

Upcoming Farley RP Inspection - October 2020

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Wed 9/9/2020 2:47 PM

To: Surber, Ronnie Gene <RGSURBER@SOUTHERNCO.COM>

 1 attachments (155 KB)

Farley 2020-004 Radiation Safety Baseline Inspection Information Request.pdf;

Gene,

Per our previous email exchanges, you will be the primary point of contact for the upcoming Radiation Safety Inspection at Farley in October. If that is incorrect, please forward this email to the appropriate Licensing contact.

Attached is the Initial Request for Information. The request includes the documents for Inspection Procedures (IPs) 71124.01, 71124.03, 71124.04, 71124.05 (rad hazards, airborne, occupational dose, & instruments), and the applicable portions of 71151 (PIV).

The inspection will include both onsite and remote inspection activities. The inspectors will be Jose Diaz, William Pursley, and myself. Two of the four IPs require a large number of onsite walk downs and observational samples so at least two of the three inspectors will need to be on-site the entire week of 10/19 - 10/23/20. The weeks before and after will be used to complete remote baseline inspection activities.

Since the trend in COVID-19 cases could affect travel and accessibility to the site between now and October, please keep us informed of any adverse local COVID-19 trends, and if there are any changes in site access requirements.

Please let me know that you received this request via phone or email, and do not hesitate to contact me if you have any questions concerning the information requested..

Regards,

Bob

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Farley Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2020004

During the week of October 19 - 23, 2020, the NRC will perform a baseline Radiation Safety Inspection at Farley Nuclear Plant (NRC Inspection Procedures 71124.01, 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 October 5, 2020.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner at 404-997-4508, or the Engineering Branch 3 Branch Chief, Binoy Desai, at 404-997-4519.

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

Occupational and Public Radiation Safety Cornerstones

Inspection Dates: October 19 - 23, 2020

Documents Due to Region II: October 5, 2020

Inspection Procedures:	IP 71124.01	Radiological Hazard Assessment and Exposure 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

Lead Inspector and Mailing Address:

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Note: The current version of these documents is expected unless specified otherwise. Secure file server access (Certrec, SharePoint, etc.), or electronic media (CD/DVD), is preferred. To the extent possible, please organize the information as it is arranged below. Experience has shown that poorly organized files can lead to a less efficient inspection and places additional burden on licensee staff. 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. To the extent possible, please organize the information as it is arranged below. Pay 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.

Documentation for these inspection procedures, are requested from April 1, 2018 to present, unless otherwise specified. Pay attention to the date ranges for the items requested as they may change from item to item. For those items requesting a list of documents/areas, the inspector will select documents/areas from the list for on-site review. The NRC requests that these documents be provided to the inspectors no later than September 4, 2020.

Miscellaneous

1. Plant Management, Radiation Protection, and Chemistry organizational charts
2. List of primary contacts for each inspection area w/phone numbers
3. Corrective Action Program (CAP) procedure(s)
4. List of radiation protection procedures, including title and number
5. Most recent 10 CFR 61 analysis for the DAW waste stream
6. Outage schedule, including work activities to be conducted during the week of the inspection (e.g. Gantt chart or similar list)

71124.01 - Radiological Hazard Assessment and Exposure Controls

(Last inspected April 2019)

1. List of outage & active Radiation Work Permits (RWPs) including dose and dose rate limits).
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 follow-up, etc.)
4. Most recent sealed source inventory record
5. Last two survey records of the ISFSI
6. ISFSI perimeter TLD results for the 3 most recent monitoring periods.
7. Copies of the As Low As Reasonably Achievable (ALARA) planning and post job reviews conducted for the last two ISFSI campaigns.
8. All self-assessments or audits covering radiological hazard assessment and exposure controls and HP controls since April 1, 2019 (if none, then provide the two most recent).
9. Corrective Action Program (CAP) documents (CR, NRC, AR, etc.) related to RP controls (e.g., radworker error, HP technician error, posting issues, radioactive source controls, HRA/LHRA/VHRA issues, survey problems, etc.) generated since April 1, 2019. *This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.*

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

(Last inspected April 2018)

