

Turkey Point Nuclear Plant  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2020-004

During the week of October 5 – 9, 2020, the NRC will perform a baseline Radiation Safety Inspection at Turkey Point Nuclear Plant, Units 3 and 4 (NRC Inspection Procedures 71124.01 and 71124.08). 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 **Thursday, October 1, 2020**.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Jonathan Rivera at 404-997-4646, 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/readingrm/adams.html>.

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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

Inspection Dates: October 5 - 9, 2020

Documents Due to Region II by: October 1, 2020

Inspection Procedures: IP 71124.01 Radiological Hazard and Exposure Controls  
IP 71124.08 Radioactive Waste Processing and Radioactive  
Material Handling, Storage and Transportation

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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. 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.

Documentation for these inspection procedures, are requested from the last inspection dates indicated below for each inspection area, unless otherwise specified. We would prefer as much of the information as possible in electronic form. An index of electronic contents is also helpful. For those items requesting a list of documents/areas, the inspector will select documents/areas from the list for on-site review.

### Miscellaneous

- Organizational chart of site management.
- Listing of primary site contact(s) for each inspection area including name(s) and telephone numbers.
- Corrective Action Program procedures.
- Schedule of major maintenance/work activities during the week of the inspection (Gantt chart if available).

### 71124.01 - Radiological Hazard Assessment and Exposure Controls

(Last Inspected April 2019)

1. List of active routine and outage related Radiation Work Permits (RWP), including their administrative limits, electronic dosimeter dose rate limit, and dose limit.

2. Procedures related to Radiation Protection (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. List of locations, or plant maps indicating the location, of all Locked High Radiation Areas (LHRAs) and Very High Radiation Areas (VHRAs). Include areas with the potential to become a LHRA during routine operations or outages.
4. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow up, etc.).
5. List of Nationally Tracked Sources and copies of any National Source Tracking System (NSTS) transaction documentation (e.g. change of ownership and annual reconciliation).
6. Copy of the most recent sealed source inventory record.
7. List of all non-fuel items stored in the spent fuel pools.
8. Last two surveys of the Independent Spent Fuel Storage Installation (ISFSI) area.
9. All self-assessments and audits covering RP controls since April 1, 2019.
10. List of Corrective Action Program (CAP) documents (CRs, NCRs, PIPs, etc.) related to RP controls (e.g. keyword searches for radworker error, RP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.) generated since April 1, 2019. This should include CAP nonconformance reports where the cause was listed as human performance. *This should be a list of corrective action documents containing a (CR, NCR, etc.) number and brief description, not full documents.*
11. All CAP nonconformance reports (AR, CR, NCR, etc.) related to Nationally Tracked Sources since April 1, 2019.

71124.08 - Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation (Last Inspected May 2018)

1. Provide Procedures/Guidance Documents describing licensee compliance with 10 CFR Parts 20, 61, and 71, and 49 CFR Parts 170-189. Procedures/manuals should include:
  - Solid and liquid radwaste processing procedures.
  - Procedure(s) for transferring radioactive waste resin and sludge discharges into shipping/disposal containers.
  - Waste stream mixing and/or sampling procedures, including: (1) waste concentration averaging; (2) use of scaling factors and calculations used to account for difficult-to-measure radionuclides; and (3) 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.
  - List of radioactive material (RAM) storage areas, including satellite radiological controlled areas (RCAs).
  - Monitoring impact of long-term storage (e.g., buildup of gases produced by waste decomposition, chemical reactions, container deformation).
  - Process Control Program (PCP).
2. Provide a list of RAM storage areas, including satellite radiological controlled areas (RCAs).
3. Provide liquid and solid radwaste system diagrams and detailed system descriptions (e.g., information that might be contained in curricula for training new system engineers).
4. Provide the most recent radio-chemical sample analysis results (i.e., "10 CFR Part 61" analysis) for each of the radioactive waste streams (e.g., dry active waste (DAW), ion exchange resins, mechanical filters, sludges, and activated materials).

5. List and documentation of any changes made to the radioactive waste processing systems (liquid and solid) and/or the Process Control Program (PCP) since May 1, 2018, and associated 10 CFR 50.59 documentation, as appropriate.
6. Provide a log of RAM shipments (LSA I, II, III; SCO I, II, Type A, or Type B) since May 1, 2018. (The inspectors will select three to five packages to review in detail).
7. Copies of applicable transport cask Certificate of Compliance for the last three transport cask shipments.
8. List of CAP documents (CRs, NCRs, PIPs, etc.) involving radioactive waste and RAM processing and/or transportation (e.g., keyword searches for RAM, shipping, radwaste, 10 Part 61, etc.) generated since May 1, 2018. *This should be a list of corrective action documents containing a (CR, NCR, etc.) number and brief description, not full documents.*
9. Available for onsite review during the inspection:
  - Site drawing(s) showing the location of all stored RAM and all stored radioactive waste.
  - Documentation describing the status of any radioactive waste process equipment that is not operational and/or is abandoned in place.
  - Information concerning the site's waste disposal volume and waste reduction program.
  - Training and qualification records for personnel responsible for radioactive waste.

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