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10 CFR 50.90

Serial: RA-23-0121 October 5, 2023

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

SUBJECT: License Amendment Request to Adopt TSTF-258-A, Revision 4, Regarding Changes to Technical Specification Section 5.7, "High Radiation Area"

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy) is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (RNP), Unit No. 2. The proposed amendment would revise TS Section 5.7, "High Radiation Area," consistent with NRC-approved TS Task Force (TSTF) traveler 258 (TSTF-258-A), Revision 4, "Changes to Section 5.0, Administrative Controls."

The Enclosure to this letter provides an evaluation of the proposed changes. Attachment 1 provides the existing TS pages marked to show the proposed changes.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the proposed changes involve no significant hazards consideration. The basis for this determination is included in the Enclosure.

Duke Energy requests approval of the proposed license amendment within one year of completion of the NRC's acceptance review. Once approved, Duke Energy will implement the amendment within 120 days.

This submittal contains no new regulatory commitments.

In accordance with 10 CFR 50.91, Duke Energy is notifying the state of South Carolina of this license amendment request by transmitting a copy of this letter to the designated state officials. Should you have any questions concerning this letter, or require additional information, please contact Ryan Treadway, Director – Nuclear Fleet Licensing, at 980-373-5873.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 5, 2023.

Sincerely,

ABRAND

Laura A. Basta Site Vice President

Enclosure: Evaluation of the Proposed Change

Attachments:

1. Marked-Up Technical Specifications Pages

- cc: (all with Enclosure/Attachment)
 - L. Dudes, Regional Administrator USNRC Region II
 - J. Zeiler, NRC Senior Resident Inspector
 - L. Haeg, NRR Project Manager

A. Wilson, Attorney General (SC)

- R. S. Mack, Assistant Bureau Chief, Bureau of Environmental Health Services (SC)
- L. Garner, Manager, Radioactive and Infectious Waste Management Section (SC)

Enclosure

EVALUATION OF THE PROPOSED CHANGE

- 1.0 SUMMARY DESCRIPTION
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1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy) is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (RNP), Unit No. 2. The proposed amendment would revise TS Section 5.7, "High Radiation Area," consistent with NRC-approved TS Task Force (TSTF) traveler 258 (TSTF-258-A), Revision 4, "Changes to Section 5.0, Administrative Controls." The NRC approved TSTF-258-A, Revision 4, in a letter dated June 29, 1999 (Reference 1).

2.0 DETAILED DESCRIPTION

2.1 Description of the Proposed Change

As shown in the TS markups provided in Attachment 1, TS Section 5.7 is replaced in its entirety with rewritten text. The proposed TS 5.7.1 describes the requirements for areas with dose rates less than or equal to 1.0 rem/hour at 30 centimeters (cm) from the radiation source, consistent with the current TS 5.7.1. The proposed TS 5.7.2 describes the requirements for areas with dose rates greater than 1.0 rem/hour at 30 cm from the radiation source, but less than 500 rads/hour at 1 meter from the radiation source, consistent with the current TS 5.7.2. There are no Bases for Section 5.7; therefore, there are no Bases changes required for this amendment request.

The significant changes proposed in Attachment 1, with respect to the current RNP TS, are summarized below:

- 1. The proposed TS 5.7.1 specifies its applicability is for areas not exceeding dose rates of 1.0 rem/hour at 30 cm from the radiation source. The current TS 5.7.1 specifies an equivalent radiation level of 1000 mrem/hour but is silent regarding distance from the radiation source.
- 2. The current TS 5.7.2 invokes the requirements of TS 5.7.1 by reference, whereas the proposed TS 5.7.1 and 5.7.2 each state their requirements explicitly.
- 3. The proposed TS 5.7.1.a specifies that barricades may be opened as necessary to permit entry or exit of personnel or equipment. Current TS are silent in this regard.
- 4. The proposed TS 5.7.1.b and 5.7.2.b specify that the Radiation Work Permit (RWP) includes specification of radiation dose rates and other radiation protection equipment and measures. The current TS are silent in this regard.
- 5. The current TS 5.7.1.b specifies that entry into the high radiation area may be made after dose rates in the area have been established and personnel are aware of them. In addition, current TS 5.7.1.c allows the option of being escorted by a radiation control technician performing periodic radiation surveillance to permit entry into the high radiation area. In the proposed TS, these two requirements are combined under TS 5.7.1.e (as well as under corresponding TS 5.7.2.e), with the exception that the proposed TS 5.7.1.e / 5.7.2.e does not specify performance of a periodic radiation surveillance. Furthermore, the proposed TS 5.7.1.e / 5.7.2.e specifies that the escorted personnel will receive a pre-job brief and that the dose rate determination, knowledge, and pre-job briefing requirements described in TS 5.7.1.e / 5.7.2.e do not require documentation prior to initial entry. The current TS are silent in this regard.
- The proposed TS 5.7.1.d items 3 and 4 as well as TS 5.7.2.d items 2 and 3 are additional options to permit entry into the high radiation area that are not specified in the current TS.
- 7. The proposed TS 5.7.2.a allows the option of a continuously guarded door or gate in place of a locked door. The current TS does not specify this as an allowable option.

