From:	Baca, Bernadette
To:	"Olberding, Jodie Y."
Cc:	O"Donnell, John; Simpson, Eric
Subject:	RE: RE: Current Site Status and upcoming July 20-24, 2020 Occupational Radiation Safety Inspection (71124.02 and 71124.04)
Date:	Monday, June 8, 2020 12:16:00 PM
Attachments:	CNS 20200003 RS24 Wishlist.docx

Jodie,

Thank for all the information ahead of time.

It is correct, we would be using commercial transportation to arrive a the site. The ten plus hours is a little more than I'm willing to undertake at this time. Since most airlines are doing their best to maintain social distancing at this time, I think commercial travel would be the most expedient, reliable and efficient mode of transportation. Driving would still expose us to the virus (fuel stops, bio-breaks, restaurants, etc.), especially for a trip that lengthy.

Eric Simpson will be joining me for the inspection as an observer, or more appropriately, inspector-in-training.

Bernadette Baca

Health Physicist
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817-200-1235

REGION IV VISION: Together, we work to foster a culture of high trust that maximizes professional growth and inspires leadership at all levels

The first step is clearly defining what it is you're after, because without knowing that, you'll never get it. - Halle Berry, Actress

The following items are requested for the
Remote Occupational Radiation Safety Inspection
at Cooper Nuclear Station

Dates of Inspection: July 20 – 24, 2020

Integrated Report 2020-003

Inspection areas are listed in the attachments below.

Please provide the requested information on or before **Monday, July 13, 2020**.

Please submit this information using the same lettering system as below. For example, all contacts and phone numbers for Inspection Procedure 71124.0**2** should be in a file/folder titled "**2**-A," applicable organization charts in file/folder "**2**-B," etc.

The information should be provided in electronic format or a secure document management service. If information is placed on *a secured document management system*, please ensure the inspection exit date entered is at least 30 days later than the onsite inspection dates, so the inspectors will have access to the information while writing the report.

In addition to the corrective action document lists provided for each inspection procedure listed below, please provide updated lists of corrective action documents at the entrance meeting. The dates for these lists should range from the end dates of the original lists to the day of the entrance meeting.

If more than one inspection procedure is to be conducted and the information requests appear to be redundant, there is no need to provide duplicate copies. Enter a note explaining in which file the information can be found.

If you have any questions or comments, please contact Bernadette Baca at 817-200-1235 or via e-mail at Bernadette.Baca@nrc.gov.

PAPERWORK REDUCTION ACT STATEMENT

This letter 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, control number 3150-0011.

2. Occupational ALARA Planning and Controls (71124.02)

Date of Last Inspection: **October 19, 2018**

A. List of contacts and telephone numbers for ALARA program personnel, as well as the Licensing/Regulatory Affairs staff. Please include area code and prefix. If work cell numbers are appropriate, then please include them as well.

B. Applicable organization charts including position or job titles. Please include as appropriate for your site, Site Management, RP, Chemistry, Maintenance (I&C), Engineering, and Emergency Protection.

C. Copies of audits, self-assessments, LARs, and LERs, written since the date of last inspection, focusing on ALARA

D. Procedure index for ALARA Program procedures and other related disciplines.

E. Please provide specific procedures related to the following areas noted below. Additional Specific Procedures may be requested by number after the inspector reviews the procedure indexes.

1. ALARA Program
2. ALARA Planning
3. ALARA Reviews
4. ALARA Committee
5. Radiation Work Permit Preparation

F. Please provide a list of NRC Regulatory Guides and NUREGs that you are currently committed to relative to this program. Please include the revision and/or date for the commitment and where this may be located in your current licensing basis documents.

G. Please provide a summary list of corrective action documents (including corporate and sub-tiered systems) written since the date of last inspection, related to the ALARA program, including exceeding RWP Dose Estimates since the date of the last inspection.

> NOTE: These lists should include a description of the condition that provides sufficient detail that the inspectors can ascertain the regulatory impact, the <u>significance level</u> assigned to the condition, the status of the action (e.g., open, working, closed, etc.) and the <u>search criteria</u> used. Please provide in document formats which are “sortable” and “searchable” so that inspectors can quickly and efficiently determine appropriate sampling and perform word searches, as needed. (Excel spreadsheets are the preferred format.) If codes are used, please provide a legend for each column where a code is used.

H. List of work activities (RWPs) greater than 1 rem, since the date of the last inspection, including the original dose estimates and actual doses accrued. (Excel format preferred). Please provide all revisions/changes, as well as any related RWPs that support the work activity.

Provide any post evaluations, lessons learned, and/or corrective action documents generated as a result of this work activity. If available, provide any justifications/reasons for actual dose exceedances of the initial dose estimate.

