

**From:** [Bob Kellner](#)  
**To:** [Sherrill, Thomas M](#)  
**Subject:** NRC Public Radiation Safety Inspection at Brunswick (May 20 - 24, 2024)  
**Date:** Tuesday, March 5, 2024 9:27:00 AM  
**Attachments:** [BRU 2024002 RP Document Request List.pdf](#)

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Tom,

Thank you for confirming that you will be the licensing contact for the NRC Public Radiation Safety Inspection at Brunswick scheduled of the week of May 20 - 24, 2024.

Attached is the Information Request for the inspection. The request includes a list of the documents we routinely request for Inspection Procedures (IPs) 71124.06 - Effluents, 71124.07 - REMP, and 71151 – PIV (public cornerstone only). If you plan to upload the requested documents to CERTREC, using software to 'zip' the numerous files into a single file prior to upload has proven to be very efficient.

As mentioned previously, the plan is to be onsite the week of May 20-24, 2024. As of right now, Adam Nielsen and I will be the inspectors of record. However, we have several people from R-II and headquarters working on qualifications who may be accompanying us for the inspection. I will let you know who those individuals are in early May.

Please let me know if you have any questions.

Regards,

Bob

***Robert Kellner***

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Brunswick Steam Electric Plant  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2024002

During the week of May 20 - 24, 2024, the NRC will perform a baseline Radiation Safety Inspection at the Brunswick Steam Electric Plant (NRC Inspection Procedures (IP) 7124.06, 71124.07, and 71151 (Public Cornerstone).

Experience has shown that this inspection can be resource-intensive for both the NRC inspectors and your staff. 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 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 May 10, 2024.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner at [Robert.Kellner@nrc.gov](mailto:Robert.Kellner@nrc.gov), at 404-997-4508, 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

### Public Radiation Safety Cornerstone

Inspection Dates: May 20 - 24, 2024

Documents Due to Region II by: May 10, 2024

Inspection Procedures:	IP 71124.06	Gaseous and Liquid Effluent
	IP 71124.07	Radiological Effluent Monitoring Program (REMP)
	IP 71151	Performance Indicator Verification (Public Cornerstone)

#### Lead Inspector & Mailing Address:

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**Note:** Current versions of these documents is expected unless specified otherwise. Secure file server access (Certrec, SharePoint, etc.), or electronic media (CD/DVD), is preferred. To the extent possible, please organize the information as it is arranged below. Experience has shown that poorly organized files can lead to a less efficient inspection and places additional burden on licensee staff. 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 is requested from **June 1, 2020**, to present for IPs 71124.06 and IP 71124.07. Documentation is requested from **April 1, 2023**, to present for IP 71151. An index of the files 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

1. List of primary contacts for each inspection area including names and telephone numbers
2. Radiation Protection, and Chemistry organizational charts w/ contact numbers
3. Corrective action program procedure(s)
4. List of radiation protection and chemistry procedures, including title and number
5. Copy of the current Offsite Dose Calculation Manual and Selected Licensee Commitments Manual
6. Copy of the 2023 Brunswick Annual Radioactive Effluent Release Report and Annual Radiological Environmental Operating Report

#### 71124.06 - Radioactive Gaseous and Liquid Effluent Treatment (Last inspected June 2020)

1. Procedures for sampling and controlling radioactive gaseous and liquid effluents to include: collection, analysis, release, alarm setpoints, offsite dose calculation and evaluation.

