

From: [Nielsen, Adam](#)
To: [McNeil, Andrew Clair](#)
Subject: RP inspection document request for Sequoyah
Date: Friday, September 09, 2022 10:07:00 AM
Attachments: [SEO_2022-04_RP_Doc_Request.docx](#)

Please see the attached document request. Note that some of the items may be outside RP's purview, so some coordination with other groups might be required (e.g. rad monitor calibration records, ventilation testing records, etc.).

We would like to have the documents available by October 21, 2022. However, if you run into difficulty and need more time for certain items, just let us know and we can work with you.

Please call me with any questions.

Thanks,
Adam Nielsen
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US NRC Region II
(404) 997-4660

Sequoyah Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2022004

During the weeks of October 31 – November 4, 2022, and November 14 – November 18, 2022, the NRC will perform a baseline radiation safety inspection at Sequoyah Nuclear Plant (NRC Inspection Procedures 71124.01, 71124.03, 71124.04, 71124.05, 71124.07, 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 October 21, 2022.

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

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: October 31 – November 4, 2022
November 14 – November 18, 2022

Documents Due to Region II: October 21, 2022

Inspection Procedures:

IP 71124.01	Radiological Hazard Assessment and Exposure Controls
IP 71124.03	In-plant Airborne Radioactivity Control and Mitigation
IP 71124.04	Occupational Dose Assessment
IP 71124.05	Radiation Monitoring Instrumentation
IP 71124.07	Radiological Environmental Monitoring Program (REMP)
IP 71151	Performance Indicator Verification (Occupational and Public Cornerstones)

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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)
3. Offsite Dose Calculation Manual (ODCM)
4. Most recent 10 CFR 61 analysis for the Dry Active Waste (DAW) waste stream
5. Outage schedule showing work planned for the weeks of inspection.

71124.01 - Radiological Hazard Assessment and Exposure Controls

1. 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, etc.)
2. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm followup, etc.)
3. Procedures related to ALARA (e.g. temporary shielding, ALARA planning, source term reduction, etc.)
4. List of all non-fuel items stored in the spent fuel pool
5. ALARA work plans for the top 3 dose jobs for the upcoming outage
6. Most recent self-assessment or audit covering RP controls
7. Outage ALARA report from the previous refueling outage

8. List of CRs related to RP controls/ALARA (e.g. radworker error, RP technician error, ALARA issues, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.) created since October 9, 2021.

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. The last 2 surveillances performed on SCBA stored for emergency use (typically monthly)
6. The last 2 in-place filter testing surveillances of the HEPA/charcoal banks for the Main Control Room emergency air filtration system (typically every 18 months)
7. Most recent audit or self-assessment covering airborne controls and respiratory protection
8. List of CRs related to airborne monitoring and respiratory protection since August 29, 2020.

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, use of passive monitoring if applicable, declared pregnant workers)
2. Current NVLAP accreditation certificate for lab used to process dosimetry
3. List of all dosimetry events that resulted in the following doses since August 29, 2020:
 - CEDE > 10 mrem
 - SDE > 500 mrem
 - Neutron dose > 50 mrem
4. List of all management over-rides of administrative annual dose limits since August 29, 2020
5. List of all personnel contamination events identified since August 29, 2020.
6. Most recent alpha source term plant characterization
7. Area TLD results for general plant areas (not REMP TLDs), going back two years
8. The most recent DLR/SRD correlation analysis
9. Copies of current WBC libraries (e.g. routine, medical, investigative, etc.)
10. Most recent audit or self-assessment of the dosimetry program
11. List of CRs generated since August 29, 2020, for internal or external dosimetry issues/events.

71124.05 - Radiation Monitoring Instrumentation

1. Procedures for:
 - a) calibration and source checks of portable radiation detection instruments
 - b) calibration and source checks of small article monitor, personnel contamination monitor, portal monitor, whole body counting equipment, and continuous air monitors
 - c) QA program for count room instruments
2. The last 2 calibration records for each of the following in-plant instruments:
 - a) U2 Containment High Range Monitor, 2-RE-90-271

- b) U2 Containment High Range Monitor, 2-RE-90-274
 - c) Waste Disposal System Liquid Effluent, 0-RE-90-122
 - d) U2 Shield Building Vent Normal Range Noble Gas, 2-RE-90-400
 - e) U2 Accident Range Noble Gas, 2-RE-90-261
 - e) U2 Shield Building Vent Flow Monitor
3. Radioactive source paperwork for the sources used to calibrate the instruments in item 2 above. This paperwork should include NIST/NBS certificates, as applicable, and traceability to the primary (factory) calibration
 4. The last two surveillances (in-place filter tests and charcoal tests) performed on the Unit 2 Emergency Gas Treatment System (EGTS), Train A.
 5. The last 2 calibration records for each of the following RCA exit point 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
 6. Most recent calibration record of the Whole Body Counter used by Dosimetry
 7. Most recent calibration record for all gamma spectroscopy detectors in the count room
 8. Most recent calibration record for all liquid scintillation detectors in the count room
 9. Most recent test record of the instrument calibrator (Shepherd validation testing/dose rate curves)
 10. Interlaboratory comparison results for the onsite count room, going back two years.
 11. Most recent audit or self-assessment covering RP and count room instruments (portables, RCA exit point, WBC, count room).
 12. Most recent Radiation Monitoring System health report, if applicable.
 13. List of CRs generated since August 29, 2020 related to portable instruments, area monitors, effluent monitors, CAMs, RCA release point monitors, WBCs, and count room instruments.

71124.07 - Radiological Environmental Monitoring Program (REMP)

1. 2021 REMP Report
2. Collection schedule for REMP samples during the weeks of inspection and contact numbers for collection staff.
3. Procedures for collection and analysis of environmental samples, calibration and maintenance of REMP air and water samplers, and calibration of meteorological monitoring instruments
4. The last two calibration records for each REMP air and water sampler (as applicable)
5. The last two calibration records for each meteorological monitoring instrument on the primary tower (wind speed, wind direction, and air temperature)
6. Annual data recovery report(s) for meteorological monitoring instruments since July 20, 2019
7. Most recent inter-laboratory comparison results for the lab used to analyze REMP samples
8. List of systems, structures, and components (SSCs), identified as credible mechanisms for the potential release of licensed material to the groundwater. Including risk-ranking.
9. List of any non-radioactive systems that have become contaminated since July 20, 2019.
10. Copies of any reports to the NRC (via ODCM, 10CFR50.72, or any other reporting requirements) due to effluent/REMP/groundwater issues since July 20, 2019.
11. List of 10 CFR 50.75(g) entries made since July 20, 2019.
12. Recent results of the groundwater monitoring program (at least the last two quarters)
13. Most recent audit, self-assessment, and/or review of REMP activities
14. List of CRs generated as a result of REMP activities since July 20, 2019. Include all CRs related to voluntary reporting of onsite spills/leaks of radioactive material.

71151 – Performance Indicator (PI) Verification

1. Procedures for gathering and reporting NRC PI data, including any applicable “desktop guides”
2. List of electronic dosimeter alarms since October 9, 2021 (dose and dose rate)
3. List of CRs related to ODCM/SLC/effluent monitoring issues since July 17, 2021
4. 2021 Annual Effluent Report
5. 2022 year-to-date effluent dose summary