. Chart or procedure listing EALs associated with radiation monitors
6. The last 2 calibration records for each of the following instruments:
    a) Portal Monitors located at RCA exit
    b) Small Article Montiors located at RCA exit
    c) Whole body contamination monitors at RCA exit
    e) Whole Body Counter in dosimetry
7. Most recent test record of the instrument calibrator (Shepherd validation testing/dose rate curves)
8. Most recent audit or self-assessment covering RP instruments (portables, RCA exit point, WBC, count room). Include any reviews conducted of vendor facilities, as applicable.
9. LIST of CRs generated since April 1, 2017 related to portable instruments, 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 Verification (Occupational and Public Cornerstones)

1. Procedure(s) for gathering and reporting PI data
2. List of all CRs related to effluent dose/ODCM issues since June 23, 2018. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
3. LIST of all CRs related to LHRA/VHRA issues or significant (>100 mrem) unintended doses since March 3, 2018. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
4. Most recent gaseous and liquid effluent evaluation of dose to the public (year-to-date doses).
5. LIST of electronic dosimeter alarms since March 3, 2018 (dose and dose rate)