



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 4, 2019

MEMORANDUM TO: Kevin Hsueh, Chief  
Radiation Protection and Consequence Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: David Garmon, Health Physicist */RA/*  
Radiation Protection and Consequence Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF NUCLEAR REGULATORY COMMISSION  
PUBLIC MEETING ON FEBRUARY 28, 2019 TO DISCUSS ROP  
ENHANCEMENT-RELATED CHANGES TO THE RADIATION  
SAFETY CORNERSTONES

On February 28, 2019, NRC staff conducted a category 2 public meeting (ADAMS Accession No. ML19050A455) to discuss ROP Enhancement-related changes to the radiation safety cornerstones. Enclosure 1 contains the meeting attendance list

**Purpose**

Communicate the staff's preliminary recommendations with respect to enhancements to the Radiation Safety Cornerstones of the Reactor Oversight Process.

**Background**

The ROP remains a sound and effective framework for regulation of commercial nuclear facilities; however, NRC staff can make improvements to the program, in line with the Principles of Good Regulation, to achieve a more risk-informed and performance-based program. By letter dated September 19, 2018 (ADAMS Accession No. ML18262A322), the staff received two major recommendations from industry that apply to the Radiation Safety Cornerstones of the ROP:

- 1) "Review radiation protection inspections to apply lessons learned from the Engineering Inspections Working Group to streamline them (following the stakeholder engagement process employed with engineering inspections); include credit for self-assessments."

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- 2) "The philosophy setting the policy for the EP SDP above should be applied to all deterministic SDPs as much as practical."

NRC staff solicited external participation to inform its analysis of the recommendations. During a public meeting on November 15, 2018 (ADAMS Accession No. ML18348B256), the staff agreed to focus on four areas during the ROP Enhancement effort: (1) Oversight in the area of As Low as is Reasonably Achievable (ALARA) performance; (2) Oversight of Radiological Instrumentation; (3) Oversight of Radioactive Effluents; and (4) An increased reliance on licensee self-assessments as a means of assessing plant performance in the these areas. During a public meeting on December 14, 2018 (ADAMS Accession No. ML18345A396 and ML18352A984) industry representatives were provided with an opportunity to provide prepared remarks and information pertaining to industry performance in the focus-areas of this analysis.

### **Meeting Summary**

On February 28, 2019 (ADAMS Accession No. ML19060A128 and ML19046A069), the staff held a public meeting to discuss the preliminary conclusions of its analysis of the industry's recommendations. During the meeting, the staff reviewed fundamental information regarding the Radiation Safety Cornerstones; described its approach toward evaluating the industry's recommendations; provided perspectives on the application of self-assessments in the oversight of licensee radiation protection programs and presented its proposed recommendations to the Commission. The staff also solicited feedback from external stakeholders for inclusion in its SECY input.

### **Public Comments**

External stakeholders asked several clarifying questions regarding the draft recommendations.

Additionally, one member from the industry inquired about the status of the draft IMC 0609, Appendix D (ADAMS Accession No. ML18178A100) and if industry would be allowed to provide input on how industry comments to the draft would be resolved (ADAMS Accession No. ML18264A305). The staff placed the effort to update IMC 0609, Appendix D on hold while the ROP Enhancement effort was being initiated in case changes from the ROP Enhancement effort would have to be incorporated into IMC 0609, Appendix D. The staff intends to resume efforts to publish the updated IMC 0609, Appendix D in the spring of 2019. This effort will include a presentation during an ROP Monthly meeting where the staff will discuss how it resolved comments to the draft document. Details of the meeting will be included in the corresponding ROP Monthly meeting announcement.

Enclosure:  
Attendance List

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FEBRUARY 28, 2019 TO DISCUSS ROP ENHANCEMENT-RELATED CHANGES  
TO THE RADIATION SAFETY CORNERSTONES

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**ADAMS Accession Nos: ML19092A145 (\*email concurrence)**

<b>OFFICE</b>	NRR/DRA/ARCB	<u>NRR/DRA/ARCB</u>
<b>NAME</b>	DGarmon	<u>KHsueh</u>
<b>DATE</b>	4/2/19*	4/4/19*

**OFFICIAL RECORD COPY**

Meeting Attendance List:

Ellen Anderson	NEI
Mary Anderson	NRC
Rich Clement	NRC
Steven Dolley	S&P Global Platts
David Garmon	NRC
George Gellrich	Exelon
Heather Gepford	NRC
Russ Gibbs	NRC
Willie Harris	Exelon
Kevin Hsueh	NRC
Greg Ferrigno	South Texas Project
Ken Heffner	Certrec
Ben Hirner	Callaway
Elizabeth Langille	TVA
Jonah Morgan	South Texan Project
Jennifer Rowland	Millstone
Laura Schwartz	International Technology and Trade Associates Inc.
Daniel J. Shannon	Kewaunee
Jim Slider	NEI
Clayton Stone	South Texas Project
Steve Taylor	Southern Nuclear Co.
Samuel A. Wender	First Energy
Tony Zimmerman	Duke Energy

Enclosure