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- 8. The proposed TS 5.7.2.a item 2 specifies that doors and gates shall remain locked except during periods of personnel or equipment entry or exit. The current TS are silent in this regard.
- 9. The proposed TS 5.7.2.d item 4 specifies a radiation monitoring device that continuously displays dose rates is an option if items 2 and 3 are impractical or inconsistent with the "As Low As is Reasonably Achievable" principle. The current TS allows this device as an option with no restrictions.
- 10. The proposed TS 5.7.2.c provides an exemption to RWP requirements for individuals qualified in radiation protection procedures. The current TS 5.7.2 specifies that this exemption is not allowed for areas with dose rates greater than 1000 mrem/hour.
- 11. The proposed TS 5.7.2.f provides requirements for a larger area where no enclosure exists or can reasonably be constructed. Current TS are silent in this regard.

2.2 Description of Variations

Differences between the proposed RNP TS and the markups provided in TSTF-258-A are listed below:

- 1. The proposed TS 5.7.1.d item 1 utilizes a comma (,) after "area" instead of the semicolon (;) utilized in TSTF-258-A. This punctuation change is an editorial difference to be consistent with other items in the TS 5.7.1.d list and does not affect the applicability of TSTF-258-A to the proposed change.
- The proposed TS 5.7.2.a item 1 utilizes the title "shift manager" instead of the title "shift supervisor" utilized in TSTF-258-A. This is a change to reflect the title of the position who would be designated for the key control function at Duke Energy and does not affect the applicability of TSTF-258-A to the proposed change. See Section 3.0 for further discussion.
- 3. The TSTF-258-A TS 5.7.2.e contains an editorial error of an additional period (.) after the first sentence. This additional period is not included in the proposed TS. This is an editorial change and does not affect the applicability of TSTF-258-A to the proposed change.

3.0 TECHNICAL EVALUATION

The NRC approved TSTF-258-A, Revision 4, in a letter dated June 29, 1999 (Reference 1). The justification provided in TSTF-258-A is repeated below with a disposition of applicability to the proposed RNP TS.

TSTF-258-A Section 5.7 Justification (first paragraph)

Section 5.7 is revised in accordance with 10 CFR 20.1601(c) and updates the acceptable alternate controls to those given in 10 CFR 20.1601. These changes are consistent (with the exception provided below) with the draft Generic Letter (93-XX) on proposed changes to STS NUREGs based on the new 10 CFR 20 and the letter from C. Grimes, NRC, to J. Davis, NEI dated April 9, 1997. (The NRC proposed version of Section 5.7 provided in the April 9, 1997 letter is included in this traveler with the recommended changes marked.)

Duke Energy disposition

This justification applies to the proposed TS without exception. Furthermore, although the current RNP TS are different than the original TS that were modified by TSTF-258-A, the entire Section 5.7 is replaced with requirements that are consistent with the approved requirements in TSTF-258-A. The proposed TS Section 5.7 requirements are also consistent with the TS

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Section 5.7 requirements in NUREG-1431, "Standard Technical Specifications Westinghouse Plants." None of the differences between the current TS and the original TS modified by TSTF-258-A affect the applicability of TSTF-258-A to the proposed change.

TSTF-258-A Section 5.7 Justification (first bullet regarding exceptions)

 Changes to 5.7.1d.4.(ii): In the event that communications are lost between an individual worker, and the Radiation Protection staff providing the remote surveillance, the worker should be able to continue to work in the area provided that the worker can communicate with other workers in the same area who are working on the same job and under the same RWP, and provided that the communications remain satisfactory between these workers and the RP staff providing the remote surveillance..

Duke Energy disposition

This justification applies to the proposed TS without exception.

