

**From:** [Adam Nielsen](#)  
**To:** [Boyce, Laura](#)  
**Cc:** [Jose Diaz](#); [Darrell Neal](#)  
**Subject:** Oconee RP inspection document request  
**Date:** Thursday, September 21, 2023 1:28:00 PM  
**Attachments:** [OCO\\_2023-04\\_RP\\_doc\\_request.pdf](#)

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Please see the attached document request for our upcoming baseline RP inspection scheduled for October 30 – November 3, and November 13 – 17, 2023. Note that some of the items may be outside RP's purview, so coordination with other groups might be required (e.g. rad monitor calibration records, ventilation filter testing records, etc).

We would like to have the documents available by October 23, 2023. However, if you run into difficulty and need more time for certain items, just let us know and we can work with you. It has been our experience that inspection procedure 71124.05 "Instruments", item number 3 (calibration source traceability paperwork) has been challenging for licensees to produce. I would encourage you to begin gathering those particular documents at your earliest convenience.

Please call or email me if you have any questions.

Thanks,  
Adam Nielsen  
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US NRC Region II  
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Oconee Nuclear Station  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2023004

During the weeks of October 30 - November 3, and November 13 - 17, 2023, the NRC will perform a baseline radiation safety inspection at Oconee Nuclear Station (NRC Inspection Procedures 71124.01, 71124.03, 71124.04, 71124.05, 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 23, 2023.

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

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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 30 - November 3, and November 13 - 17, 2023

Documents Due to Region II: October 23, 2023

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 71151	Performance Indicator Verification (Occupational Cornerstone Only)

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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. Timeline of major outage activities for U2EOC31 (e.g. Gantt chart or similar list)
2. List of primary contacts for each inspection area w/phone numbers
3. Corrective action program procedure(s)
4. Most recent 10 CFR 61 analysis for the Dry Active Waste (DAW) waste stream
5. Offsite Dose Calculation Manual/SLC Manual

### 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, ISFSI Controls, etc.)
2. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm followup, etc.)
3. List of outage RWPs
4. List of all non-fuel items stored in spent fuel pool
5. Most recent self-assessment or audit covering RP controls
6. Outage ALARA report from the previous (most recent) refueling outage
7. ALARA planning packages for top 3 highest dose jobs for the U2EOC31 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.) issued since May 7, 2022.

#### 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 Unit 3 Main Control Room Ventilation System (CRVS). As required by TS 5.5.12, items a, b, and c.
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 December 4, 2021.

#### 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 December 4, 2021:
  - CEDE > 10 mrem
  - SDE > 500 mrem
  - Neutron dose > 50 mrem
4. List of all management over-rides of administrative annual dose limits since December 4, 2021
5. List of all personnel contamination events identified since December 4, 2021
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. Most recent audit or self-assessment of the dosimetry program
10. List of CRs generated since December 4, 2021, 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) RIA-33, Liquid Waste
  - b) 1RIA-45, Unit 1 Vent Gas, Normal Range
  - c) 1RIA-46, Unit 1 Vent Gas, High Range
  - d) 1RIA-56, Unit 1 Vent High Range

- e) 1RIA-57, Unit 1 Reactor Building Area, High Range
  - f) 1RIA-58, Unit 1 Reactor Building Area, High Range
  - g) 3RIA-1, Unit 3 Main Control Room Area
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 HEPA filter tests, in-place charcoal tests, and lab charcoal tests) performed on the Unit 1 Reactor Building Purge Exhaust Filtration System
  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 test record of the portable instrument calibrator (gamma irradiator validation testing/dose rate curves)
  9. Interlaboratory comparison results for the onsite count room, since December 4, 2021.
  10. Most recent audit or self-assessment covering RP and count room instruments (portables, RCA exit point, WBC, count room).
  11. Most recent Radiation Monitoring System health report, if applicable.
  12. List of CRs generated since December 4, 2021 related to portable instruments, area monitors, effluent monitors, CAMs, RCA release point monitors, WBCs, and count room instruments.

#### 71151 – Performance Indicator (PI) Verification

1. Procedures for gathering and reporting NRC PI data
2. List of electronic dosimeter alarms since May 7, 2022 (dose and dose rate)
3. List of CRs related to ODCM/SLC Manual/effluent monitoring issues since May 7, 2022
4. 2023 year-to-date public dose summary due to liquid and gaseous effluents