

From: [Bob Kellner](#)
To: rgsurber@southernco.com
Cc: [Jack Bell](#); [David Restrepo](#)
Subject: NRC Public Radiation Safety Inspection at Farley - August 19-23, 2024
Date: Thursday, June 27, 2024 8:53:00 AM
Attachments: [FAR 2024-003 Radiation Safety Inspection Document Request.pdf](#)

Gene,

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. Note that some of the items may be outside RP's purview, so coordination with other groups may be required (e.g., ventilation testing records, chemistry sampling, etc.).

The plan is to be onsite the week of August 19-23, 2024. As of right now, Jack Bell and I will be the inspectors of record. David Restrepo who is working on his qualifications will be accompanying us for the inspection. David and I were onsite in April so our access should be up to date. I don't know when Jack was last onsite.

Please let me know if you have any questions.

Regards,

Bob

Robert Kellner

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Farley Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2024003

During the week of August 19 - August 23, 2024, the NRC will perform a baseline Radiation Safety Inspection at the Farley Nuclear Plant (NRC Inspection Procedures 71124.06, 71124.07, and 71151 (public cornerstone only)).

Experience has shown that this inspection is 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 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 August 9, 2024.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner at 404-997-4508, or the Engineering Branch 3 Branch 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 letter contains voluntary information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). The burden to the public for these information collections is estimated to average 15 hours per response. Send comments regarding this information collection to the FOIA, Library and Information Collection Branch, Office of the Chief Information Officer, Mail Stop: T6-A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) OMB, Washington, DC 20503.

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: August 19 - 23, 2024

Documents Due to Region II by: August 9, 2024

Inspection Procedures:	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment
	IP 71124.07	Radiological Environmental Monitoring Program
	IP 71151	Performance Indicator Verification

Lead Inspector and Mailing Address:

Robert Kellner Senior Health Physicist US NRC Region II (404) 997-4508 Robert.Kellner@nrc.gov	U.S. Nuclear Regulatory Commission Region II ATTN: Robert Kellner 245 Peachtree Center Ave., N.E Suite 1200 Atlanta, GA 30303
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Note: Current version 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. To the extent possible, please organize the information as it is arranged below. Pay 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.

Documentation is requested from **June 1, 2021**, to present for IPs IP 71124.06, and 71124.07, and from **October 1, 2023**, to present for IP71151 (public radiation safety only). We would prefer as much of the information as possible in electronic form. An index of the files is also helpful. For those items requesting a list of documents/areas, the inspector will may select documents/areas from the list for on-site review.

Miscellaneous

1. Plant Management, Radiation Protection, and Chemistry organizational charts
2. List of primary contacts for each inspection area w/phone numbers
3. List of radiation protection and chemistry procedures, including title and number
4. Most recent 10 CFR 61 analysis for the DAW waste stream

71124.06 - Radioactive Gaseous and Liquid Effluent Treatment (Last inspected June 2021)

1. Procedures for sampling and controlling radioactive gaseous and liquid effluents including 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, 2021.
3. List of “out of service” (OOS) effluent monitors and duration since June 1, 2021.
4. List of unmonitored spills, leaks, or unexpected liquid/gaseous discharges since June 1, 2021.
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. List of permitted gaseous and liquid effluent release points, including release points from on-site surface water bodies (as applicable.)
7. Completion documentation of the two most recent surveillances (flow rate, in-place filter testing, and charcoal testing) performed on the:
 - Unit 1 Penetration Room Filtration System
 - Unit 2 Spent-Fuel Pool Ventilation System
8. 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.).
9. The two most recent inter-laboratory comparison program results (for the onsite counting lab).
10. Most recent audit, self-assessment, and/or review of the radioactive effluent monitoring program
11. List of CAP documents generated since June 1, 2021, 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 Environmental Monitoring Program
(Last inspected June 2021)

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 instrumentation.
2. Procedures associated with the NEI/industry groundwater protection initiative.
3. Copy of the 2021, 2022, 2023 and 2024 (if completed) Land Use Census Evaluation or Report.
4. Collection schedule for REMP samples to be obtained during the planned inspection week and the contact information for collection staff.
5. Two most recent calibration records for ALL REMP air and water sampling equipment.
6. Two most recent 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, 2021.

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, 2021.
10. Summary of any leaks and/or spills that have occurred since June 1, 2021 (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, 2021.
12. Groundwater monitoring results since June 1, 2021.
13. Environmental TLD results since June 1, 2021.
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, 2021. *This should be a list of documents containing a CAP document number and a brief description, not complete documents.*

71151 – Performance Indicator Verification (Public Cornerstone)
(Last inspected October 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 and the associated public dose, **or** the CY 2023 end-of-year liquid and gaseous effluent release report which specifies the quarterly and annual curies released and the associated public dose.
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 October 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.*

Assistance Requested During On-Site 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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