TSTF-258-A Section 5.7 Justification (second bullet regarding exceptions)

Changes to 5.7.1.e and 5.7.2.e: Revised to allow any individual or group of individuals to enter a high-high radiation area (dose rates > 1 Rem/hr at 30 cm) when accompanied by an individual qualified in radiation protection procedures with a radiation dose rate monitoring device. The qualified individual is responsible for providing positive control and shall perform periodic radiation surveillances at the frequency specified in the RWP. Furthermore, these continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry. Many plant's CTS requirements allow this option, which compliments the plant's practices of requiring qualified individual escort at all times during the work in a high-high radiation area. This option would provide adequate protection while (keeping with ALARA practices) minimizing exposure to the qualified individual.

Duke Energy disposition

This justification applies to the proposed TS without exception.

TSTF-258-A Section 5.7 Justification (third bullet regarding exceptions)

• Changes to 5.7.2a: Section 5.7.2a is revised to state "Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate ..." This change is consistent with RG 8.38 Section 2.5 which indicates that the use of a locked door or one control point where positive control over personnel entry is exercised. Posting an individual to monitor a door provides positive controls over a high radiation area.

Duke Energy disposition

This justification applies to the proposed TS without exception.

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TSTF-258-A Section 5.7 Justification (fourth bullet regarding exceptions)

• Changes to 5.7.2.a.1: The Shift Foreman is only one of the many possible operations shift management positions who may be designated for the key control function. This change is similar to the wording of the NRC 7-28-95 letter to the Owner's Group Chairmen which identifies key control responsibility with the "shift supervisor, radiation protection manager, or his or her designee."

Duke Energy disposition

This justification applies to the proposed TS with the exception that the title "shift manager" is utilized in the proposed TS instead of "shift supervisor" or "Shift Foreman." This is a change to reflect the title of the operations shift management position who would be designated for the key control function at Duke Energy and does not affect the applicability of TSTF-258-A to the proposed change.

TSTF-258-A Section 5.7 Justification (fifth bullet regarding exceptions)

• Changes to 5.7.2f. (deleting "that is controlled as a high radiation area"): The 5.7.2.f provision has applied (in previous STS as well as ISTS NUREGs) without the added constraint of having the larger area controlled as a high radiation area. It is not always practical to control such areas as a High Radiation Area (outside of these High-High Radiation Areas). The proposed change to the NRC proposed Model Specification would restore the requirement as it exists in ISTS NUREG Rev1.

Duke Energy disposition

This justification applies to the proposed TS without exception.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

Section 20.1101, "Radiation protection programs," of 10 CFR Part 20, "Standards for Protection Against Radiation," requires licensees to develop, document, and implement a radiation protection program commensurate with the scope of licensed activities and sufficient to ensure compliance with the provisions of 10 CFR Part 20.

The regulations in 10 CFR 20.1601 establish requirements for controlling access to high radiation areas (HRAs). Paragraph (c) of 10 CFR 20.1601 allows for licensees to apply to the Commission for approval of alternative methods for controlling access to HRAs.

Regulatory Guide (RG) 8.38, Revision 1, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," describes methods the NRC staff finds acceptable for implementing the requirements applicable to the control of access to high and very high radiation areas (VHRAs) in nuclear power plants. Section 2.2 of RG 8.38 describes acceptable methods of exerting positive access control over entries into HRAs. Section 2.4 of RG 8.38 describes an acceptable alternative method to 10 CFR 20.1601(a) for access control to HRAs.

The regulations in 10 CFR 50.36, "Technical specifications," establish the regulatory requirements related to the content of TS. In accordance with 10 CFR 50.36(c)(5), the TS must include administrative controls, which "are the provisions relating to organization and

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management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner."

NUREG-1431, Revision 5, "Standard Technical Specifications Westinghouse Plants," is the NRC's approved standard TS for Westinghouse-designed nuclear power plants such as RNP. The proposed TS are consistent with NUREG-1431 as described in Section 3.0 above.

This change does not affect plant compliance with the above regulations / guidance.

4.2 Precedent

The proposed change is consistent with the current version of the Standard Technical Specifications, NUREG-1431, which includes TSTF-258-A. An example of plant-specific NRC approval of the changes in TSTF-258-A, Revision 4, related to high radiation area controls are the amendments for Indian Point Nuclear Generating Units 2 and 3 approved under safety evaluation dated December 13, 2006 (Reference 2). Note that the Indian Point amendments include TSTF-258-A changes beyond the high radiation area controls and are thus not in scope of this proposed change.

4.3 No Significant Hazards Consideration Determination

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy) is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (RNP), Unit No. 2. The proposed amendment would revise TS Section 5.7, "High Radiation Area," consistent with NRC-approved TS Task Force (TSTF) traveler 258 (TSTF-258-A), Revision 4, "Changes to Section 5.0, Administrative Controls." The NRC approved TSTF-258-A, Revision 4, in a letter dated June 29, 1999 (Reference 1).

