

**From:** [Rivera, Jonathan](#)  
**To:** [Rivera, Jonathan](#)  
**Subject:** FW: Oconee Nuclear Station RP inspection - document request.  
**Date:** Friday, November 26, 2021 10:41:27 AM  
**Attachments:** [Oconee RP Document Request 2021-04.pdf](#)

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**From:** Rivera, Jonathan <[Jonathan.Rivera@nrc.gov](mailto:Jonathan.Rivera@nrc.gov)>  
**Sent:** Tuesday, October 12, 2021 3:18 PM  
**To:** [ONSRegAffairs@duke-energy.com](mailto:ONSRegAffairs@duke-energy.com)  
**Cc:** Nadel, Jared <[Jared.Nadel@nrc.gov](mailto:Jared.Nadel@nrc.gov)>; Nielsen, Adam <[Adam.Nielsen@nrc.gov](mailto:Adam.Nielsen@nrc.gov)>; Diaz, Jose <[Jose.Diaz-Velez@nrc.gov](mailto:Jose.Diaz-Velez@nrc.gov)>  
**Subject:** Oconee Nuclear Station RP inspection - document request.

Good afternoon,

Please find attached document request for RP inspection weeks of 11/15/21 and 11/29/21. We are requesting documentation by Friday, November 12, 2021. Also, I need to get current contact info for Regulatory Affairs as well as the current RPM at the site. Please feel free to reach out to me with any questions. I will be the lead for this inspection.

Thanks,  
Jonathan

*Jonathan Rivera*  
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**Oconee Nuclear Station**  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2021-004

During the weeks of November 15 – 19, 2021 and November 29 – December 3, 2021, the NRC will perform a baseline Radiation Safety Inspection at Oconee Nuclear Station, Units 1, 2, and 3 (NRC Inspection Procedures 71124.01, 71124.02, 71124.03, 71124.04, 71124.05 and 71151 - Occupational and Public Radiation Safety Cornerstones). 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 **Friday, November 12, 2021**.

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>.

**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

Inspection Dates: November 15 – 19, 2021 and November 29 – December 3, 2021

Documents Due to Region II by: Friday, November 12, 2021

Inspection Procedures: IP 71124.01 Radiological Hazard 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

Licensee Contact: Oconee Nuclear Station Regulatory Affairs  
[ONSRegAffairs@duke-energy.com](mailto:ONSRegAffairs@duke-energy.com)

Lead Inspector: Jonathan Rivera  
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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

- Plant Management, Regulatory Affairs, and Radiation Protection organizational charts with contact numbers.
- Listing of primary site contact(s) for each inspection area below.
- Corrective Action Program procedures.
- Schedule of major outage maintenance/work activities during the weeks of the inspection (Gantt chart if available).
- Internal and external assessments and audits for each inspection area below since the last inspection date indicated in each area below (excluding INPO).

### **71124.01 - Radiological Hazard Assessment and Exposure Controls**

(Last Inspected October 2020)

1. List of active routine and outage related Radiation Work Permits (RWPs), 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 all non-fuel items stored in the spent fuel pools.
6. List of Corrective Action Program (CAP) documents (CRs, NCRs, ARs, etc.) generated since October 1, 2020 related to RP controls (e.g. keyword searches for radworker error, RP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.). 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 number (CR, NCR, etc.) and brief description, not full documents.*

### **71124.02 - ALARA Planning and Controls**

(Last Inspected December 2019)

1. Site and/or corporate procedures related to implementation of the ALARA Program and associated procedures for maintaining dose ALARA including permanent and temporary shielding processes.
2. ALARA planning packages for the upcoming refueling outage.
3. Copies of the ALARA Committee meeting minutes, with attendance, indicating approval of the upcoming outage dose goals.
4. Site ALARA goals for 2021.
5. Plant source term reduction strategy and results achieved since December 2019.