I. Provide a copy of the ALARA outage reports or evaluations for the two most recently completed outages. The most recent outage was October 2018.

J. Site dose totals for the past 3 years (based on dose of record). In addition, please provide another document that separates the online and outage doses for the past 3 years.

K. Most recent assessment of your isotopic mix, including the hard-to-detect radionuclides and alpha hazards. Include a list of new and historical exposure issues (radiological source term or high exposure areas/activities).

L. Current exposure trends (BRAC dose rates and/or source term information)

M. Please provide the methods/reports that are in your process to meet the requirements of 10 CFR 20.1101(c) for periodic review of your RP program.

4. Occupational Dose Assessment (Inspection Procedure 71124.04)

Date of Last Inspection: **February 16, 2018**

A. List of contacts and telephone numbers for the Dose Assessment personnel, as well as the Licensing/Regulatory Affairs staff. Please include area code and prefix. If work cell numbers are appropriate, then please include them as well.

B. Applicable organization charts including position or job titles. Please include as appropriate for your site, Site Management, RP, Chemistry, Maintenance (I&C), Engineering, and Emergency Protection.

C. Copies of audits, self-assessments, vendor or NUPIC audits of contractor support, and LERs written since date of last inspection, related to Occupational Dose Assessment

D. Procedure indexes for Occupational Dose Assessment procedures and other related disciplines.

E. Please provide specific procedures related to the following areas noted below. Additional Specific Procedures will be requested by number after the inspector reviews the procedure indexes.

1. Radiation Protection Program
2. Radiation Protection Conduct of Operations
3. Personnel Dosimetry Program
4. Electronic Dosimeters
5. Air Sample Analysis
6. Performance of High or Special Exposure Work
7. Declared Pregnant Worker
8. Bioassay Program (Internal Dose Assessment)

F. Please provide a list of NRC Regulatory Guides and NUREGs that you are currently committed to relative to this program. Please include the revision and/or date for the commitment and where this may be located in your current licensing basis documents.

G. Please provide a summary list of corrective action documents (including corporate and sub-tiered systems) written since date of last inspection, associated with:

1. National Voluntary Laboratory Accreditation Program (NVLAP)
2. Dosimetry (TLD/OSL, etc.) problems
3. Electronic alarming dosimeters
4. Dose discrepancies
5. Bioassays or internally deposited radionuclides or internal dose
6. Personnel contamination events
7. Neutron dose

NOTE: These lists should include a description of the condition that provides sufficient detail that the inspectors can ascertain the regulatory impact, the significance level assigned to the condition, the status of the action (e.g., open, working, closed, etc.) and the search criteria used. Please provide in document formats which are “sortable” and “searchable” so that inspectors can quickly and efficiently determine appropriate sampling and perform word searches, as needed. (Excel spreadsheets are the preferred format.) If codes are used, please provide a legend for each column where a code is used.

H. List of positive whole body counts (excluding K-40) and skin dose assessments since date of last inspection, include date(s), reason(s), activity assessed, and doses calculated and assigned. Names and personal information must be redacted. The records can be linked/related to condition reports if needed.

I. Part 61 analyses or other analyses of plant isotopic mixture (alpha, beta, gamma, and neutron) for appropriate instrumentation calibration sources and dosimetry selection and hard-to-detect plant nuclide scaling factors for intakes/uptakes.

J. The most recent National Voluntary Laboratory Accreditation Program (NVLAP) accreditation report or, if dosimetry is provided by a vendor, the vendor's most recent results and which dosimeter(s) is (are) use at the site and for what purpose(s). (DLR, neutron, environmental, etc.)

K. Please provide the latest assessment of your radiological source term as it relates to the internal/external exposure of workers.

L. If available, please provide your latest source term reduction strategy.

M. Please provide the LLDs or MDAs for each onsite WBC or other internal dose assessment instrumentation.

N. Please provide the latest neutron source term characterization.
Describe why the neutron dosimetry used is appropriate for these locations.

O. Please provide the location of personnel dosimetry storage location(s) and controls.
Please provide a comparison of dose/dose rate for the dosimetry locations to demonstrate the storage locations are adequate for the storage of dosimetry.

P. A list of airborne radioactivity areas (and associate RWPs) where DAC-hour monitoring was used with air sampling to track and assign dose. (BZ lapel air samples, etc.). A log of air sampling data with location and results is preferable.

Q. Please provide a count of workers that declared a pregnancy, since the last inspection, and any Declared Pregnant Worker monitoring of worker and fetus performed. Please redact any sensitive information. If more than three individuals, a selection will be made to review their records in accordance with procedures.

R. A list of EDEX or multi-badge dosimetry uses since the last inspection, include the associated RWP, EAD/SRD set points, and dose accrued.

S. Please provide a summary of the electronic alarming dosimeter bias used to compare to passive dosimeters.