Duke Energy has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change is related to the control of access to high radiation areas for controlling dose to plant personnel. The proposed change does not impact any accident initiators and does not alter the design, configuration, operation, or function of any plant structure, system, or component. The outcomes of previously evaluated accidents are unaffected. There is no impact on the source term or pathways assumed in accidents previously assumed. No analysis assumptions are violated and there are no adverse effects on the factors that contribute to offsite or onsite dose as the result of an accident.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change is related to the control of access to high radiation areas for controlling dose to plant personnel. No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. The proposed change does not challenge the performance or integrity of any safety related system. The proposed change neither installs nor removes any plant equipment, nor alters the design, physical configuration, or mode of operation of any plant structure, system, or component. No physical changes are being made to the plant, so no new accident causal mechanisms are being introduced.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident. These barriers include the fuel cladding, the reactor coolant system boundary, and the containment system. The proposed change is related to the control of access to high radiation areas for controlling dose to plant personnel. The proposed change will have no effect on the availability, operability, or performance of the safety related systems and components. The proposed change does not alter the design, configuration, operation, or function of any plant structure, system, or component. The ability of any operable structure, system, or component to perform its designated safety function is unaffected by the proposed change. There is no impact on the fission product barriers or parameters associated with licensed safety limits.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Duke Energy concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

6.0 REFERENCES

- 1. NRC letter regarding various TSTF traveler approvals, dated June 29, 1999 (ADAMS Accession Number ML16237A030)
- NRC letter, Indian Point Nuclear Generating Unit Nos. 2 and 3 Issuance of Amendments Re: Technical Specification Changes – Adoption of TSTF-258, TSTF-308, and Related Administrative Control Changes based on NUREG-1431 (TAC Nos. MC9475 AND MC9476), dated December 13, 2006 (ADAMS Accession Number ML063050208)

Attachment 1

Marked-Up Technical Specifications Pages

(6 Pages Follow)

5.0 ADMINISTRATI E CONTROLS

5.7 High Radiation Area

5.7.1	In lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a) of 10 CFR 20, each High Radiation Area in hich the intensity of radiation is 1000 mRem/hour or less shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).
· ·	Radiation control personnel or personnel escorted by radiation control personnel shall be exempt from the RWP issuance requirements during the performance of their assigned duties ithin the RCA, provided they comply ith approved radiation protection procedures for entry into High Radiation Areas.
	Any individual or group of individuals permitted to enter such areas shall be provided ith or accompanied by one or more of the follo ing:
	a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
	b. A radiation monitoring device provided for each individual that continuously integrates the radiation dose rate in the area and alarms hen a preset integrated dose is received. Entry into such areas ith this monitoring device may be made after the dose rate levels in the area have been established and personnel are a are of them.
	c. An individual qualified as a radiation control technician ith a radiation dose rate monitoring device, no is responsible for providing positive control over the activities ithin the area and shall perform periodic radiation surveillance at the frequency specified by the radiation control supervisor in the RWP.
	Replace with new Section 5.7.1 and text above Section 5.7.1 from Insert 1

(continued)

HBRSEP Unit No. 2

Amendment No. 212

5.7 High Radiation Area (continued)

5.7.2 The requirements of 5.7.1 shall apply to each High Radiation Area in hich the intensity of radiation is greater than 1000 mRem/hour at 30 centimeters (12 inches) from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or from any surface penetrated by the radiation. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the SS on duty and/or the radiation control supervisor. Entrance thereto shall also be controlled by requiring issuance of an RWP. The exemption from RWP issuance requirements discussed in 5.7.1 is not applicable for any High Radiation Area in hich the intensity of radiation is greater than 1000 mRem/hour.

Replace with new Section 5.7.2 from Insert 1

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

- 5.7.1 <u>High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30</u> <u>Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation</u>
 - a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
 - b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
 - c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
 - d. Each individual or group entering such an area shall possess:
 - 1. A radiation monitoring device that continuously displays radiation dose rates in the area, or
 - 2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 - 3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

5.7.1 <u>High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30</u> Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

- 4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
- 5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation
 - a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
 - 1. All such door and gate keys shall be maintained under the administrative control of the shift manager, radiation protection manager, or his or her designee.
 - 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.

- 5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)
 - b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
 - c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
 - d. Each individual or group entering such an area shall possess:
 - 1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 - 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
 - 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.

- 5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)
 - 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
 - e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
 - f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.