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**Subject:** NRC Radiation Safety Inspection - Surry June 2021  
**Date:** Thursday, May 6, 2021 6:40:00 AM  
**Attachments:** [SUR 2021003 RP Document Request List.pdf](#)

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Maria,

Thank you for your assistance during the Radiation Safety Inspection was completed at Surry in April.

Attached is the Document Request for the upcoming Radiation Safety inspection in June 2021. The inspection will include Inspection Procedures (IPs) 71124.02 (partial), 71124.06, 71124.07, 71124.08, and 71151. As with most of the radiation safety inspections, these inspection procedures involve a large number of observational activities.

If you plan to upload the requested documents to CERTREC, using software to 'zip' the numerous files into a single file prior to upload has proven to be very efficient. Also, keeping the directory and file names short but discernable makes the zip and unzip process work well.

As we discussed in April, the inspectors plan to be onsite the week of June 28, 2021. The inspectors will be myself, Jose Diaz, and Jonathan Rivera.

Hopefully there will be no change in work or travel guidance due to COVID-19 between now and the end of June. If conditions or restrictions change significantly, we may pursue some combination of partial, remote, or a reduction in onsite inspection time to complete the inspection activities. Please update me if Dominion or Surry decides to modify, reduce, or limit onsite access. I will let you know if I receive any information regarding restriction of travel from NRC management.

Please let me know if you have any questions.

Regards,

Bob

***Robert Kellner***

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Surry Nuclear Power Station  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2021003

During the week of June 28 - July 2, 2021, the NRC will perform a baseline Radiation Safety Inspection at the Surry Nuclear Power Station (NRC Inspection Procedures 71124.02, 7124.06, 71124.07, 71124.08, 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 June 17, 2021.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner at [Robert.Kellner@nrc.gov](mailto:Robert.Kellner@nrc.gov), at 404-997-4508, 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

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: June 28 - July 2, 2021

Documents Due to Region II by: June 17, 2021

Inspection Procedures:	IP 71124.02	Occupational ALARA
	IP 71124.06	Gaseous and Liquid Effluent
	IP 71124.07	REMP
	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation
	IP 71151	Performance Indicator Verification

#### Lead Inspector & 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.

Limited documentation for IP 71124.02 is requested from April 1, 2021 to present. Documentation for Inspection Procedures IP 71124.06 and 71124.07 is requested from September 1, 2019 to present; for IP 71124.08 from October 1, 2019 to present; and for IP 71151 documentation is requested from March 1, 2020 to present. We would prefer as much of the information as possible in electronic form. An index of the files is also helpful. For those items requesting a list of items/documents/areas, the inspector will select items/documents/areas from the list for on-site review.

#### Miscellaneous

1. List of primary contacts for each inspection area including names and telephone numbers
2. Radiation Protection, and Chemistry organizational charts w/ contact numbers
3. Corrective action program procedure(s)
4. List of radiation protection and chemistry procedures, including title and number.

#### 71124.02 - Occupational ALARA

(Last inspected November 2018)

1. Unit 1 R30 Refueling (spring 2021) outage ALARA reports, if available.
2. ALARA trending point survey data obtained during the spring 2021 outage (EPRI SRMP, Day 5 post-shutdown, etc.).
3. Minutes from all Plant ALARA Committee Meetings that occurred from April 1, 2021 thru present regarding outage ALARA activities and plans (e.g. revised/approved dose projections, dose goal changes, etc.).
4. In progress and post-job reviews for ALARA Plans: **21-016**, U1R30 Primary S/G Eddy Current; **21-003**, U1R30 Ops Outage Support; and **21-010**, U1R30 Scaffold Activities, which were completed during the spring 2021 outage.
5. List, with a short description and install & removal dates, of temporary shielding packages installed during the spring 2021 outage.
6. List of CAP documents (CR, NRC, AR, etc.) related to ALARA generated since April 1, 2021. *This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.*

#### 71124.06 - Radioactive Gaseous and Liquid Effluent Treatment

(Last inspected September 2019)

1. Procedures for sampling and controlling radioactive gaseous and liquid effluents to include: collection, analysis, release, alarm setpoints, offsite dose calculation and evaluation.
2. Provide a list of changes made to the Offsite Dose Calculation Manual (ODCM), meteorological dispersion or deposition factors, and radioactive effluent processing/discharge systems since August 1, 2019.
3. List of "out of service" (OOS) effluent monitors and duration since August 1, 2019.
4. List of unmonitored spills, leaks, or unexpected liquid/gaseous discharges since August 1, 2019.
5. Provide a schedule of expected or planned routine effluent sampling activities (e.g. weekly main vent stack, groundwater sampling, etc.) during the planned inspection week.
6. Material condition surveillance records for effluent treatment system components not readily accessible for any reason (e.g. in-service & spent resin tanks, waste gas hold-up tanks, etc.).
7. The last two inter-laboratory comparison program results (for the onsite counting lab).
8. Most recent audit, self-assessment, and/or review of the radioactive effluent monitoring program
9. List of CAP documents generated since August 1, 2019, as a result of gaseous and liquid effluent processing and/or ODCM related activities. *This should be a list of documents containing a CAP document number and a brief description, not complete documents.*

#### 71124.07 - Radiological Environment Monitoring Program (REMP)

(Last inspected September 2019)

1. Procedures for radiological environmental monitoring, including but not limited to:
  - Collection, preparation and analysis of environmental samples
  - Calibration and maintenance of REMF air and/or water samplers

- Calibration of meteorological monitoring instruments
  - Periodic meteorological instrumentation surveillance requirements
  - Land use census
  - Calibration and quality control of for sample counting instruments
2. Procedures associated with the NEI/industry groundwater protection initiative.
  3. Copy of the 2019 and 2020 Land Use Census Evaluation or Report.
  4. Collection schedule for REMP samples to be obtained during the planned inspection week, and contact information for collection staff.
  5. Last two calibration records for ALL REMP air and water sampling equipment.
  6. Last two calibration records for meteorological monitoring instrumentation on the primary tower (wind speed & direction, and air temperature).
  7. Data recovery report for meteorological monitoring instruments since August 1, 2019.
  8. List of systems, structures and components identified as credible mechanisms for the potential release of licensed material to the groundwater (e.g. SSC risk ranking matrix)
  9. List of any non-radioactive system that has become contaminated since August 1, 2019.
  10. Summary of any leaks and/or spills that have occurred since August 1, 2019 (e.g. copy of 10.75g file).
  11. Copies of any reports to the NRC regarding abnormal onsite spills/leaks or radioactive material since August 1, 2019.
  12. Groundwater monitoring results since August 1, 2019.
  13. Environmental TLD results since August 1, 2019.
  14. List of onsite surface water bodies (e.g. ponds, retention basins, lakes) that contain or can potentially contain radioactivity
  15. Most recent audit/self-assessment of REMP activities, including audits of vendor activities.
  16. List of CAP documents related to REMP activities or groundwater, including leaks or spills since August 1, 2019. *This should be a list of documents containing a CAP document number and a brief description, not complete documents.*

71124.08 - Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation  
(Last inspected October 2019)

1. Provide procedures/guidance documents describing licensee compliance with 10 CFR 20, 61, and 71, and 49 CFR 170-189. Procedures/manuals should include:
  - Solid and liquid radioactive waste (radwaste) processing procedures
  - Procedure(s) for transferring radwaste resin and sludge discharges into shipping/disposal containers
  - Waste stream mixing and/or sampling procedures, including:
    - a. waste concentration averaging
    - b. use of scaling factors and calculations used to account for difficult-to-measure radionuclides
    - c. ensuring waste stream composition data accounts for changing operational parameters
  - Shipping/transportation procedures