6. List of CAP documents (CRs, NCRs, ARs, etc.) generated since December 1, 2019 related to the ALARA program. *This should be a list of corrective action documents containing a number (CR, NCR, etc.) and brief description, not full documents.*

### **71124.03 - In-Plant Airborne Radioactivity Control and Mitigation**

(Last Inspected December 2019)

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 stations.
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. The two most recent surveillances that verify the flow rates for the following ventilation systems:
  - a. Auxiliary Building Ventilation System
  - b. Control Building Ventilation System
6. The two most recent HEPA filter DOP and charcoal test results for the ventilation systems in no. 5 above.
7. List of CAP documents (CRs, NCRs, ARs, etc.) generated since December 1, 2019 related to airborne monitoring and respiratory protection. *This should be a list of corrective action documents containing a number (CR, NCR, etc.) and a brief description, not full documents.*

### **71124.04 - Occupational Dose Assessment**

(Last Inspected December 2019)

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 2020 and 2021 for the current dosimetry used by the site.
3. List of individuals and exposures for individuals receiving >500 mrem TEDE, >100 mrem neutron, >10 mrem CEDE and >500 mrem SDE since December 2019.
4. List of all facial contamination and Level III personnel contamination events identified since December 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 characterization.
6. Most recent alpha characterization.
7. Last 18 months of area TLD results for general plant areas (not REMP TLDs).
8. Copies of current whole body counter libraries (e.g. routine, medical, investigative, etc.).
9. List of CAP documents (CRs, NCRs, ARs, etc.) generated since December 1, 2019 for internal or external dosimetry issues/events. *This should be a list of corrective action documents containing a number (CR, NCR, etc.) and a brief description, not full documents.*

### **71124.05 - Radiation Monitoring Instrumentation**

(Last Inspected December 2019)

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 monitors (SAMs), personnel contamination monitors (PCMs), portal monitors (PMs), count room instrumentation, electronic alarming dosimeters, whole body counters (WBCs), and continuous air monitors (CAMs).
  - c. Collection and analysis of high-range, post-accident effluent samples.
  - d. Determination of set-points for ARMs, CAMs, PCMs, PMs, and SAMs used for area and personnel monitoring.
  - e. QA program (inter-laboratory comparison program) for count room instrumentation.
2. The last 2 calibration records for each of the following instruments:
  - a. Unit 3 Containment High-Range Radiation Monitors (CHRM)s
  - b. Plant Liquid Waste Effluent Discharge Monitor (final discharge point to environment)
  - c. Unit 3 Plant Vent Stack Monitors 3RIA-43 (particulate), -44 (iodine), -45 (noble gas), -46 (high noble gas), and -56 (high-high noble gas)
3. Documentation showing traceability to NIST and/or the primary calibration for the radioactive sources used to calibrate the instruments in item 2 above.
4. Chart and emergency planning procedures indicating emergency action levels (EALs) associated with radiation monitors.
5. Provide a current list of in-service SAMs, PCMs, PMs, air samplers, CAMs, portable radiation detection instruments, count room instrumentation, and WBCs. [Note: This list will be used to select instrumentation for evaluation while onsite].
6. Most recent test record of the instrument calibrators (e.g. Shepherd validation testing/dose rate curves).
7. 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.
8. Most recent Radiation Monitoring System engineering performance review/evaluation or system health report, if applicable.

9. List of CAP documents (CRs, NCRs, ARs, etc.) generated since December 1, 2019 related to portable instruments, ARMs, CAMs, PCMs, PMs, SAMs, WBCs, and count room instrumentation. *This should be a list of corrective action documents containing a number (CR, NCR, etc.) and a brief description, not full documents.*

**71151 – Performance Indicator Verification (Occupational and Public Radiation Safety Cornerstones)** (Last Inspected October 2020 for Occupational and July 2020 for Public)

1. Procedure(s) for gathering and reporting Performance Indicator (PI) data.
2. List of all CRs related to effluents and Offsite Dose Calculation Manual (ODCM) issues since July 1, 2020. *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 unintended doses (>100 mrem) since October 1, 2020. *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 October 1, 2020 (include dose, dose rate, and setpoints).

Lead Inspector Contact Information:

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