

Procedure for Evaluating & Documenting
Potential ALARA Mitigating Actions
for
Peach Bottom Atomic Power Station - Unit 2
Recirculation & RHR Piping Replacement Program

1.0 PURPOSE

This procedure implements an ALARA program at the Peach Bottom Atomic Power Station in accordance with the Referenced Regulatory Guide for the replacement of the Recirculation and Residual Heat Removal piping.

2.0 SCOPE

2.1 General Electric Company, Chicago Bridge and Iron and Philadelphia Electric Company shall utilize this procedure to evaluate and document potential mitigating actions to minimize the radiation exposure (ALARA) during the piping replacement program. ALARA must be considered in the development of engineering and construction for:

- o Reactor Vessel Set-Up
- o Drywell Set-Up
- o Drywell work required for the piping removal and replacement
- o Maintenance in Vessel and Drywell

3.0 REFERENCES

- 3.1 USNRC Regulatory Guide 8.8, Information Relevant to Ensuring that Occupational Radiation Exposure at Nuclear Power Station will be as low as is reasonably achievable (ALARA), Rev. 3, June 1978.
- 3.2 General Electric Company Specification 22A4159ZA Regulatory Guide Implementation Position- 8.8.
- 3.3 Philadelphia Electric Company, Peach Bottom Units 2 and 3, ALARA Program Administration Procedure, A-83.

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4.0 PROCEDURE

- 4.1 Responsible organization (GE or CB&I) will designate a responsible engineer to complete the ALARA checklist in Section 5.0 below.
- 4.2 The responsible engineer will describe the task in sufficient detail to permit evaluation of the work location, the method of operation, egress routes and the length of operation.
- 4.3 An estimate of existing exposure and radiation levels along with the sources must be detailed, a sketch showing work location and sources is suggested. A second estimate of the exposure reduction after implementation of the ALARA recommendation shall also be provided.
- 4.4 PECO planning and scheduling shall provide to the responsible engineer the estimated impact of implementing the recommended ALARA action.
- 4.5 The responsible engineer shall present the completed ALARA checklist to the ALARA committee for review.
- 4.6 The ALARA committee (GE/CB&I/PECO) will review the ALARA guidance and advise on, consent with, or document reason for rejection of the recommendation; the responsible engineer will submit the checklist to PECO for approval.
- 4.7 PECO concurrence with the recommendation shall be documented by signature/date on the checklist; if PECO rejects the ALARA guidance the reason for rejection shall be stated.

5.0 ALARA CHECKLIST

Each ALARA Checklist documenting the mitigating measures shall be numerically sequenced. The Checklist (see Attachment) shall have the following information:

- 5.1 Task and Purpose: Describe task, purpose of the ALARA guidance, expected impact, alternatives considered, guidance provided at other sites, advantages/disadvantages.
- 5.2 Exposure Estimate: Identify radiation levels, background and hot spot sources, date of radiation survey, radiation level reductions due to ALARA or other considerations, expected exposure hours, estimated exposure with and without ALARA guidance.
- 5.3 Schedule Impact: Estimated duration to implement ALARA guidance, estimate critical path impact, describe potential schedule improvement achievable using ALARA guidance.
- 5.4 Cost: Estimated cost to implement ALARA guidance, describe potential cost saving achievable using ALARA guidance.
- 5.5 Project Concurrence: Sign off by PECO coordinator, Planning & Scheduling, Construction.
- 5.6 Reasons for Rejection: ALARA committee or PECO Project state reason that ALARA guidance is not accepted.

ALARA CHECKLIST

Mitigating Measure:

Task and Purpose:

Exposure Estimate:

Schedule Impact:

Cost:

ALARA Committee

Chairman /Date

ALARA Coordinator/Date

Planning & Scheduling/Date

Construction/Date

Reason for Rejection: