

**From:** [Baca, Bernadette](#)  
**To:** [Sterling, Lance](#)  
**Cc:** [Brost, Wendy \(webrost@STPEGS.COM\)](#); [O'Donnell, John](#); [Simpson, Eric](#)  
**Subject:** 2021 STP July Inspection-2RS67 Wishlist (71124.06 and 71124.07)  
**Date:** Monday, May 24, 2021 6:27:00 PM  
**Attachments:** [2021 STP July Inspection-2RS67 Wishlist.docx](#)

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ML21160A152

Lance,

I'm send the Request for Information a little early in hopes this will allow appropriate time to collect the information for the July 19-23, 2021, Public Safety Cornerstone Inspection of 71124.06 Effluents and 71124.07 REMP.

I will be the primary contact for this inspection and Eric Simpson will accompany me. If staffing changes, I will inform you. At this time we are planning an onsite inspection; however, if COVID conditions change, we may need to alter our onsite inspection.

All requested documents should be uploaded on or before **July 6, 2021**.

Also, if available, what are your current COVID levels and restrictions for the local area and at your site, if any? Are there any specific restrictions we should be aware of before visiting the site?

*The information requested may be provided in either electronic or paper media or a combination of these;* though electronic form is preferred. Information provided in electronic media may be in the form of uploads for a secured document management service, e-mail attachments, or CD. The agency's text editing software is MS Word; however, we have document viewing capability for Adobe Acrobat (.pdf) text files.

If you have questions or concerns, please contact me.

Thank you and see you soon.

P.S. If you are not the correct contact for this inspection, please pass it on to the appropriate staff member and 'CC' the team lead. We request in advance that these documents remain accessible for a period of at least 45 days post the Exit meeting date.

*Bernadette Baca*

Health Physicist  
US NRC Region 4, DNMS, RxIB  
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*

*\*There is no such thing as failure, there's just giving up too soon. - Jonas Salk, virologist, medical researcher*

**The following items are requested for the  
Public Radiation Safety Inspection  
at South Texas Project**

**Dates of Inspection: 07/19/2021 to 07/23/2021**

**Integrated Report 2021003**

Inspection areas are listed in the attachments below.

Please provide the requested information on or before **Tuesday, July 06, 2021**

Please submit this information using the same lettering system as below. For example, all contacts and phone numbers for Inspection Procedure 71124.06 should be in a file/folder titled "6-A," applicable organization charts in file/folder "6-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](mailto: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.

**6. Radioactive Gaseous and Liquid Effluent Treatment (71124.06)**

Date of Last Inspection: **July 23, 2018**

- A. List of contacts and telephone numbers for the following areas. Please include area code and prefix. If work cell numbers are appropriate, then please include them as well.
1. Radiological effluent control (liquid & gaseous) and reporting (RP, Chemistry, RW, Ops, etc.)
  2. Engineered safety feature air cleaning systems for effluent release (Systems Engineering, I&C, Maintenance, etc.)
  3. Licensing/Regulatory Affairs
- B. Applicable organization charts including position or job titles for the above individuals and also for their supportive Management. Please include as appropriate for your site, Site Management, RP, Chemistry, Maintenance (I&C), Engineering, and Emergency Protection. (Recent pictures are appreciated.)
- C. Copies of audits, self-assessments, vendor or NUPIC audits of contractor support, and LERs written since the date of the last inspection, related to:
1. Radioactive effluents
  2. Engineered Safety Feature Air cleaning systems
- D. Procedure indexes for the following areas and related disciplines.
1. Radioactive effluents
  2. Engineered Safety Feature Air cleaning systems (both TS and non-TS systems for effluents)
- E. Please provide specific procedures related to the following areas noted below. Additional procedures may be requested by number after the inspector reviews the procedure indexes.
1. Sampling and analysis of radioactive effluents
  2. Effluent monitor setpoint determination
  3. Generating radioactive effluent release permits
  4. Laboratory instrumentation quality control
  5. In-place testing of HEPA filters and charcoal adsorbers for TS effluent exhaust systems and other effluent air-cleaning systems, but not breathing air systems
- 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 the last inspection, associated with:
1. Radioactive effluents
  2. Engineered Safety Feature Air cleaning systems (effluents, not breathing air)

**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. Annual Radioactive Effluent Release Reports since the last inspection
- I. Current revision of the Offsite Dose Calculation Manual (or other name, but include all parts for effluents) and any changes made since the last inspection
- J. The inter-laboratory comparison results for laboratory quality control performance of effluent sample analysis since the last inspection
- K. Effluent sampling schedule for the week of the inspection
- L. Listing or log of liquid and gaseous release permits since the date of the last inspection
- M. A list of the technical specification-required air cleaning systems with the three most recent surveillance test dates of in-place filter testing (of HEPA filters and charcoal adsorbers) and laboratory testing (of charcoal efficiency) and the work order numbers associated with the surveillances (and their system number/name); surveillances covering the span since the last inspection and one surveillance prior for comparison.
- N. A list of any occurrence in which a non-radioactive system was contaminated by a radioactive system since the date of the last inspection. Please include any relevant condition report(s).
- O. Current Part 61 analyses for hard to detect radionuclides
- P. Latest Land Use Census (coordinate with 71124.07)
- Q. To complete the annual portion of the Public Safety Performance Indicator review (IP71151), please provide the 2021 monthly and/or quarterly review of effluent release doses to regulatory limits.

## 7. Radiological Environmental Monitoring Program (71124.07)

Date of Last Inspection: **July 23, 2018**

- A. List of contacts and telephone numbers for the following areas. Please include area code and prefix. If work cell numbers are appropriate, then please include them as well.
  - 1. Radiological environmental monitoring (RP, Chemistry, I&C, etc.)
  - 2. Meteorological monitoring (RP, Chemistry, EP, I&C, System Engineering, etc.)
  - 3. Maintenance and calibration of the above equipment
  - 4. Licensing/Regulatory Affairs
  
- 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. (Recent pictures are appreciated.)
  
- C. Copies of audits, self-assessments, vendor or NUPIC audits of contractor support, and LERs written since the date of the last inspection, related to:
  - 1. Radiological environmental monitoring program (including contractor environmental laboratory audits, if used to perform environmental program functions)
  - 2. Environmental TLD processing facility
  - 3. Meteorological monitoring program
  
- D. Procedure index for the following areas and other related disciplines.
  - 1. Radiological environmental monitoring program
  - 2. Meteorological monitoring program
  - 3. Maintenance and calibration of related instrumentation, including the meteorological tower
  
- E. Please provide specific procedures related to the following areas noted below. Additional procedures may be requested by number after the inspector reviews the procedure indexes.
  - 1. Sampling, collection and preparation of environmental samples
  - 2. Sample analysis (if performed onsite)
  - 3. Laboratory instrumentation quality control
  - 4. Meteorological Tower sensor calibrations
  - 5. Current revision of the Offsite Dose Calculation Manual (or other name, but include all parts for environmental monitoring) and any changes made since the last inspection.
  
- 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 the last inspection, related to the following programs:

1. Radiological environmental monitoring (include TLDs and air sample pumps or their infrastructure)
2. Meteorological monitoring (include Met Tower sensors and support equipment)

**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. Copies of the three most recent calibration packages for the meteorological tower instruments; calibrations since the last inspection
- I. Technical requirements manual or licensee-controlled specifications which list the meteorological instruments' calibration requirements.
- J. Copies of the Annual Radiological Environmental Operating Reports and Land Use Census since the last inspection, and current revision of the Offsite Dose Calculation Manual. Please include any supportive documentation for the changes made to the ODCM since the last inspection.
- K. Copy of the environmental laboratory's inter-laboratory comparison program results since the last inspection, if not included in the Annual Radiological Environmental Operating Report
- L. Data from the environmental laboratory documenting the analytical detection sensitivities for the various environmental sample media (i.e., air, water, soil, vegetation, and milk)
- M. Quality Assurance audits (e.g., NUPIC) for contracted services
- N. Current NEI Groundwater Protection Initiative (GPI) Plan and status. Provide the most recent monitoring results for each monitoring well per the GPI. Provide a separate list of any missed samples, as applicable.
- O. If applicable, per NEI 07-07, provide any reports that document any spills/leaks to groundwater since the date of the last inspection. Please indicate what external communications were made regarding each spill/leak.
- P. Provide any new entries into 10 CFR 50.75(g) files since the date of the last inspection.
- Q. Please identify your three highest X/Q (chi/Q) and/or D/Q sectors, as currently used in the selection of your required REMP sampling locations. If these are different values from your most recent meteorological assessment, please provide that assessment and indicate the three highest X/Q and/or D/Q sectors per your latest assessment. Also indicate your noted predominant and least prevalent wind direction/sector, as used in your REMP analysis.
- R. Provide the height of the highest effluent release point. Please indicate if the height accounts for plant grade elevation. Please also provide the most probable atmospheric release height, if different from the highest effluent release point.

- S. Please provide a schedule of any planned REMP sampling activities while we, the NRC, are scheduled to be onsite performing this inspection.