

**From:** [Nielsen, Adam](#)  
**To:** [Garner, Justin Keith](#)  
**Cc:** [Eggart, Jason Warren](#)  
**Subject:** Document request for Browns Ferry RP inspection. Report number 2021-02  
**Date:** Monday, January 25, 2021 2:44:00 PM  
**Attachments:** [BF 2021-02 RP doc request.pdf](#)

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The document request is attached. We would like the documents available to us by February 26 if possible. Please don't hesitate to call me if you have any questions.

Thanks,  
Adam

Browns Ferry Nuclear Plant  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2021002

During the weeks of March 8 – 12, and April 12 – 16, 2021, 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 26, 2021.

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 Engineering Branch 3 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

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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 8 - 12 and April 12 - 16, 2021

Documents Due to Region II: February 26, 2021

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 (Occupational Cornerstone Only)

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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. 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 outage RWPs
5. List of all non-fuel items stored in spent fuel pool
6. Most recent self-assessment or audit covering RP controls
7. 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 February 29, 2020. *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. ALARA planning packages for the top 5 dose jobs for the upcoming refueling outage (including dose estimates, work hour estimates, special RP controls, and dose reduction initiatives)
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 March 23, 2019. *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
  - a) List of all licensed operators qualified to use SCBA
  - b) 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 March 23, 2019. *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 March 23, 2019. *[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 March 23, 2019. *[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 source term characterization
6. Most recent alpha source term characterization
7. Area TLD results for general plant areas (not REMP TLDs), going back two years.
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 March 23, 2019, 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 2 Drywell High-range Area Radiation Monitors (last two for each)
  - b) Unit 2 TIP Room Area Radiation Monitor
  - c) Liquid Radwaste System Effluent Monitor
  - d) Main Stack (normal range and wide range, last two calcs for each)
  - e) Radwaste Building Ventilation Exhaust Monitor
3. Radioactive source paperwork for the sources used to calibrate the instruments in item 2 above.
4. Chart or procedure listing EALs associated with radiation monitors
5. The last 2 calibration records for each of the following instruments:
  - a) All Portal Monitors located at RCA exit
  - b) All Small Article Monitors located at RCA exit
  - c) All Whole body contamination monitors (ARGOS or equivalent) at RCA exit
  - d) Whole Body Counter in dosimetry
6. Most recent test record of the instrument calibrator (Shepherd validation testing/dose rate curves)
7. Interlaboratory comparison results for the onsite count room, going back two years.
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 March 23, 2019 related to portable instruments, area monitors, effluent 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 Cornerstone Only)

1. Procedures for gathering and reporting NRC Performance Indicator (PI) data, including any applicable “desktop guides”.
2. List of electronic dosimeter alarms since February 29, 2020 (dose and dose rate)