- Cask loading and closure procedures (licensee and vendor) applicable to last three cask transports
  - Monitoring impact of long-term storage of RAM
  - Process Control Program (PCP)
2. Site specific and corporate procedures related to 10 CFR Part 37 compliance (storage of RAM, 10 CFR Part 37 Security Plan, radiation protection and security procedures that identify radiation protection interaction with security, or requirements related to 10 CFR Part 37 compliance, etc.)
  3. List of locations of Category 1 and 2 material.
  4. Supporting calculations for determination of whether an aggregation of RAM meets the definition of Category 1 or Category 2 (e.g., warehouse calculation).
  5. List of Nationally Tracked Sources, and copies of any National Source Tracking System (NSTS) transaction documentation (e.g., annual reconciliation).
  6. Copies of the two most recent sealed source inventory records.
  7. Most recent radio-chemical sample analysis results (i.e., "10 CFR Part 61" analysis) for each of the radwaste streams (e.g., dry active waste (DAW), ion exchange resins, mechanical filters, and sludges and activated materials). For the most recent analyses of Dry Active Waste (DAW), include QA data (e.g. in-house vs. vendor lab comparisons, current results vs. database, etc.).
  8. List and documentation of any changes made to the radwaste processing systems (liquid and solid) and/or the PCP since October 1, 2019, and associated 10 CFR 50.59 documentation, as appropriate
  9. Copies of applicable transport cask Certificate of Compliance for the last three transport cask shipments
  10. List of RAM storage areas, including satellite radiological controlled areas (RCAs)
  11. Log of RAM shipments (LSA I, II, III; SCO I, II, Type A, or Type B) since October 1, 2019. (The inspectors will select three to five packages to review in detail.)
  12. Most recent self-assessment or audit of Shipping/radwaste processing and RAM storage programs
  13. List of CAP documents (AR, CR, NCR, etc.) related to radwaste and RAM processing and/or transportation (e.g., keyword searches for RAM, shipping, radwaste, 10 Part 61, etc.) issued since October 1, 2019. *This should be a list of corrective action documents containing an (AR, CR, NCR, etc.) number and brief description, not full documents.*
  14. Available for onsite review during the inspection
    - Site drawing(s) showing the location of stored RAM and stored radwaste
    - Plant drawings sufficient to permit the inspector to walkdown the liquid and solid radwaste processing systems, to verify current system configuration/ operation agree with the descriptions contained in the Updated Final Safety Analysis Report and in the PCP.
    - Training and qualification records for personnel responsible for radwaste processing, packaging, and making shipments of radioactive material (RAM) and radwaste.
    - Training and qualification records for personnel responsible for implementation of the 10 CFR Part 37 security plan (e.g., security staff and health physics staff)
    - Documentation describing the status of any radwaste process equipment that is not operational and/or is abandoned in place.

- Discussion of the site's waste disposal volume and waste reduction program.

71151 – Performance Indicator Verification (Occupational and Public Cornerstones)  
(Last inspected May 2020)

1. Site and corporate procedure(s) for gathering and reporting PI data.
2. Copy of the most recent gaseous and liquid effluent release permits indicating the current dose to the public (year-to-date doses).
3. List of CAP documents since March 1, 2020, using keywords such as: HRA, LHRA, VHRA, unintended dose, unlocked LHRA door, etc. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
4. List of CAP documents related to effluent dose/ODCM issues since March 1, 2020, using keywords such as: abnormal/ unmonitored effluent release, etc. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
5. List of ED dose and dose rate alarms since March 1, 2020.

Onsite Assistance During Inspection

- Health Physics assistance coordinating walk-downs of the meteorological tower, and gaseous and liquid waste processing systems.
- Health Physics /Chemistry coordination for observation of REMP and effluent sampling activities (REMP Run and on-site effluent samples).
- Identification of any radioactive material packaging, shipping, or transportation activities available during the inspection for inspector observation.
- Coordination with security to review and discuss the annual Access Authorization and Security Program reviews completed by the site.
- HP assistance in plant walkdowns of areas identified for storage of Category 1 and 2 materials.

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