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. Copy of the last 2 grade D air testing certificates for each supplied air system and SCBA filling station
4. Documentation of the last 2 surveillances performed on SCBAs available for emergency use, and negative pressure respirators designated as "in storage" but available for use.
5. Two most recent surveillances that verify the flow rates for the following ventilation systems:
 - a) Auxiliary Building Ventilation System
 - b) Decontamination and Waste Solidification Building Ventilation
 - c) Fuel Handling Building Exhaust System
6. Two most recent HEPA filter DOP and charcoal test results for the following ventilation systems:
 - a) Main Control Room and Emergency Switchgear Room Emergency Ventilation System (MCR/ESGR)
 - b) Auxiliary Building Ventilation System
7. Most recent audit or self-assessment covering airborne controls and respiratory protection
8. List of CRs related to airborne monitoring and respiratory protection since April 1, 2018. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
9. Available for onsite review during inspection
 - a) Inventory, inspection and maintenance records for respiratory protection devices and SCBA equipment
 - b) Training records, including fit tests, for SCBA qualified individuals

- c) List of all licensed operators qualified to wear an SCBA
- d) List of site ERO personnel qualified to wear an SCBA
- e) List of all RP personnel qualified to wear an SCBA
- f) Training/qualification certificates for all onsite and/or vendor personnel qualified to repair SCBA that performed maintenance or repairs from April 1, 2018 to present.

71124.04 - Occupational Dose Assessment

(Last inspected April 2018)

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 2018, 2019, and the current dosimetry used by the 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, 2018. *[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 facial contamination and Level III personnel contamination events identified since April 1, 2018. *[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 (including the ISFSI area)
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, 2018 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

(Last inspected April 2018)

1. Radiation Protection and Maintenance procedures/guidance documents, as applicable, for the following:
 - 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, counting room equipment, electronic alarming dosimeters, whole body counting equipment, and continuous air monitors
 - c) Collection and analysis of high-range, post-accident effluent samples
 - d) Determination of set-points for area radiation monitor, CAM, PCM, PM, and SAM equipment used for area and personnel monitoring equipment
 - e) QA program (inter-laboratory comparison program) for count room instruments
2. The last 2 calibration records for each of the following instruments:
 - a) U-2 Containment High-Range Radiation Monitors (CHRRMS)
 - b) Main Control Room (1-RM-RMS-157)
 - c) Condenser Air Ejector Monitors (1-SV-RM-121)
 - d) Main Steam Line Radiation Monitors (2-MS-RM-270 and 273)

- e) Liquid Waste Effluent Monitor (1-LW-RM-110,111)
- f) Process Vent (1-GW-RM-178-1) [Normal-Range Noble Gas Effluent Monitor]
- g) Process Vent (1-GW-RM-178-2) [High Range Noble Gas Effluent Monitor]
- 3. Documentation showing traceability to NIST and/or the primary calibration for the radioactive sources used to calibrate the instruments in item in item 2 above.
- 4. Chart or procedure listing EALs associated with radiation monitors
- 5. Emergency plan documents identifying which radiation monitors are used to determine emergency action levels (EALs).
- 6. Provide a current list of in service (available for use) SAMs, PCMs, PMs, air samplers, continuous air monitors (CAMs), portable radiation detection instruments, counting room (RP and Chemistry), and Whole Body Counters. *[Note: The list will be used to select monitors for evaluation during the onsite inspection.]*
- 7. Most recent test record of the instrument calibrator (e.g. Shepherd validation testing/dose rate curves).
- 8. Design documents and/or calculations showing how the alarm setpoints for the following instruments are determined:
 - a) PCMs and PMs at the RCA and Protected Area exit points
 - b) CAMs
- 9. Results of the Inter-Laboratory Comparison Program for 2018 and 2019.
- 10. Most recent Radiation Monitoring System engineering performance review/evaluation or system health report, if applicable.
- 11. 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.
- 12. List of CAP documents (CR, NRC, AR, etc.) related to portable instruments, area monitors, CAMs, RCA release point monitors, WBCs, and count room instruments generated since April 1, 2018. *This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.*

71151 – Performance Indicator Verification (Occupational and Public Cornerstones)
(Last inspected March 2019)

- 1. Procedure(s) for gathering and reporting PI data
- 2. List of all CRs related to effluent dose/ODCM issues since March 1, 2019. *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 1, 2019. *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 1, 2019 (dose and dose rate).

Assistance Requested During On-Site Inspection

- Identification of radiological work activities available during the inspection week for observation, including notification of pre-job briefings, notification of risk significant work activities, and location of audio/visual surveillance for remote job coverage.
- Health physics assistance in plant walk-downs and information concerning job coverage of ongoing activities to assess access controls.

Inspector Contact Information:

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