2. Provide a list of changes made to the Offsite Dose Calculation Manual (ODCM), meteorological dispersion or deposition factors, and radioactive effluent processing/discharge systems since June 1, 2020.
3. List of “out of service” (OOS) effluent monitors and duration since June 1, 2020.
4. List of unmonitored spills, leaks, or unexpected liquid/gaseous discharges since June 1, 2020.
5. Provide a schedule of expected or planned routine effluent sampling activities (e.g. weekly main vent stack, groundwater sampling, etc.) during the planned onsite inspection week.
6. Completion documentation of the two most recent surveillances (flow rate, in-place filter testing, and charcoal testing) performed on the:
  - Unit 2 Control Building Ventilation system
  - Unit 1 Augmented Off-Gas Charcoal Adsorber System
  - Unit 2 Standby Gas Treatment System.
7. Material condition surveillance records for effluent treatment system components not readily accessible for any reason (e.g. in-service & spent resin tanks, waste gas hold-up tanks, etc.).
8. The two most recent inter-laboratory comparison program results (for the onsite counting lab).
9. Most recent audit, self-assessment, and/or review of the radioactive effluent monitoring program
10. List of CAP documents generated since June 1, 2020, as a result of gaseous and liquid effluent processing and/or ODCM related activities. *This should be a list of documents containing a CAP document number and a brief description, not complete documents.*

71124.07 - Radiological Environment Monitoring Program (REMP)  
(Last inspected June 2020)

1. Procedures for radiological environmental monitoring, including but not limited to:
  - Collection, preparation and analysis of environmental samples
  - Calibration and maintenance of REMP air and/or water samplers
  - Calibration of meteorological monitoring instruments
  - Periodic meteorological instrumentation surveillance requirements
  - Land use census
  - Calibration and quality control of for sample counting instruments
2. Procedures associated with the NEI/industry groundwater protection initiative.
3. Copy of the 2020, 2021, 2022, and 2023 Land Use Census Evaluation or Report.
4. Collection schedule for REMP samples to be obtained during the planned inspection week, and contact information for collection staff.
5. Last two calibration records for ALL REMP air and water sampling equipment.
6. Last two calibration records for meteorological monitoring instrumentation on the primary tower (wind speed & direction, and air temperature).
7. Data recovery report for meteorological monitoring instruments since June 1, 2020.
8. List of systems, structures and components identified as credible mechanisms for the potential release of licensed material to the groundwater (e.g. SSC risk ranking matrix)
9. List of any non-radioactive system that has become contaminated since June 1, 2020.

10. Summary of any leaks and/or spills that have occurred since June 1, 2020 (e.g. copy of 50.75(g) file).
11. Copies of any reports to the NRC regarding abnormal onsite spills/leaks or radioactive material since June 1, 2020.
12. Groundwater monitoring results since June 1, 2020.
13. Environmental TLD results since June 1, 2020.
14. List of onsite surface water bodies (e.g. ponds, retention basins, lakes) that contain or can potentially contain radioactivity
15. Most recent audit/self-assessment of REMP activities, including audits of vendor activities.
16. List of CAP documents related to REMP activities or groundwater, including leaks or spills since June 1, 2020. *This should be a list of documents containing a CAP document number and a brief description, not complete documents.*

71151 – Performance Indicator Verification (Occupational and Public Cornerstones)  
(Last inspected April 2023)

1. Site and corporate procedure(s) for gathering and reporting PI data.
2. Copy of the last liquid and gaseous effluent release permit for CY 2023 which specifies the quarterly and annual (year to date) curies released by isotope and the associated public dose assessment(s), or the CY 2023 end-of-year liquid and gaseous effluent release report which specifies the quarterly and annual curies released by isotope and the associated public dose assessment.
3. Copy of the most recent gaseous and liquid effluent release permits indicating the current dose to the public (year-to-date doses).
4. List of CAP documents related to effluent dose/ODCM issues since April 1, 2023, using keywords such as: RETS, ODCM, effluent, abnormal release, unmonitored release, offsite dose, effluent release, etc. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

Onsite Assistance During Inspection

- Radiation Protection assistance coordinating walk-downs of the meteorological tower, and gaseous and liquid waste processing systems.
- Radiation Protection / Chemistry coordination for observation of REMP and effluent sampling activities (REMP Run and on-site effluent samples).

Inspector Contact Information:

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